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BEFORE THE WASHINGTON UTILITIES
AND TRANSPORTATION COMMISSION

WASTE CONNECTIONS OF
WASHINGTON, INC.,

Complainant,

vs.

ENVIRO/CON & TRUCKING, INC., a
Washington corporation; ENVIROCON,
INC., a corporation; and WASTE
MANAGEMENT DISPOSAL SERVICES
OF OREGON, INC.,

Respondents.

Case No.: TG-071194

PETITION TO INTERVENE
OF WASHINGTON REFUSE
AND RECYCLING ASSOCIATION

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 over 30 solid waste haulers in Washington state. As such, it has taken part as a party or intervenor 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 issue herein, i.e., the alleged unlawful

1 transportation and disposal of solid waste, is of vital importance to WRRRA's
2 members.

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

6 4) WRRRA does not intend to broaden the issues in this matter.

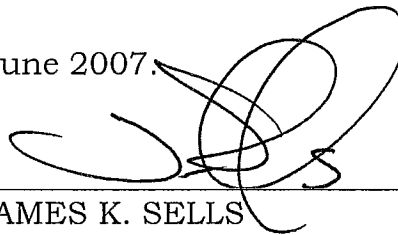
7 5) WRRRA's position with respect to the matter in controversy will be
8 the same as that of Complainant, Waste Connections of Washington, Inc.

9 6) Proposed intervenor's attorney is:

10 James K. Sells
11 Ryan Sells Uptegraft, Inc. P.S.
12 9657 Levin Rd. NW, Suite 240
13 Silverdale, WA 98383
14 Phone: 360.307.8860
15 Fax: 360.307.8865
16 e-mail: jimsells@rsulaw.com

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

19 DATED this 13 day of June 2007.



20 JAMES K. SELLS
21 WSBA No. 6040
22 Ryan Sells Uptegraft, Inc. P.S.
23 9657 Levin Rd. NW, Suite 240
24 Silverdale, WA 98383
25 Attorneys for Washington Refuse
26 and Recycling Association


1 **CERTIFICATE OF SERVICE**

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

5 6 7 8 9 10 <i>Attorneys for Complainant Waste Connections of Washington, Inc.</i> David W. Wiley Jacob M. Downs Williams Kastner PO Box 21926 Two Union Square 601 Union Street Seattle, WA 98111-3926 DWiley@williamskastner.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
11 12 Waste Management Disposal Services of Oregon, Inc. 5330 N.E. Skyport Way Portland, Oregon 97218	<input type="checkbox"/> Via Legal Messenger <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via U.S. Mail
13 14 15 16 17 <i>Attorneys for Waste Management Disposal Services of Oregon, Inc.</i> Polly L. McNeill Summit Law Group 315 – 5th Avenue S. Seattle, Washington 98104 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
18 19 20 Enviro/Conn & Trucking, Inc. PNB 509 26910 92nd Avenue NW, Suite C5 Stanwood, Washington 98292	<input type="checkbox"/> Via Legal Messenger <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via U.S. Mail
21 22 23 <i>Registered Agent for Enviro/Con & Trucking, Inc.</i> RSC Corp. 1201 3rd Avenue, Suite 3400 Seattle, Washington 98101-3034	<input type="checkbox"/> Via Legal Messenger <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via U.S. Mail
24 25 26 Envirocon, Inc. 3330 NW Yeon Ave., Suite 240 Portland, OR 97210	<input type="checkbox"/> Via Legal Messenger <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via U.S. Mail

<p>1 <i>Registered Agent for Envirocon, Inc.</i> 2 C T Corporation System 3 1801 West Bay Drive NW, Suite 206 4 Olympia, Washington 98502</p>	<p><input type="checkbox"/> Via Legal Messenger <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via U.S. Mail</p>
<p>4 Bronson Potter 5 Deputy Prosecuting Attorney 6 Clark County Prosecuting Attorney's Office 7 Civil Division 8 P.O. Box 5000 9 Vancouver, WA 98666-5000 10 bronson.potter@clark.wa.gov</p>	<p><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</p>

9 DATED at Silverdale, Washington, this 14th day of June, 2007.

10 
11 _____
12 Cheryl L. Sinclair