



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

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July 7, 2022

NOTICE OF OPPORTUNITY TO SUBMIT WRITTEN COMMENTS
(By August 5, 2022, at 5 p.m.)

RE: Inquiry to determine the appropriateness of updates to Tariff 15-C

TO ALL INTERESTED PERSONS:

On July 2, 2021, Clutter, Inc. (Clutter) filed with the Utilities and Transportation Commission (Commission) a petition to revise Tariff 15-C in Docket TV-210535. On October 11, 2021, the Washington Movers Conference (WMC) filed a petition to revise Tariff 15-C in Docket TV-210812. On January 25, 2022, a Notice of Consolidation and Opportunity to Submit Written Comment was sent to the industry and interested parties.

The Commission held a workshop on May 5, 2022. Present were members of Commission Staff (Staff), Public Counsel, industry representatives, companies, and other interested parties. During the workshop it was determined that more detailed commercial information was necessary for Staff to evaluate the proposed changes to Tariff 15-C. Staff prepared a list of questions which was sent to all parties who had previously provided comments under the consolidated dockets on May 16, 2022. In the interest of more fully developing the record as it pertains to the Clutter and WMC petitions, Staff has decided to: (1) reissue the questions sent on May 16, 2022; (2) extend the comment period to August 5, 2022; and (3) expand the notice to all household goods companies. In the absence of the requested data, Staff will need to rely on other sources of data to develop its recommendation regarding the Clutter and WMC petitions.

During the workshop, participants raised the issue of confidentiality regarding potentially sensitive commercial information related to household goods companies. After further review, it is Staff's position that if such information was subject to a public records request, there is no exemption to the Public Records Act that would allow the Commission to redact commercial information. As such, any information submitted under these dockets could be subject to public

disclosure. Although the Commission encourages the parties to provide as much information as possible to better develop the record in this proceeding, responding parties may consider aggregating or redacting any personally identifiable information or other sensitive commercial information.

REQUEST FOR INFORMATION AND QUESTIONS FOR CONSIDERATION

The Commission requests the following information related to household goods moves conducted within Washington State:

1. Total annual fuel expenses for 2019, 2020, and 2021, as well as the most recent months available.
2. Total annual payroll expenses for 2019, 2020, and 2021, as well as the most recent months available, separated by drivers, helpers, and administrative staff, if available.
3. Total annual vehicle expenses (including vehicle leases, and/or depreciation expense, but excluding fuel expenses) for 2019, 2020, and 2021, as well as the most recent months available.
4. Total equipment and materials expenses (including packing materials) for 2019, 2020, and 2021, as well as the most recent months available.
5. Total operating expenses for 2019, 2020, and 2021, as well as the most recent months available.
6. Any other relevant expense account which has not been previously mentioned, for the years 2019, 2020, and 2021, as well as the most recent months available.
7. Total revenues for 2019, 2020, and 2021, as well as the most recent months available, separated by regulated and non-regulated revenues.
8. Please provide additional information related to the competitive marketplace in which the household goods moving industry operates (e.g., service areas that are served by multiple household goods moving companies).
9. How do you currently estimate travel time back to the yard after a job (i.e. Google Maps, GPS, etc.)?
10. If you over or underestimate the travel time, do you perform a billing correction?
11. Please provide the percentage of total household goods moves conducted on a weekend, holiday, or before 8 AM or after 5 PM Monday through Friday, for the year 2021.
12. Tariff 15-C allows for overtime charges in Items 50 and 190, which apply to the same time periods as moves that would require a 4-hour minimum. Please explain why a 4-hour minimum is necessary when these overtime charges are also allowed for moves that occur before 8 AM or after 5 PM Monday through Friday or on weekends and holidays.

WRITTEN COMMENTS

Written comments and/or data filed in response to this Notice must be filed with the Commission no later than 5 p.m. on August 5, 2022, and must be submitted in electronic form, pursuant to WAC 480-07-250(3). Those comments must be submitted via the Commission's web portal at www.utc.wa.gov/e-filing as provided in WAC 480-07-140(5). If you are unable to submit documents via the web portal, you may submit your comments by email to the Commission's

Records Center at records@utc.wa.gov or by mailing an electronic copy to the Commission's Records Center on a flash drive, DVD, or compact disc that includes the filed document(s). Comment submissions should include:

- The docket numbers of this consolidated proceeding (TV-210812 and TV-210535).
- The commenting party's name.
- The title and date of the comments.

The Commission will post all written comments on its website at the following URL address: www.utc.wa.gov.

If you have questions about this Notice, you may contact the Consumer Protection division at householdgoods@utc.wa.gov.

Amy Andrews on behalf of
AMANDA MAXWELL
Executive Director and Secretary