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RYAN SELLS UPTEGRAFT, INC. P.S.

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ANNE M. MONTGOMERY

October 25, 2004

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GORDON L. WALGREN
Of Counsel

Ms. Carole Washburn
Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Dr. SW
P. O. Box 47250
Olympia, WA 98504-7250

**Re: Docket No. TG-041481
WUTC v. T&T Recovery**

RECEIVED
RECORDS MANAGEMENT
04 OCT 27 AM 8:53
STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

Dear Ms. Washburn:

Enclosing for filing are an original and three copies of Petition to Intervene of Washington Refuse and Recycling Association.

Very truly yours,

RYAN SELLS UPTEGRAFT, INC. P.S.



Cheryl L. Sinclair
Secretary to
JAMES K. SELLS

encs.

cc: Mr. Brad Lovaas (via e-mail)

04 OCT 27 AM 8:53

STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Petitioner,

v.

T&T RECOVERY, INC.

Respondent.

DOCKET NO. TG-041481

PETITION TO INTERVENE OF
WASHINGTON REFUSE AND
RECYCLING ASSOCIATION

COMES NOW Washington Refuse and Recycling Association, by and through its attorney, JAMES K. SELL of Ryan Sells Uptegraft, Inc. P.S., 9657 Levin Road NW, Suite 240, Silverdale, WA 98383, and petitions for intervention in the above-referenced matter pursuant to WAC 480-07-355, and in doing so alleges interest in the proceeding as follows:

1) Washington Refuse and Recycling Association is a trade association representing over 70 solid waste carriers in the State of Washington. As such, it has taken part as an intervenor or protestant in virtually every Washington Utilities and Transportation Commission hearing regarding solid waste since the onset of solid waste regulation. Matters involving solid waste which are heard by the Commission are of interest to the solid waste industry as a whole and of specific interest to the members of the Washington Refuse and Recycling Association.

2) Trade associations are granted potential party status in WUTC

1 proceedings pursuant to RCW 70.95.030, WAC 480-07-340(1), WAC 480-70-041
2 and WAC 480-07-355.

3 3) This action is of particular interest as it involves "illegal hauling,"
4 which is a matter which is of concern to the solid waste industry in Washington
5 as a whole, and the resolution of which will affect each and every solid waste
6 hauler in the state.

7 4) Participation by Washington Refuse and Recycling Association will
8 not broaden the issues necessary for resolution herein, nor will it lengthen the
9 hearing.

10 **WHEREFORE**, Washington Refuse and Recycling Association respectfully
11 requests it be allowed to participate as an intervenor in this matter.

12 DATED this 25 day of October 2004.



13 JAMES K. SELLS
14 WSBA No. 6040
15 Ryan Sells Uptegraft, Inc. P.S.
16 9657 Levin Rd. NW, Suite 240
17 Silverdale, WA 98383
18 Attorney for Petitioner Washington
19 Refuse and Recycling Association
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CERTIFICATE OF SERVICE

I hereby certify that on this day a true copy of the foregoing PETITION TO INTERVENE OF WASHINGTON REFUSE AND RECYCLING ASSOCIATION was served by first class mail, postage prepaid, on:

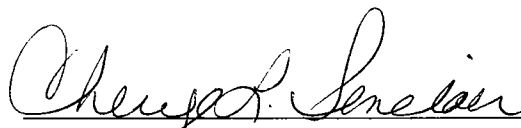
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
P. O. Box 47250
Olympia, WA 98504-7250

Lisa Watson
Assistant Attorney General
1400 S. Evergreen Park Dr. SW
PO Box 40128
Olympia, WA 98504-0128

James M. Van Nostrand
Stoel Rives, LLP
900 SW Fifth Ave., Suite 2600
Portland, OR 97204

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

DATED this 25th day of October 2004 at Silverdale, Kitsap County, Washington.


Cheryl L. Sinclair