

BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION

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	)	
WASHINGTON UTILITIES AND	)	DOCKET NO. TV-051478
TRANSPORTATION COMMISSION,	)	
	)	
Complainant,	)	
	)	NARRATIVE SUPPORTING
v.	)	SETTLEMENT AGREEMENT
	)	
NEIGHBORS MOVING & STORAGE OF	)	
SEATTLE, LLC,	)	
	)	
Respondent.	)	
_____	)	

**I. INTRODUCTION**

1           This Narrative Supporting Settlement Agreement (Narrative) is filed pursuant to  
WAC 480-07-740(2)(a) on behalf of both Neighbors Moving and Storage of Seattle, LLC,  
(Neighbors) and the Staff of the Utilities and Transportation Commission (staff). Both  
parties have signed the Settlement Agreement, which is attached as Exhibit 1.

**II. SCOPE OF THE UNDERLYING DISPUTE**

2           The underlying dispute concerned penalties assessed by the commission against  
Neighbors. In the spring of 2005, staff performed a compliance audit of the business  
practices of Neighbors. Staff found violations of laws and rules enforced by the commission  
and compiled their findings along with technical assistance and recommendations in an audit  
report dated July 2005. In conjunction with the report, staff assessed penalties against

Neighbors for the types of violations that staff believed had been previously addressed with technical assistance.

3           In response to the penalty assessment, Neighbors filed a request for hearing, stating its position that the penalty was excessive and not in the interest of the consumers of Washington State, and asking for an opportunity to discuss settlement with staff.

4           The parties entered into settlement discussions covering all of the assessed penalties and negotiated an agreement.

### **III. DESCRIPTION OF PROPOSED SETTLEMENT**

5           The settlement resolves all issues in the dispute and reduces the penalties for some of the violations. Please see the attached Settlement Agreement at paragraph 6 for a breakdown of the settlement amount per violation.

### **IV. STATEMENT OF PARTIES' INTERESTS AND THE PUBLIC INTEREST**

6           As stated in the Settlement Agreement, the settlement represents a compromise of the positions of the two parties. The parties find it is in their best interests to avoid the expense, inconvenience, uncertainty, and delay necessitated by ongoing adversarial proceedings. Likewise, it is in the public interest that this dispute conclude without the further expenditure of public resources on protracted litigation.

**V. LEGAL POINTS THAT BEAR ON PROPOSED SETTLEMENT**

7 In WAC 480-07-700, the commission expresses its support for parties’ informal efforts to resolve disputes without the need for contested hearings when doing so is lawful and consistent with the public interest. The parties have resolved all of the issues in dispute between them, and their resolution complies with commission rules and, as explained above, is consistent with the public interest.

**VI. CONCLUSION**

8 Because the parties have negotiated a compromise on all of the issues in this dispute and because the settlement is in the public interest, both parties request that the commission approve the attached Settlement Agreement.

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION

NEIGHBORS MOVING & STORAGE  
OF SEATTLE, LLC

ROB MCKENNA  
Attorney General

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JENNIFER CAMERON-RULKOWSKI  
Assistant Attorney General  
Counsel for the Washington Utilities and  
Transportation Commission

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STEPHEN T. REINMUTH  
Counsel for Neighbors Moving &  
Storage of Seattle, LLC

Dated: \_\_\_\_\_, 2006.

Dated: \_\_\_\_\_, 2006.