BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Application of

WASTE MANAGEMENT OF WASHINGTON, INC. D/B/A WM HEALTHCARE SOLUTIONS OF WASHINGTON

For an extension of Certificate G-237 for a Certificate of Public Convenience and Necessity to Operate Motor Vehicles in Furnishing Solid Waste Collection Service DOCKET TG-120033

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF ANSWER TO OBJECTIONS

1

The Staff of the Washington Utilities and Transportation Commission ("Staff") files this Answer to Objections in accordance with the Notice of Opportunity to File Answer to Objections issued on April 30, 2012.

2

On April 23, 2012, Protestants Washington Refuse and Recycling Association, Rubatino Refuse Removal, Inc., Consolidated Disposal Services, Inc., Murrey's Disposal, Inc., and Pullman Disposal Service, Inc. (collectively, "WRRA"), filed Objections to Paragraphs 6 and 8 of the Prehearing Conference Order issued on April 16, 2012. On April 26, 2012, Stericycle of Washington filed an Objection to Paragraph 8 of the Prehearing Conference Order.

3

Paragraph 6 of the Prehearing Conference Order directs the parties to submit briefing on a preliminary legal issue. As stated in Staff's Petition to Intervene, filed on April 18, 2012, Staff has an interest in that issue and will provide briefing in accordance with any schedule that the Commission desires.

Staff takes no position on the objections to Paragraph 8 of the Prehearing Conference

Order.

DATED this 4th day of May, 2012.

Respectfully submitted,

ROBERT M. MCKENNA Attorney General

FRONDA WOODS, WSBA #18728

Assistant Attorney General

Counsel for Washington Utilities and Transportation Commission Staff