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2 BEFORE THE WASHINGTON STATE
3 UTILITIES AND TRANSPORTATION COMMISSION
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5 In the matter of the Complaint:) DOCKET TG-240761
6 DTG ENTERPRISES, INC.)
7 v.) PETITION TO INTERVENE OF
8 Washington Utilities and Transportation) WASHINGTON REFUSE
9 Commission) AND RECYCLING
10) ASSOCIATION
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11 The Washington Refuse and Recycling Association (WRRRA) respectfully petitions to
12 intervene in the above matter pursuant to WAC 480-07-355, and in doing so alleges as follows:

13 1) Proposed intervenor's address is: 4160 - 6th Ave. SE, Suite 205, Lacey, Washington
14 98503.

15 2) WRRRA is a trade association representing the vast majority of regulated solid waste
16 collection companies in Washington state. As such, it has taken part as a party, intervenor or
17 interested party in virtually every Utilities and Transportation Commission hearing regarding
18 solid waste since the inception of solid waste regulation. Matters involving regulation of the
19 solid waste industry are of interest to the members of WRRRA, who would not be parties in this
20 action. The issues presented in this action are of substantial interest to the solid waste industry in
21 Washington in general, and to all individual G-certificate holders who are members of WRRRA.
22 Any adjudication with the potential to set policy for the industry should include representation
23 from the regulated companies. WRRRA was granted intervention in the related Application
24 Dockets filed by DTG in TG-240583 & TG-240584. This docket shares many factual and legal
25 issues with the application proceedings.
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1 3) A trade association such as WRRRA is included in the definition of "person" in WAC
2 480-07-340(1)(a). WAC 480-07-355(1)(a) provides that "any person" may file a Petition to
3 Intervene.

4 4) WRRRA's participation as an intervenor in this action will not broaden the issues in the
5 matter. At this time, WRRRA does not intend to call any witnesses at hearing but reserves the
6 right to do so should issues brought by the primary parties result in the presentation of witnesses
7 by WRRRA being helpful to the Commission.

8 5) WRRRA's position in this action is expected to be in support of the Protestants.

9 6) Proposed intervenor's attorney is:

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11 Rod Whitaker, In-House Counsel
12 WRRRA
13 4160 6th Avenue SE, Ste.205
14 Lacey, WA 98503
15 Phone: 360-943-8859
16 e-mail: rod@wrra.org

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

19 Dated this 29th day of January 2025

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21 _____
22 Rod Whittaker
23 WSBA No. 48336
24 Attorney for Washington
25 Refuse and Recycling
26 Association