

Agenda Date: May 26, 2022  
Item Number: B1

**Docket:** TV-210535 and TV-210812 (consolidated)  
**Company Name:** Household Goods Movers Tariff 15-C

**Staff:** Greg Hammond, Regulatory Analyst, Water and Transportation

### **Recommendation**

Issue an order denying the Petition filed on May 10, 2022, by the Washington Movers Conference.

### **Discussion**

On July 2, 2021, Clutter, Inc., (Clutter) filed with the Utilities and Transportation Commission (Commission) a Petition to revise Household Goods Tariff 15-C (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, requesting removal of the maximum tariff rates. On October 14, 2021, the Commission issued Order 01 in Docket TV-210535, which granted Clutter several exemptions to Tariff 15-C and Commission rules and directed Commission Staff (Staff) to initiate a holistic review of Tariff 15-C.

On February 22, 2022, the Commission issued a Notice of Consolidation and Opportunity to Submit Comments, consolidating Docket TV-210535 and Docket TV-210812 and requesting comments from stakeholders regarding the proposals brought forth in both petitions. After written comments were received, the Commission held a workshop on May 5, 2022, with Clutter, WMC, industry representatives, and interested stakeholders. During the workshop Staff determined that more detailed commercial information was necessary to evaluate the proposed changes to Tariff 15-C. On May 16, 2022, Staff issued a supplemental notice, requesting additional information to expand the record and help Staff develop a recommendation regarding the proposed tariff changes.

On May 10, 2022, the WMC filed a Petition requesting a waiver from the maximum rates listed in Tariff 15-C for a period of six months. The May 10, 2022, petition contains arguments that are similar or identical to those presented in WMC's October 11, 2021, petition, but provides no additional supporting data or commercial information. Given the lack of additional detailed information regarding household goods company costs, Staff does not believe that WMC has demonstrated that a 6-month exemption from maximum rates would be consistent with the public interest or the purposes underlying regulation.<sup>1</sup> Furthermore, although the petition requests a "6-month study of operating without a maximum rate band," it does not identify the parameters or design of the study. There is no discussion of what data would be tracked and

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<sup>1</sup> WAC 480-07-110.

reported, or how such data would be evaluated in order to determine whether the maximum rate band should be permanently lifted or remain in effect. As such, even if WMC's study was implemented, it is unclear how the study would help the Commission evaluate whether to permanently remove the maximum rate under Tariff 15-C. Finally, Staff is currently reviewing the October 11, 2021, petition as part of this consolidated docket and requested additional information from the industry on May 16, 2022. Staff believes it would be preferable to review current industry information before attempting to gather new information pursuant to a pilot study, as a review of existing information may be sufficient to develop a recommendation or otherwise highlight information necessary to develop a recommendation.

Therefore, Staff recommends that the Commission reject the Petition filed by the WMC on May 10, 2022.

### **Conclusion**

Issue an order denying the Petition filed on May 10, 2022, by the Washington Movers Conference.