

Attn: Kathy Hunter, Acting Executive Director and Secretary

Docket TV – 210812 & TV – 210535

Jan. 10, 2024

Letter in support of eliminating the Maximum Rate Band and maintain a reasonable Minimum Rate Band

The underlying theme of my following comments on the proposed changes to Tariff 15-C is that the Household Goods Moving industry is unlike any other UTC regulated industry. When you are a natural gas customer, you are serviced by a monopolistic provider for your geographic area. You cannot opt for Bob's Discount Natural Gas, whose business strategy is undercutting Puget Sound Energy to secure your business, or choose a provider who supplies only the highest quality natural gas at a premium price because that is what you value. Your natural gas is only available from one vendor – which is why the Utilities and Transportation Commission is necessary to protect the consumer.

A Household Goods Mover is far from being a monopolistic player and must compete on a daily basis with competitors, some licensed and some not, offering a wide range of services of varying quality and reputation at a wide range of prices. For example, a consumer who has expensive antiques or custom-made furniture might reasonably choose a higher priced mover in order to secure a higher level of service versus a recent college graduate who wants their second-hand or Ikea furniture moved at the lowest possible price.

Unlike other UTC governed entities, movers do not have the luxury of submitting increases to customers that have no ability to change service providers to make up for past losses due to unexpected increases in costs. Once a move is completed the bill is paid. Any shortcoming in revenue might come years later after rate studies and delays in decisions but the losses have already occurred and never recovered. Extraordinary, unforeseen cost increases incurred between UTC rate determinations cannot be retroactively applied to past moving customers unlike with the static customer base of your typical regulated utilities.

With the ever-increasing expenses in all areas of the economy, movers need the ability to adjust rates in a timely manner just like any other service provider in a highly competitive business. In addition to the required information disclosures from the UTC, the vast majority of consumers have access to a treasure trove of information on the internet so they can do additional research. Most importantly, they are supplied with detailed information by the licensed mover on what services will be supplied for their particular move and the cost for each of those services. All this information is supplied before the move and acknowledged by the consumer so there should be no misunderstanding on what services or expenses are anticipated and their associated costs which protects both the consumer and the licensed mover.

We completely agree with the points the WA Movers Conference has communicated which are listed below.

1. Allow regulated HHG moving companies to charge rates and fees acceptable to consumers and allow HHG carriers an appropriate level of growth while meeting and supporting the needs of the consumer.
2. Protect Consumers by allowing them the ability to concur or not with offered moving and storage rates and fees for their move by agreeing to and signing the moving company's completed Intrastate Estimated Costs for Services following a visual review of the customer's goods to be moved prior to the start of the move.
3. Provide the regulated HHG Moving and Storage carriers the flexibility to quickly adjust to operational cost increases imposed at the State, County, and City level governments and industry suppliers.
4. Provide the regulated moving carriers with the ability to implement regular vehicle and equipment maintenance/replacement targets to insure safe operations on Washington's highways and the protection of consumers goods.
5. Provide the regulated moving carriers with the ability to include fuel increases and likely State imposed low carbon fuel taxes and/or conversions to alternate fuel vehicles should they become required as is now being discussed.
6. Provide regulated moving companies with the ability to pay their employees a reasonable family wage, including appropriate benefits, thereby maintaining an adequate, well trained work force.

7. Would eliminate the need for costly UTC HHG Tariff No. 15-C rate studies by allowing smart moving business owners the ability to quickly react to market conditions in a timely manner.

Please allow movers the ability to immediately adjust their rates, when the need arises, to operate their business in a highly competitive market just like electricians, plumbers, roofers, and many other business owners in similar situations.

Thank you,  
Larry Nelsen  
President  
Hansen Bros. Transfer and Storage Co. Inc.