

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of a Penalty Assessment Against  CAN'T STOP MOVING, LLC  in the amount of \$51,900	DOCKET TV-170293 <i>(consolidated)</i>
In the Matter of the Investigation of  CAN'T STOP MOVING, LLC  For Compliance with WAC 480-15-560 and WAC 480-15-570	DOCKET TV-180319 <i>(consolidated)</i>  JOINT PROPOSAL FOR PAYMENT PLAN

**I. BACKGROUND**

1           On June 11, 2018, the Washington Utilities and Transportation Commission (“Commission”) entered Order 04 in Docket TV-170293 (*Consolidated*), In the Matter of the Penalty Assessment Against Can’t Stop Moving, LLC (“Can’t Stop Moving” or the “Company”) In the Amount of \$51,900, Order 02 in Docket TV-180319 (*Consolidated*), In the Matter of the Investigation of Can’t Stop Moving, LLC For Compliance with WAC 480-15-560 and WAC 480-15-570 (“Order 04”).

2           In Order 04, the Commission ordered that the suspended penalty amount of \$15,400 from Order 01 was due and payable. The Commission also ordered the assessment of a new \$28,600 penalty against the Company. The Commission ordered that the Company could request the Commission’s approval of a joint proposed payment plan for these amounts.

3           The Company approached Commission Staff (“Staff”) and requested to pay these penalty amounts through a payment plan. Staff supports the Company’s request. Now, the Company and Staff present a joint proposed payment plan for the payment of these amounts as well as the payment of the remainder of the existing payment plan approved by the Commission in Order 02. The Company and Staff request that the Commission approve this plan, which will combine all penalty amounts owed by the Company and replace the existing payment plan approved by the Commission in Order 02.

## II. PAYMENT PLAN

4           The Company requested paying the penalty amounts in 36 monthly installments. Staff supports the Company’s request. Each monthly payment will total \$1,350, except the last. The first eight installments will be divided between fulfilling the remaining balance of the payment plan approved by the Commission in Order 02 – \$500 per installment – and the penalty amounts imposed and assessed against the Company in Order 04 – \$850 per installment. Beginning with the ninth installment, the Company will continue to pay a total of \$1,350 in each installment. The entirety of the installment payments, beginning with the ninth, will go towards the penalty amounts imposed and assessed in Order 04. If no more than \$1,350 is paid each month, a final installment of \$750 will be required on June 15, 2021.

5           Please see the Company and Staff’s Proposed Installment Schedule, below, which specifies the deadline for each monthly installment and specifies how the installments are to be divided between the penalties imposed and assessed by Order 04 and the remaining balance of the payment plan approved by the Commission in Order 02.

Proposed Installment Schedule				
Installment	Due Date	Remaining Penalty Amount from Order 02	New Penalty Amount from Order 04	Monthly Total
1	July 16, 2018	\$500	\$850	\$1,350
2	August 15, 2018	\$500	\$850	\$1,350
3	September 17, 2018	\$500	\$850	\$1,350
4	October 15, 2018	\$500	\$850	\$1,350
5	November 15, 2018	\$500	\$850	\$1,350
6	December 17, 2018	\$500	\$850	\$1,350
7	January 15, 2019	\$500	\$850	\$1,350
8	February 15, 2019	\$500	\$850	\$1,350
9	March 15, 2019		\$1,350	\$1,350
10	April 15, 2019		\$1,350	\$1,350
11	May 15, 2019		\$1,350	\$1,350
12	June 17, 2019		\$1,350	\$1,350
13	July 15, 2019		\$1,350	\$1,350
14	August 15, 2019		\$1,350	\$1,350
15	September 16, 2019		\$1,350	\$1,350
16	October 15, 2019		\$1,350	\$1,350
17	November 15, 2019		\$1,350	\$1,350
18	December 16, 2019		\$1,350	\$1,350
19	January 15, 2020		\$1,350	\$1,350
20	February 17, 2020		\$1,350	\$1,350
21	March 16, 2020		\$1,350	\$1,350
22	April 15, 2020		\$1,350	\$1,350
23	May 15, 2020		\$1,350	\$1,350
24	June 15, 2020		\$1,350	\$1,350
25	July 15, 2020		\$1,350	\$1,350
26	August 17, 2020		\$1,350	\$1,350
27	September 15, 2020		\$1,350	\$1,350
28	October 15, 2020		\$1,350	\$1,350
29	November 16, 2020		\$1,350	\$1,350
30	December 15, 2020		\$1,350	\$1,350
31	January 15, 2021		\$1,350	\$1,350
32	February 15, 2021		\$1,350	\$1,350
33	March 15, 2021		\$1,350	\$1,350
34	April 15, 2021		\$1,350	\$1,350
35	May 17, 2021		\$1,350	\$1,350
36	June 15, 2021		\$750	\$750
<b>TOTALS</b>		<b>\$4,000</b>	<b>\$44,000</b>	<b>\$48,000</b>

6           The Company understands and agrees that it will pay each installment by the due date and that if it should fail to make a payment by the due date, the entire remaining balance of payments will become immediately due and payable without further Commission order.

### III. CONCLUSION

7           The Company requested and Staff now supports the establishment of a payment plan that would permit the Company to pay its total penalty amount in installments. The Company and Staff jointly request that the Commission approve the proposed payment plan, above.

DATED July 9<sup>th</sup>, 2018.

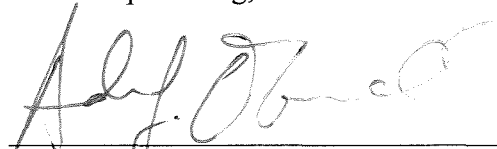
Respectfully submitted,



7/9/18

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ERIC MICHELSON  
Owner  
Can't Stop Moving, LLC



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Transportation Commission Staff