



ANNE MARIE HOWELLS

Attorney and Counselor at Law

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August 27th, 2012

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. box 3265
Harrisburg, PA 17105-3265

Wayne T. Scott, Prosecutor
Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

RECEIVED

AUG 28 2012

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**RE: Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
VS: M & M Fuel Services, Inc.
DOCKET NO: C-2012-2319097
MY File No: 3071389**

Dear Ms. Chiavetta & Mr. Scott:

Please let this letter serve as both a response to the Complaint filed by David W. Loucks, Chief, of the Motor Carrier Enforcement Department and an explanation of this matter.

1. The respondent M & M Fuel Services, Inc., was no longer doing business at the time that the suspension became effective. The owner of the corporation Ralph E. J. McConnell passed away on March 1, 2012. The business ceased operation on May 3rd, 2012. At all times prior to May 3rd, 2012 the insurance coverage was in full effect.

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2. The respondent no longer maintains any type of business as the respondent is deceased. It is the Estate of Ralph E. J. McConnell who answers this complaint.

3. Admitted, that from October 25th, 2010 until the time of his death on March 1, 2012, the now deceased respondent operated a business under a Certificate of Public Convenience. The Estate of Ralph E. J. McConnell completed the liquidation of the business and ceased all operations on May 3rd, 2012.

4. Denied. For all times of operation the respondent and afterwards his Estate maintained Insurance up until and for a short period of time after the business ceased operation on May 3rd, 2012.

5. Denied. It is denied that the respondent, now deceased and his Estate thereafter failed to maintain evidence of insurance. It is further denied that respondent and now his Estate violated 66 Pa. C.S. §512; 52 Pa. Code §32.2(c); 52. Pa. Code §32.11(a), §32.12(a); §32.13(a) or any code of the Commission. At all times, continuing for a short period after the business was liquidated did the respondent, now deceased, and his Estate maintained Liability Insurance. The Insurance was cancelled after the business ceased operation.

I ask that you please waive the fee for the insurance matter, as in essence there was no business conducted after May 3rd, 2012.

Please review this answer and informal explanation of this matter. If you have any questions please do not hesitate to contact this office.

I shall await your response.

Sincerely,



Anne Marie Howells, Esquire

Cc: Linda McConnell, Executrix of the Estate of Ralph E. J. McConnell.

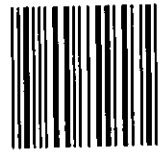
Enclosures

CERTIFIED MAIL

ANNE MARIE HOWELLS, ESQUIRE
307 West Market Street, Suite #1
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Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. box 3265
Harrisburg, PA 17105-3265

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