BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Penalty Assessment Against POINTS RECYCLING & REFUSE, LLC, in the Amount of \$100

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DOCKET NO. TG-061052

COMMISSION STAFF'S RESPONSE TO POINTS' APPLICATION FOR MITIGATION

Pursuant to WAC 480-07-370(1)(c), Commission Staff submits this response to Points' Application for Mitigation.

On July 5, 2006, the Washington Utilities and Transportation Commission assessed a penalty of \$100 against Points Recycling & Refuse, LLC (Points) for violating WAC 480-70-071. Points filed an Application for Mitigation on July 25, 2006. Staff opposes Points' Application for Mitigation for the reasons set forth in the attached declaration of Sheri Hoyt.

DATED this 3rd day of August, 2006.

Respectfully submitted,

ROB MCKENNA Attorney General

JENNIFER CAMERON-RULKOWSKI Assistant Attorney General Counsel for Washington Utilities and Transportation Commission