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3 **BEFORE THE WASHINGTON**  
4 **UTILITIES AND TRANSPORTATION COMMISSION**

5 WASHINGTON UTILITIES AND  
6 TRANSPORTATION COMMISSION,

7 Complainant,

8 v.

9 WASTE MANAGEMENT OF WASHINGTON,  
10 INC., d/b/a WASTE MANAGEMENT OF  
11 SPOKANE,

Respondent.

DOCKET TR-143889

PETITION TO INTERVENE BY  
SPOKANE COUNTY

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13 **1. Petition.** Pursuant to WAC 480-07-355, Spokane County ("County") petitions the  
14 Washington Utilities and Transportation Commission for leave to intervene in the above-  
15 captioned proceeding, as an intervenor with full party status as described in WAC 480-  
16 07-340.

17 **2. Petitioner's Information.**

18 Petitioner: Spokane County

19 Address: Spokane County Prosecuting Attorney's Office,  
20 1115 W. Broadway Avenue, Spokane, Washington 99260

21 Attention: James P. Emacio, Chief Civil Deputy Prosecuting Attorney

22 Representative: Foster Pepper PLLC

23 Address: 1111 Third Avenue, Suite 3400, Seattle, Washington 98101

24 Attention: P. Stephen DiJulio

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PETITION TO INTERVENE  
BY SPOKANE COUNTY - 1

**FOSTER PEPPER PLLC**  
1111 THIRD AVENUE, SUITE 3400  
SEATTLE, WASHINGTON 98101-3299  
PHONE (206) 447-4400 FAX (206) 447-9700

1 **3. Petitioner's Interest in the Proceeding.**

2 Spokane County is a legal subdivision of this state. Wa. Const., Art. XI, Sec. 1. By law,  
3 the County is responsible for solid waste management within the County (and within cities in the  
4 County that do not independently maintain solid waste management plans). Chapters 36.58 and  
5 70.95 RCW. The County has adopted and maintains a state-mandated Solid Waste Management  
6 Plan, including designation of disposal sites for waste collected in the County. The County also  
7 owns and operates solid waste facilities within the County, and regulates other solid waste  
8 handling facilities when sitting as the Board of Health. The County's intervention will ensure  
9 that the Commission receives all relevant evidence that directly relates to any tariff revisions.

10 Any increase in Respondent Waste Management's tariff directly and substantially affects  
11 the County (as a rate payer to WMI for certain County facilities) and County residents and the  
12 system of solid waste disposal in the County.

13 **4. Relief Requested.** The County respectfully requests that the Commission allow the  
14 County to intervene in this matter.

15 **5. Intervention by the County Will Serve the Public Interest.**

16 The County's intervention does not broaden the issue in the proceeding. At the Hearing,  
17 the issues before the Commission will be whether tariff rates are nondiscriminatory, and fair,  
18 just, reasonable, and sufficient. All County-related material will relate directly to this standard.  
19

20 **6. The Prompt and Orderly Conduct of the Petition Will Not be Impaired by the**  
21 **County's Intervention.**

22 The County will not seek to revise the issues in this case. The County will cooperate  
23 with the other parties in producing a record that is appropriate and conducive to the resolution of  
24 this action, and the County's legal counsel will brief any matter for the Commission without  
25 delay.  
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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon the persons and entities listed on the Service List below via electronic mail and by depositing a copy of said document in the United States mail, addressed as shown on said Service List, with first class postage prepaid.

|   |   |
|---|---|
| <b>For Waste Management:</b><br>Michael A. Weinstein<br>Senior Pricing Manager<br>Pacific Northwest Market Area<br>Waste Management<br>720 Fourth Avenue, Suite 400<br>Kirkland, WA 98033<br><a href="mailto:mweinstein@wm.com">mweinstein@wm.com</a> | <b>Attorneys for WUTC:</b><br>Julian Beattie<br>Office of the Attorney General<br>Utilities and Transportation Division<br>1400 S. Evergreen Park Dr. S.W.<br>P.O. Box 40128<br>Olympia WA 98504-0128<br><a href="mailto:jbeattie@utc.wa.gov">jbeattie@utc.wa.gov</a> |
| <b>Attorneys for Waste Management:</b><br>Polly L. McNeill<br>Summit Law Group PLLC<br>315 Fifth Avenue South, Suite 1000<br>Seattle, WA 98104-2682<br><a href="mailto:pollym@summitlaw.com">pollym@summitlaw.com</a>                                 |   |

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED January 16, 2015 at Seattle, Washington.

  
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Susan G. Bannier