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BEFORE THE WASHINGTON UTILITIES
AND TRANSPORTATION COMMISSION

In the Matter of
Petition for Exemption

Case No.: TG-091774

by Harold LeMay Enterprises, Inc.
G-98, dba Rural Garbage Service

PETITION TO INTERVENE
OF WASHINGTON REFUSE
AND RECYCLING ASSOCIATION

COMES NOW the Washington Refuse and Recycling Association (WRRRA), and respectfully petitions to intervene in the above matter pursuant to WAC 480-07-355, and in doing so alleges as follows:

- 1) Proposed intervenor's address is: 4160 6th Ave. SE, Suite 205, Lacey, Washington 98503.
- 2) WRRRA is a trade association representing the vast majority of solid waste haulers in Washington state. As such, it has taken part as a party or intervenor in virtually every WUTC hearing regarding solid waste since the inception of regulation of solid waste. Matters involving regulation of the solid waste industry are of interest to the members of WRRRA, who would not be parties in this action. The issue herein, i.e., Petitioner's Petition for Exemption from Portions of WAC 480-07-520(4) is of interest to the industry at large and to specific members of WRRRA which may seek the same or similar exemptions as are being sought here. All rates filings are, of course, of importance to the industry and the Commission.

1 3) A trade association such as WRRRA is included in the definition of
2 “person” in WAC 480-07-340(1)(a). WAC 480-07-355(1)(a) provides that “any
3 person” may file a Petition to Intervene.

4 4) WRRRA will not broaden the issues in this matter.

5 5) It is anticipated that WRRRA’s position in this matter will be in
6 support of the Petition.

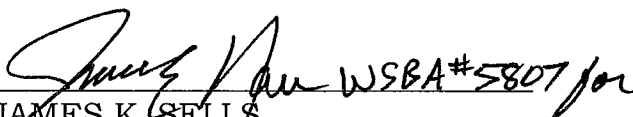
7 6) At this point WRRRA does not intend to call witnesses, but reserves
8 that right if this Petition to Intervene is granted.

9 7) Proposed intervenor’s attorney is:

10 James K. Sells
11 Ryan Sells Uptegraft, Inc. P.S.
12 9657 Levin Rd. NW, Suite 240
13 Silverdale, WA 98383
14 Phone: 360.307.8860
15 Fax: 360.307.8865
16 e-mail: jimsells@rsulaw.com

17 **WHEREFORE**, WRRRA prays that it be allowed to participate as an
18 intervenor in this matter.

19 DATED this 2nd day of June 2010.

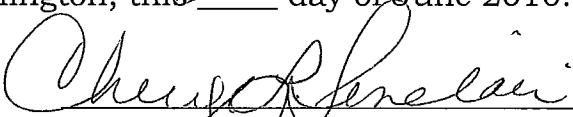
20 
21 JAMES K. SELLS
22 WSBA No. 6040
23 Ryan Sells Uptegraft, Inc. P.S.
24 9657 Levin Rd. NW, Suite 240
25 Silverdale, WA 98383
26 Attorneys for Washington Refuse
 and Recycling Association

1
2 **CERTIFICATE OF SERVICE**

3 I hereby certify that I have this day served this document upon all
4 parties of record in this proceeding, by the method as indicated below,
5 pursuant to WAC 480-07-150.

6 7 8 9 <i>Commission:</i> Washington Utilities and Transportation Commission 1300 S. Evergreen Park Dr. SW PO Box 47250 Olympia, WA 98504-7250 360.664.1160	<input type="checkbox"/> Via Legal Messenger <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via Email
10 11 12 13 14 <i>Representative</i> Robert Cedarbaum Asst. Attorney General 1400 S. Evergreen Park Dr. SW PO Box 40128 Olympia, WA 98504-0128 360.664.1186 bcedarba@utc.wa.gov	<input type="checkbox"/> Via Legal Messenger <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via Email
15 16 17 18 David W. Wiley Williams Kastner & Gibbs PO Box 21926 601 Union Street, Suite 4100 Seattle, WA 98111-3926 DWiley@williamskastner.com	<input type="checkbox"/> Via Legal Messenger <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via Email

19
20 DATED at Silverdale, Washington, this 2nd day of June 2010.

21 
22 Cheryl L. Sinclair