



Bob Ferguson
ATTORNEY GENERAL OF WASHINGTON

Public Counsel

800 Fifth Ave • Suite 2000 • MS TB-14 • Seattle, WA 98104-3188 • (206) 464-7744

May 20, 2022

State Of WASH.
UTIL. AND TRANSP.
COMMISSION

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SENT VIA WEB PORTAL

Amanda Maxwell
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Re: *Petition requesting a six-month study of operating without a Maximum Rate Band in Intrastate HHG Tariff No. 15-C on behalf of Washington Mover's Conference, Dockets TV-210535 and TV-210812 (consolidated), Comments of Public Counsel*

Dear Director Maxwell:

The Public Counsel Unit of the Washington State Attorney General’s Office (Public Counsel) respectfully submits these comments in response to the Washington Mover’s Conference (WMC) Petition requesting a six-month study of operating without a Maximum Rate Band in Intrastate HHG Tariff No. 15-C, filed on May 10, 2022, in consolidated Dockets TV-210535 and TV-210812. The Washington Utilities and Transportation Commission (UTC or Commission) opened Dockets TV-210535 and TV-210812 in response to separate petitions from Clutter, Inc. (Clutter) and the Washington Movers Conference (WMC) requesting revisions to Tariff 15-C. Public Counsel appreciates the opportunity to participate in these dockets and offers the comments below in response to WMC’s May 10, 2022, petition.

Public Counsel’s Recommendation

Public Counsel recommends that given the ongoing process within dockets TV-210535 and TV-210812, the Commission should deny WMC’s May 10, 2022, petition and allow UTC Staff and other stakeholders the opportunity to complete the revision of Tariff 15-C.

The Commission consolidated dockets TV-210535 and TV-210812 to address a number of issues in Tariff 15-C raised by stakeholders. Earlier this year, Public Counsel and other stakeholders

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To: Amanda Maxwell, Executive Director and Secretary
Re: Dockets TV-210535 and TV-210812 (*Consolidated*)
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had the opportunity to provide comments to the Commission on several issues, including minimum and maximum rate bands, the bill of lading, the definition of storage in transit, billing increments, and minimum hours billed. We also participated in the May 5, 2022, workshop to discuss the comments that we offered and hear from moving companies and other parties. UTC Staff subsequently issued another notice seeking comments and input from moving companies about the costs of providing various services. Those comments are due May 27, 2022.

Though we acknowledge that there are a variety of upward pressures on prices nationally, Public Counsel would like the opportunity for itself and for UTC Staff to review information specific to the moving companies operating in Washington. RCW 81.04.250 requires that rates established by the Commission must be based on cost of service. Thus, Public Counsel recommends that the Commission should deny WMC's May 10, 2022, petition to allow the existing revision process of Tariff 15-C to proceed.

If you have any questions about this filing, please contact Stephanie Chase at (206) 521-3212 or via e-mail at Stephanie.Chase@ATG.WA.GOV or Nina Suetake at the contact information, below.

Sincerely,

/s/ 

NINA SUETAKE, WSBA No. 53574
Assistant Attorney General
Public Counsel Unit
(206) 389-2055
Nina.Suetake@ATG.WA.GOV

NMS/SC/CM

Enclosures

cc: Service List (via E-mail)