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**Also Admitted in Florida*

August 11, 2014

Re: Appalachian Movers, LLC
Docket No. A-2014-2418497

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

MAILED WITH U.S. POSTAL SERVICE
CERTIFICATE OF MAILING FORM 3817

Dear Ms. Chiavetta:

We enclose for filing with the Commission a Petition to Intervene in connection with the above-captioned application proceeding. We are serving a copy of this Petition on the applicant and on the other parties of record. We are also serving a copy of the Petition on the Chief Administrative Law Judge since an Administrative Law Judge has not yet been assigned to this application.

Please acknowledge receipt and filing of the enclosed on the duplicate copy of this letter of transmittal and return it to the undersigned in the self-addressed, stamped envelope provided.

Very truly yours,

VUONO & GRAY, LLC

William A. Gray

as/140483

Enclosure

cc: Chief Administrative Law Judge Charles E. Rainey, Jr. (w/enc.)
Appalachian Movers, LLC (w/enc.)
Kennedy Transfer, Inc. (w/enc.)
Keystone Relocation, LLC (w/enc.)

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Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCKET NO. A-2014-2418497
APPALACHIAN MOVERS, LLC

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PETITION TO INTERVENE

Hoy Transfer, Inc. (Hoy), by its counsel, VUONO & GRAY, LLC, submit this Motion To Intervene pursuant to 52 Pa. Code §5.71 et seq. and requests that the Commission issue an order permitting Hoy to intervene in this proceeding. In support of the Motion, Hoy submits as follows:

1. This application was published in the Pennsylvania Bulletin on June 7, 2014. The publication notice indicated that protests to the application were due on June 23, 2014.
2. Hoy advised its counsel to file a Protest to this application and the Protest was prepared on June 11, 2014. A true and correct copy of the Protest prepared on June 11, 2014 is attached hereto as Appendix 1 and incorporated herein.
3. After a diligent search of its records, counsel for Hoy cannot verify that the Protest prepared on June 11, was actually filed with the Commission and it appears that the Protest was inadvertently not mailed to the Commission.

4. Believing, albeit incorrectly, that it had filed a Protest to the application, Hoy served Interrogatories on the Applicant and filed a Certificate of Service with the Commission verifying that the Interrogatories were served on June 13, 2014.

5. Hoy's counsel first became aware that the Commission may not have received the Protest filed on behalf of Hoy when he received an email on August 8, from Linda Salome, the Mediation Assistant, and also from Secretary Chiavetta acknowledging receipt of Certificate of Service of Interrogatories filed on behalf of Hoy but indicating that a Protest could not be located.

6. Hoy's counsel responded, after diligently checking his files, on August 8, indicating that he could not find proof that the Protest was actually mailed and that it may inadvertently not have been mailed.

7. If the Protest was not mailed to the Commission, it was because of an inadvertent oversight by the staff of Hoy's counsel.

8. Protests to this application have been filed by Kennedy Transfer, Inc. and Keystone Relocation, LLC.

9. A hearing has not yet been scheduled in connection with this application.

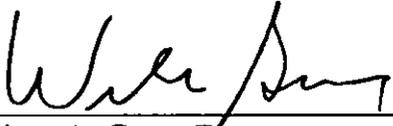
10. Because there are two other protestants in this case, there will not be any harm to the Applicant if Hoy is permitted to intervene and there will not be any delay in these proceedings as a result of its intervention.

11. Hoy's interest in this application is set forth in Appendix I.

WHEREFORE, Hoy respectfully requests the Commission enter an Order permitting Hoy to intervene in this proceeding and to participate to the same extent as if it had originally filed a protest to the application.

Respectfully submitted,

VUONO & GRAY, LLC

By: 
William A. Gray, Esq.
Attorney for
Hoy Transfer, Inc.

VUONO & GRAY, LLC
310 Grant Street, Suite 2310
Pittsburgh, PA 15219
(412) 471-1800

Dated: August 11, 2014

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Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCKET NO. A-2014-2418497

APPALACHIAN MOVERS, LLC

PROTEST AND REQUEST
FOR ORAL HEARING

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The motor carrier shown on Appendix A hereof (herein called protestant) protests the above application and requests that the application be assigned for oral hearing and in support thereof respectfully represents as follows:

1. By this application, notice of which has been published in the Pennsylvania Bulletin, applicant seeks authority as set forth in Appendix A.
2. Protestant holds authority from this Commission at the docket number shown in Appendix A and the relevant authority is attached to the protest. Unless otherwise indicated in Appendix A, protestant will withdraw the protest only in the event an amendment is made which will totally eliminate the interest of the protestant.
3. Approval of this application is neither necessary nor proper for the service, accommodation, safety or convenience of the public since (a) protestant presently holds authority to provide service in the area affected by the application, (b) protestant and other existing carriers are providing adequate service to the public in the areas involved in the application, (c) there is no need for the service proposed by applicant and approval of the application will result in the diversion from existing carriers of revenue necessary to sustain their existing operations, (d) the applicant does not possess the technical and

financial ability to provide the proposed service and lacks a propensity to operate safely and legally, and (e) approval of the application will adversely affect protestant and other existing carriers which have a substantial investment in facilities and equipment and are willing and able to provide service in the application area.

4. Protestant requests that the application be set for oral hearing and that applicant be required to prove by competent evidence the elements of proof required by statute. If an oral hearing is held, protestant will appear and present evidence in opposition to the grant of the application unless the application is amended so as to eliminate its interest as set forth in this protest.

WHEREFORE, protestant requests that the granting of the application be withheld; the proceeding be assigned for oral hearing with leave to protestant to participate fully therein; and applicant be required to make available at the hearing competent witnesses for examination on all material and relevant facts bearing on the application.

Respectfully submitted,

HOY TRANSFER, INC.

By: _____
William A. Gray, Esq.
Attorney for Protestant

VUONO & GRAY, LLC
310 Grant Street, Suite 2310
Pittsburgh, PA 15219-2383
(412) 471-1800

Dated: June 11, 2014

/137861

CERTIFICATE OF SERVICE

I hereby certify that I have this 11th day of June, 2014, served a copy of the above protest and request an oral hearing upon applicant or upon applicant's attorney or representative as shown in the Pennsylvania Bulletin notice.

William A. Gray

Re: Appalachian Movers, LLC
Docket No. A-2014-2418497

APPENDIX A

SCOPE OF AUTHORITY SOUGHT:

By application published in the Pennsylvania Bulletin on June 7, 2014, applicant seeks authority to operate as a common carrier, transporting:

Household goods in use between points in Centre County.

INTEREST OF PROTESTANT:

Hoy Transfer, Inc., 2580 Clyde Avenue, State College, PA 16801 (800-257-1110) holds operating authority at Docket No. A-00085095. A copy of the relevant authority of Hoy Transfer is attached hereto. As relevant to this application, Hoy can provide service between points in Centre County. There is no restrictive amendment that would result in the withdrawal of Hoy's protest.

Hoy Transfer, Inc.

SECTION 1
RULES AND REGULATIONS

ITEM 5 - SCOPE OF CARRIER'S OPERATING AUTHORITY

Rates and provisions named in this tariff, or as amended, are limited in their application on Pennsylvania intrastate traffic to the extent of the operating rights set forth below. Unless specifically provided, the provisions are to be interpreted in the same manner as the Pennsylvania Public Utility Commission interprets its Certificate from which the following is quoted.

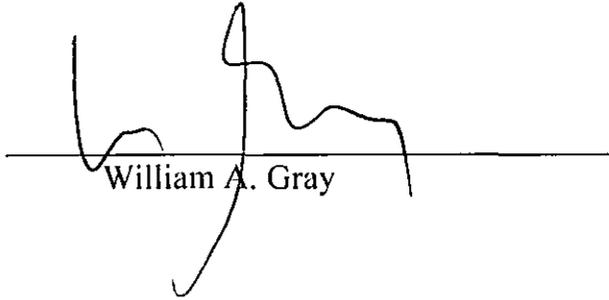
Certificate No. A-00085095 Folder 2, Am-A

- (1) To transport, as a Class D carrier, household goods, personal effects and property used or to be used in a dwelling when a part of the furnishings, equipment or supplies of such dwelling as an incidental part of a removal by the householder from one domicile to another; furniture, fixtures, equipment and the property of stores, offices, museums, institutions, hospitals or other establishments when a part of the stock, equipment or supply of such stores, offices, museums, institutions, hospitals or other establishments, when in connection with a removal from one location to another; articles, in use, including objects of art, displays and exhibits which, because of their unusual nature or value, require specialized handling and equipment usually employed in moving household goods; and tabulating machines, calculating machines, copying machines, computers, and other electronic equipment and business machines, which because of their unusual nature or value, require specialized handling and equipment usually employed in moving household goods, and parts, materials and supplies used in connection therewith, between points in the county of Centre, and from points in said county to points in Pennsylvania, and vice versa;
- (2) To transport, as a Class D carrier, household goods, personal effects and property used or to be used in a dwelling when a part of the furnishings, equipment or supplies of such dwelling as an incidental part of a removal by the householder from one domicile to another; furniture, fixtures, equipment and the property of stores, offices, museums, institutions, hospitals or other establishments when a part of the stock, equipment or supply of such stores, offices, museums, institutions, hospitals or other establishments, when in connection with a removal from one location to another; articles, in use, including objects of art, displays and exhibits which, because of their unusual nature or value, require specialized handling and equipment usually employed in moving household goods; and tabulating machines, calculating machines, copying machines, computers, and other electronic equipment and business machines, which because of their unusual nature or value, require specialized handling and equipment usually employed in moving household goods, and parts, materials and supplies used in connection therewith, for Avtex Fibers Lewistown, Inc., Lewistown Hospital, Geisinger Medical Group and the Central Pennsylvania Conference of the United Methodist Church, between points in the county of Mifflin, and from points in said county, to points in Pennsylvania, and vice versa.

Abbreviations and reference marks are explained on last page of tariff.

CERTIFICATE OF SERVICE

I hereby certify that I have this 11th day of August, 2014, served a copy of the foregoing Petition to Intervene upon parties of record in this proceeding.



William A. Gray

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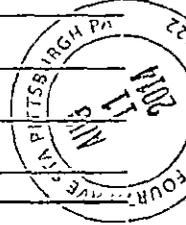
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From: Vuono & Gray, LLC

310 Grant Street, Suite 2310

Pittsburgh, PA 15219-2383



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To: Rosemary Chiavetta, Secretary

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P. O. Box 3265

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VUONO & GRAY, LLC

310 Grant Street, Suite 2310

Pittsburgh, PA 15219-2383

TO:

Ms. Rosemary Chiavetta

Secretary

Pennsylvania Public Utility Commission

P. O. Box 3265

Harrisburg, PA 17105-3265