



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE
REFER TO OUR FILE

October 3, 2013

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

Re: Pennsylvania Public Utility Commission Bureau of Investigation and
Enforcement v. Northern Lehigh Ambulance Service, Inc.; C-2012-
2318310

Dear Secretary Chiavetta:

Enclosed for filing is an original copy of a **Petition for Leave to Withdraw the Bureau of Investigation and Enforcement's Complaint** in the above-referenced case. Copies have been served on the parties of record in accordance with the Certificate of Service.

Sincerely,

Heidi L. Wushinske
Prosecutor

Enclosure

cc: As per certificate of service

RECEIVED
2013 OCT -3 AM 11:10
SECRETARY'S BUREAU

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission, :
Bureau of Investigation and Enforcement :

v. :

C-2012-2318310

Northern Lehigh Ambulance Service, :
Inc. :

RECEIVED
2013 OCT -3 AM 11:13
SECRET

PETITION FOR LEAVE TO WITHDRAW
THE BUREAU OF INVESTIGATION AND ENFORCEMENT'S COMPLAINT

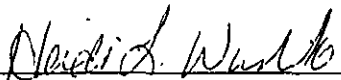
AND NOW comes the Bureau of Investigation and Enforcement (I&E) of the Pennsylvania Public Utility Commission (Commission), by and through its attorney, Heidi Wushinske, and files this Petition for Leave to Withdraw the Complaint in the above-captioned proceeding, pursuant to Section 5.94(a) of the Commission's regulations, 52 Pa. Code § 5.94(a). In support thereof, I&E states as follows:

1. On November 16, 2012, I&E filed a complaint against Northern Lehigh Ambulance Service, Inc. (Respondent) alleging that Respondent failed to maintain evidence of liability insurance on file with the Commission, in violation of 66 Pa. C.S. § 512, 52 Pa. Code § 32.2 (c), and 52 Pa. Code § 32.11(a), § 32.12(a) or § 32.13(a).
2. I&E requested that all authority issued to Respondent be suspended.
3. In addition, I&E requested that Respondent pay a civil penalty in the amount of \$500.
4. After this case was scheduled for hearing, I&E learned that Respondent is no longer operating and is in the process of exiting the public utility business.

5. Furthermore, Respondent has no intention to return to the public utility business.
6. Given that Respondent is no longer operating as a public utility and has no intention to resume business, I&E petitions to withdraw its complaint, without prejudice.

WHEREFORE, for the foregoing reasons, I&E respectfully requests that the Complaint in this proceeding be withdrawn and the matter marked closed.

Respectfully submitted,



Heidi L. Wushinske
Prosecutor
Attorney I.D. No. 93792

Counsel for the Pennsylvania
Public Utility Commission, Bureau of
Investigation and Enforcement

P.O. Box 3265
Harrisburg, PA 17105-3265
(717) 214-9594

DATED: October 3, 2013

RECEIVED
2013 OCT -3 AM 11:18
SECRETARY'S BUREAU

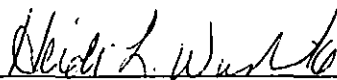
CERTIFICATE OF SERVICE

I hereby certify that I am this day serving the foregoing document, Petition for Leave to Withdraw the Bureau of Investigation and Enforcement's Complaint, upon the persons listed and in the manner indicated below, which service satisfies the requirement of 52 Pa.Code § 1.54 (relating to service by a participant):

Service by First Class Mail and Electronic Mail:

The Honorable Elizabeth H. Barnes
Pennsylvania Public Utility Commission
Office of Administrative Law Judge
P.O. Box 3265
Harrisburg, PA 17105-3265
ebarnes@pa.gov

NORTHERN LEHIGH AMBULANCE SERVICE INC
PO BOX 148
SLATINGTON PA 18080


Heidi L. Wushinske
Prosecutor
Attorney I.D. No. 93792

Counsel for the Pennsylvania
Public Utility Commission, Bureau of
Investigation and Enforcement

P.O. Box 3265
Harrisburg, PA 17105-3265
Phone: (717) 214-9594

Dated: October 3, 2013

RECEIVED
2013 OCT -3 AM 11:19
SECRETARY'S OFFICE