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BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION

In Re Application of:

Docket No. TG-152228

BOBBY WOLFORD TRUCKING AND
SALVAGE, INC.

22014 W. Bostian Rd.
Woodinville, WA 98072

PETITION TO INTERVENE OF
WASHINGTON REFUSE
AND RECYCLING
ASSOCIATION (WRRRA)

Respondents.

COMES NOW the Washington Refuse and Recycling Association (WRRRA) 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) WRRRA 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 WRRRA, 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 WRRRA.

3) A trade association such as WRRRA is included in the definition of "person" in WAC 480-07-340(1)(a). WAC 480-07-355(1)(a) provides that "any

1 person" may file a Petition to Intervene.

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

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

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


17 7) Proposed intervenor's attorneys are:


18 James K. Sells, Attorney at Law
19 PMB 22
20 3110 Judson Street
21 Gig Harbor, WA 98335
22 Phone: 360.981.0168
23 e-mail: jamessells@comcast.net

Rod Whitaker, Attorney at Law
WRRRA
4160 6th Avenue SE, Ste.205
Lacey, WA 98503
Phone: 360-943-8859
e-mail: rod@wrrra.org

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

26 DATED this 23 day of August, 2016.

27 
28 _____
29 James E. Ryan for (WSBA No 5807)
30 For JAMES K. SELLS
31 WSBA No. 6040
32 Attorney for Washington Refuse and
33 Recycling Association



James E. Ryan (WSBA No 5807)
For ROD WHITTAKER
WSBA No. 48336
Attorney for Washington Refuse and
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.

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	<input type="checkbox"/> Via Legal Messenger <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via Email
Bobby Wolford Trucking and Salvage 22014 W. Bostian Rd. Woodinville, WA 98072	<input type="checkbox"/> Via Legal Messenger <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via U.S. Mail <input type="checkbox"/> 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	<input type="checkbox"/> Via Legal Messenger <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via Email
Polly L. McNeill, WSBA 17437 Sara A. Kelly, WSBA 42409 315 5 th Ave. S., Ste. 1000 Seattle, WA 98104-2682 206-676-7000 pollym@summitlaw.com	<input type="checkbox"/> Via Legal Messenger <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via Email
Jim Hutchinson Republic Services 1600 127 th Ave. N.E. Bellevue, WA 98005 425-221-1391 jhutchinson@republicservices.com	<input type="checkbox"/> Via Legal Messenger <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via Email

DATED at Silverdale, Washington, this 23rd day of August, 2016.


Terre M. Skelly