



STATE OF WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION

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October 5, 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 each 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 make the payment 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. On January 14, 2021, Silver Limousine submitted a Request for Reconsideration to reinstate the payment arrangement and grant an extension due to economic hardship caused by the COVID-19 pandemic.

On January 28, 2021, the Commission issued Order 04, Reinstating Payment Arrangement (Order 04), which reinstated the payment arrangement consisting of 40 monthly installments of \$250 each and extended the initial payment due date until July 19, 2021. Order 04 further held that if Silver Limousine “fails to pay any installment by 5 p.m. on the date it is due without having filed an extension request in advance, the entire unpaid balance will immediately become due and payable without further order by the Commission.”

On September 24, 2021, Staff filed a letter in this docket informing the Commission that Silver Limousine had again failed to make the first three payments and had not filed a request for extension. In its letter, Staff recommends the Commission cancel the payment arrangement and impose the suspended penalty.

Due to Silver Limousine’s failure to comply with the terms of Order 04, the Commission finds good cause to cancel the payment arrangement. The entire \$10,000 outstanding balance of the penalty is due and payable immediately.

AMANDA MAXWELL  
Executive Director and Secretary