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RYAN SELLS UPTEGRAFT, INC. P.S.

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CHERYL K. RIFE
MARY SPAUN

January 4, 2008

GORDON L. WALGREN, *Of Counsel*

Ms. Carole Washburn
Executive Secretary
Washington Utilities and
Transportation Commission
P. O. Box 47250
Olympia, WA 98504-7250

**Re: Docket No. TG-072226
Glacier Recycle; Hungry Buzzard Recovery; T&T Recovery**

Dear Ms. Washburn:

Enclosed are an original and 12 copies of **Petition to Intervene of WRRRA.**

Very truly yours,

RYAN SELLS UPTEGRAFT, INC. P.S.



Cheryl L. Sinclair
Secretary to
JAMES K. SELLS

enc.

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MANAGEMENT
2008 JAN -7 AM 8:56
STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

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WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of Determining the Proper Carrier Classification of

GLACIER RECYCLE, LLC; HUNGRY BUZZARD RECOVERY, LLC; AND T&T RECOVERY, INC.

Case No.: TG-072226

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 over 30 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., the alleged unlawful transportation and disposal of solid waste, is of vital importance to WRRRA's members.
- 3) A trade association such as WRRRA is included in the definition of "person" in WAC 480-07-340(1)(a). WAC 480-07-355(1)(a) provides that "any person" may file a Petition to Intervene.


1 4) WRRRA does not intend to broaden the issues in this matter.
2 5) WRRRA's position with respect to the matter in controversy will be
3 that expressed by the Commission in its Order Instituting Special Proceeding
4 herein.

5 6) Proposed intervenor's attorney is:

6 James K. Sells
7 Ryan Sells Uptegraft, Inc. P.S.
8 9657 Levin Rd. NW, Suite 240
9 Silverdale, WA 98383
10 Phone: 360.307.8860
11 Fax: 360.307.8865
12 e-mail: jimsells@rsulaw.com

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

15 DATED this 4th day of January 2008.

16 
17 _____
18 JAMES K. SELLS
19 WSBA No. 6040
20 Ryan Sells Uptegraft, Inc. P.S.
21 9657 Levin Rd. NW, Suite 240
22 Silverdale, WA 98383
23 Attorneys for Washington Refuse
24 and Recycling Association

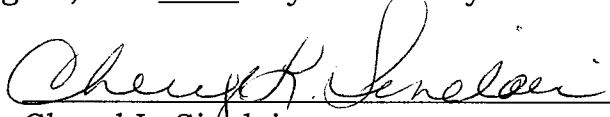
1 **CERTIFICATE OF SERVICE**

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

5 6 7 8 9 10 11 <i>Carriers:</i> Glacier Recycle, LLC 32300 – 148 th Ave. SE Auburn, WA 98092 Hungry Buzzard Recovery, LLC PO Box 13528 Mill Creek, WA 98082 T&T Recovery, Inc. 4731 Lost Creek Road Bellingham, WA 98229	<input type="checkbox"/> Via Legal Messenger <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via U.S. Mail <input type="checkbox"/> Via Email
12 13 14 15 16 <i>Representative:</i> Donald L. Anderson Eisenhower & Carlson, PLLC 1200 Wells Fargo Plaza 1201 Pacific Ave. Tacoma, WA 98402 253.572.4500	<input type="checkbox"/> Via Legal Messenger <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via U.S. Mail <input type="checkbox"/> Via Email
17 18 19 20 <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 type="checkbox"/> Via Email
21 22 23 24 25 <i>Representative</i> Jonathan Thompson Asst. Attorney General 1400 S. Evergreen Park Dr. SW PO Box 40128 Olympia, WA 98504-0128 360.664.1186	<input type="checkbox"/> Via Legal Messenger <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via U.S. Mail <input type="checkbox"/> Via Email

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DATED at Silverdale, Washington, this 4th day of January 2008.


Cheryl L. Sinclair