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DARRELL D. UPTGRAFT, JR.  
GORDON L. WALGREN  
*Of counsel*

September 11, 2003

ANNE M. MONTGOMERY  
MARTIN D. McLEAN

Ms. Carole Washburn  
Executive Secretary  
Washington Utilities and  
Transportation Commission  
P. O. Box 47250  
Olympia, WA 98504-7250

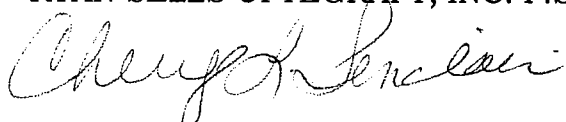
**Re: Application of Northland Investments, LLC  
d/b/a Call and Haul  
No. TG-030811  
GA-079176**

Dear Ms. Washburn:

Enclosed for filing in the captioned matter are an original and three copies of **Protest of Washington Refuse & Recycling Association** as well as **Protest of Sunshine Disposal, Inc.**

Very truly yours,

RYAN SELLS UPTGRAFT, INC. P.S.



Cheryl L. Sinclair  
Secretary to  
JAMES K. SELLS

encs.

cc: Washington Refuse and  
Recycling Association/enc.  
Sunshine Disposal, Inc./enc.

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RECORDS MANAGEMENT  
03 SEP 12 AM 8:13  
STATE OF WASH.  
UTIL. AND TRANSP.  
COMMISSION

RECEIVED  
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03 SEP 12 AM 8:18

STATE OF WASH.  
UTIL. AND TRANSP.  
COMMISSION

BEFORE THE WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION

In Re Application of

NORTHLAND INVESTMENTS LLC  
d/b/a CALL AND HAUL

NO. GA 079176  
TG 030811

PROTEST OF SUNSHINE DISPOSAL, INC.

**COMES** now Protestant, SUNSHINE DISPOSAL, INC., holder of WUTC Certificate G-199, by and through its attorney, JAMES K. SELLS, 9657 Levin Rd. N.W., Suite 240, Silverdale, Washington 98383, and pursuant to WAC 480-70-106 protests the above-referenced application which seeks authority for:

Solid Waste Collection Service consisting of yard waste and construction and demolition debris in Spokane County.

and in doing so, alleges and prays as follows:

1) Sunshine Disposal, Inc. is the holder and/or operator of Solid Waste Certificate No. G-199, attached hereto as Exhibit A. As said exhibit indicates, Protestant currently holds authority in conflict with and which partially overlaps the applied-for solid waste authority.

2) Protestant, as the holder of an overlapping solid waste certificate, therefore alleges it has a direct, cognizable interest in this proceeding adverse to this application, and further alleges that the applicant is unable to establish Sunshine Disposal, Inc. will not provide service to the satisfaction of the Commission, that the applicant is fit,

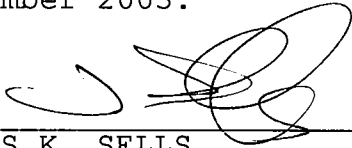
1 willing and able to provide the proposed service, and/or that the  
2 applicant's service is required by the present or future public  
3 convenience and necessity, as mandated by RCW 81.77.040.

4 3) Pursuant to its authority under its permanent solid  
5 waste certificate, Protestant is ready, willing and able to  
6 provide all of the collection and transportation services to the  
7 generating public sought by applicant. Protestant has invested  
8 significant funds serving its regulated solid waste collection  
9 customers. The regulated solid waste collection service proposed  
10 by applicant is not required by the public convenience and  
11 necessity. Moreover, Sunshine Disposal, Inc. alleges that this  
12 applicant cannot establish its fitness to conduct operations, its  
13 compliance with Washington law and rules and/or that its service  
14 would be consistent with the public interest or required by the  
15 present or future public convenience and necessity under RCW  
16 81.77.040.

17 4) Protestant testifies that it will appear at any hearing  
18 on this matter and will present evidence through approximately  
19 two witnesses, requiring an estimated hearing time of two hours.

20 **WHEREFORE**, Sunshine Disposal, Inc., Protestant herein, prays  
21 that its right to participate in the entirety of Application GA-  
22 079176 be fully affirmed, is currently unaware of any restrictive  
23 amendment which would or could satisfy its interest herein, and  
24 therefore asks that Application No. GA-079176 of Northland  
25 Investments LLC be denied in its entirety.

26 DATED this 8 day of September 2003.

27   
28 \_\_\_\_\_  
JAMES K. SELLS  
WSBA No. 6040  
Attorney for Protestant

CERTIFICATE OF SERVICE

1 I hereby certify that on this day a true copy of the  
2 foregoing Protest of Sunshine Disposal, Inc. was served by first  
3 class mail, postage prepaid, on:

4 Northland Investments LLC  
5 d/b/a Call and Haul  
6 1923 E. Saint Maries  
7 PO Box 3058  
8 Coeur D'Alene, ID 83816

9 I swear under the penalty of perjury of the laws of the  
10 State of Washington that the foregoing is true and correct.

11 DATED: September 11, 2003.

12   
13 \_\_\_\_\_  
14 Cheryl L. Sinclair

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**For the Operation of Motor Propelled Vehicles**

pursuant to the provisions of Chapter 81 RCW

THIS IS TO CERTIFY that authority is granted to operate as a MOTOR CARRIER in the transportation of the commodities and in the territory described herein to

Sunshine Disposal, Inc.  
1415 NW Ballard Way  
Seattle, WA 98107

CERT. NO.  
G-199

D-1

GARBAGE AND REFUSE COLLECTION SERVICE, limited to service in containers of twenty (20) cubic yard capacity or over in that portion of Spokane County described as follows: The territory bounded on the west by Havana Street (the easterly city limits of the City of Spokane); on the north by Rowan Avenue extended; on the east by the Idaho-Washington State line and on the south by 40th Avenue extended. Also, Sections 25, 26, 35 and 36, T. 26 N., R. 45 E., and Sections 30 and 31, T. 26 N., R. 46 E.; and within the corporate city limits of Spokane as of September 1, 1962, PROVIDED: Service permitted in Spokane does not authorize the duplication of or any encroachment on services rendered by the City of Spokane or contracted for by it.

M. V. G. No. 1147

8-24-83

WASHINGTON UTILITIES AND TRANSPORTATION  
COMMISSION

By Thomas Tischer

Exhibit A

