



STATE OF WASHINGTON

UTILITIES AND TRANSPORTATION COMMISSION

1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250

(360) 664-1160 • TTY (360) 586-8203

July 20, 2017

Steven V. King, Executive Director and Secretary  
Utilities and Transportation Commission  
1300 S. Evergreen Park Dr. SW  
P.O. Box 47250  
Olympia, WA 98504-7250

RE: *Washington Utilities and Transportation Commission v. Ace Relocation Systems, Inc.*

Commission Staff's Response to Application for Mitigation of Penalties TV-170504

Dear Mr. King:

On June 30, 2017, the Utilities and Transportation Commission issued a \$1,000 Penalty Assessment in Docket TV-170504 against Ace Relocation Systems, Inc. for 10 violations of Washington Administrative Code (WAC 480-15-480), which requires household good companies to furnish annual reports and the regulatory fee to the commission no later than May 1 each year.

On July 5, 2017, Ace Relocation Systems, Inc. wrote the commission requesting mitigation of penalties. In its mitigation request, Ace Relocation Systems, Inc. does not dispute the violation occurred. The company states, "...we never received the WA UTC Form and we have new update systems. Somehow, we missed it until we received your letter. Please note that in the last 10 years, we have never filed late.

It is the company's responsibility to ensure that the regulatory fee is paid and the annual report is filed by the May 1 deadline. On February 28, 2017, Annual Report packets were sent to all regulated household good companies. The instructions page informs the regulated company that it must complete the annual report form and pay the regulatory fees, and return the materials by May 1, 2017, to avoid enforcement action.

The company filed their complete annual report on July 5, 2017 and the regulatory fee was paid on July 6.

The Commission will only grant mitigation if the violations occurred due to circumstances beyond the company's control. Ace Relocation Systems, Inc. did not illustrate that they were unable to file their annual report and pay their regulatory fee due to circumstances beyond their

UTC Annual Reports

July 20, 2017

Page 2

control, and typically, mitigation would not be recommended. However, as the company noted, this is the first time the company filed a late annual report since 2006. In consideration of the company's long running compliance, staff recommends that the penalty be reduced to \$500.

If you have any questions regarding this recommendation, please contact Sean Bennett, Regulatory Analyst, at (360) 664-1157, or [sbennett@utc.wa.gov](mailto:sbennett@utc.wa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark L. Johnson', written in a cursive style.

Mark L. Johnson, Director  
Administrative Services