



STATE OF WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION

621 Woodland Square Loop S.E. • Lacey, Washington 98503

P.O. Box 47250 • Olympia, Washington 98504-7250

(360) 664-1160 • TTY 1-800-833-6384 or 711

January 15, 2021

**NOTICE OF REQUIRING COMMISSION STAFF RESPONSE TO  
REQUEST FOR RECONSIDERATION  
(Response due by 5 p.m., Friday, January 22, 2021)**

RE: *In the Matter of Determining the Proper Carrier Classification of, and Complaint for Penalties Against, Chris Robert Miller, d/b/a Silver Limousine and Silver Transportation.*  
Docket TE-180455

TO ALL PARTIES:

On November 7, 2019, the Washington Utilities and Transportation Commission (Commission) entered Order 01, Order Instituting Special Proceeding; Complaint Seeking to Impose Penalties; and Notice of Mandatory Appearance at Hearing (Order 01). Order 01 alleged that Chris Robert Miller, d/b/a Silver Limousine and Silver Transportation, (Silver Limousine or Company) had advertised and offered household goods moving services in the state of Washington without the necessary permit. Order 01 scheduled a hearing for December 10, 2019. The Commission subsequently rescheduled the hearing, at the request of the Company, for March 3, 2020.

On February 28, 2020, Commission staff (Staff) filed a letter explaining that the parties had reached a settlement in principle and requesting that the parties cancel the hearing. The same day, the Commission issued a notice canceling the hearing, and on April 23, 2020, Staff filed a settlement agreement on behalf of the parties.

On April 24, 2020, the Commission entered Order 02, Approving Settlement; Classifying Respondent as a Charter and Excursion Carrier; Imposing Penalties (Order 02). Order 02 imposed a penalty, and required the Company to file jointly with Staff a mutually agreeable payment arrangement. On May 29, 2020, Staff filed an agreed payment schedule.

On June 9, 2020, the Commission entered Order 03, Granting Payment Arrangement (Order 03). Order 03 approved a payment arrangement of 40 monthly installments of \$250 beginning on November 18, 2020. Order 03 stated that the delayed initial payment and extended schedule was intended to account for the economic instability resulting from the COVID-19 pandemic and allowed for Silver Limousine to file a request for extension of the payment arrangement prior to the due date of any payment if it was unable to meet the payments due to the ongoing effects of the pandemic.

On January 5, 2021, Commission staff (Staff) filed a letter in this docket informing the Commission that Silver Limousine had failed to make the first two payments and had not filed a request for extension. In its letter, Staff requested the Commission cancel the payment arrangement.

On January 11, 2021, the Commission issued a letter canceling the payment arrangement.

On January 14, 2021, Silver Limousine submitted a letter (Request for Reconsideration), in which the Company states that it believes that its failure to submit a request for extension is a result of miscommunication with Staff combined with a technological failure. Silver Limousine states that it believed it had successfully submitted “the form” that was requested by Staff.

While the Request for Reconsideration does not explicitly say so, the Commission construes it as a request to reinstate the payment arrangement and grant an extension due to economic hardship resulting from the ongoing COVID-19 public health crisis.

**THE COMMISSION GIVES NOTICE THAT Commission Staff should file a response to the Request for Reconsideration no later than 5 p.m., Friday, January 22, 2021.**

MARK L. JOHNSON  
Executive Director and Secretary