BEFORE THE WASHINGTON STATE

UTILITIES AND TRANSPORTATION COMMISSION

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| In Re Application of:  BOBBY WOLFORD TRUCKING AND SALVAGE, INC.  22014 W. Bostian Rd.  Woodinville, WA 98072  Respondents. | Docket No. TG-152228  PETITION TO INTERVENE OF WASHINGTON REFUSE  AND RECYCLING  ASSOCIATION (WRRA) |

**COMES NOW** the Washington Refuse and Recycling Association (WRRA) 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) WRRA is a trade association representing the vast majority of solid waste haulers in Washington State. As such, it has taken part as a party, intervenor or interested party 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 WRRA, who would not be parties in this action. The issues presented in this action are of substantial interest to the solid waste industry in Washington in general, and to all individual G-certificate holders who are members of WRRA.

3) A trade association such as WRRA 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.

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

5) The issues in this application appear to include the regulatory fitness of Applicant, the ability of Protestant certificated haulers to provide specialized equipment when, and if, necessary, and whether or not there is a public need for the proposed service beyond services currently being provided by existing certificate holders. These, and other, issues affect all certificated haulers in Washington whether providing service within the areas specified in the Application or not, and thus is of importance to the entire regulated solid waste industry in Washington.

6) WRRA's position in this action is expected to be in support of the Protestants.

7) Proposed intervenor’s attorneys are:

James K. Sells, Attorney at Law

PMB 22

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Rod Whitaker, Attorney at Law

WRRA

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Lacey, WA 98503

Phone: 360-943-8859

e-mail: [rod@wrra.org](mailto:rod@wrra.org)

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

DATED this \_\_\_\_\_ day of August, 2016.

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James E. Ryan for (WSBA No 5807) James E. Ryan (WSBA No 5807)

For JAMES K. SELLS For ROD WHITTAKER

WSBA No. 6040 WSBA No. 48336

Attorney for Washington Refuse and Attorney for Washington Refuse and

Recycling Association Recycling Association

**CERTIFICATE OF SERVICE**

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

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| Washington Utilities and  Transportation Commission  1300 S. Evergreen Park Dr. SW  PO Box 47250  Olympia, WA 98504-7250  360.664.1160  records@utc.wa.gov | 🞎 Via Legal Messenger  🞎 Via Facsimile  🗹 Via U.S. Mail  ☑ Via Email |
| Bobby Wolford Trucking and Salvage  22014 W. Bostian Rd.  Woodinville, WA 98072 | 🞎 Via Legal Messenger  🞎 Via Facsimile  🗹 Via U.S. Mail  □ Via Email |
| Sally Brown  Assistant Attorney General  1400 S. Evergreen Park Dr. SW  PO Box 40128  Olympia, WA 98504-0218  360.664.1225  sbrown@utc.wa | 🞎 Via Legal Messenger  🞎 Via Facsimile  🗹 Via U.S. Mail  🗹 Via Email |
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DATED at Silverdale, Washington, this \_\_\_\_\_\_ day of August, 2016.

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Terre M. Skelly