

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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SECRETARY'S BUREAU

PENNSYLVANIA PUBLIC UTILITY  
COMMISSION BUREAU OF  
INVESTIGATION AND ENFORCEMENT

V.

DOCKET NO. C-2014-2452859

JAMES T & CHRISTIE A ST JOHN  
17 HEDGEWOOD AVENUE  
RONKS, PA 17572

ANSWER

AND NOW, comes James T. and Christie A. St. John (“Respondents”) by and through their attorney, Neal A. Rice, Esquire, and files this Answer in the above-captioned matter, and in support thereof states the following:

1. Admitted in part. Denied in part. It is admitted that all authority granted to Respondents by the Pennsylvania Public Utility Commission (“Commission”) are currently under suspension effective October 27, 2014. It is denied that the Respondents failed to maintain proper evidence of insurance with this Commission. Respondents notified the Commission that they had ceased doing business and requested that the Commission discontinue Respondent’s operating authority.

2. Admitted.

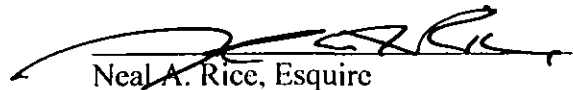
3. Admitted.

4. Denied. Respondents maintained Liability insurance through September 15, 2014. Respondents ceased to operate their business on August 27, 2014, and requested that the Commission terminate Respondent’s authority to operate under Certificate of Public Convenience number A-6414122.

5. Denied. Respondents deny the allegations in Paragraph 5 of the Complaint. Respondents maintained proper insurance while operating under PUC authority, and promptly requested the Commission to terminate Respondent's operating authority upon ceasing business operations.

**WHEREFORE**, for the foregoing reasons, Respondents deny that the Pennsylvania Public Utility Commission Bureau of Investigation and Enforcement is entitled to the relief requested and respectfully request that the Complaint be dismissed with prejudice, and that the Commission would promptly discontinue Respondents' Certificate of Public Convenience number A-6414122 since Respondent is no longer operating a business which requires PUC authority.

Respectfully submitted,




Neal A. Rice, Esquire  
Counsel for James T. & Christie A. St. John  
342 East Main Street, Suite 205  
Leola, PA 17540  
(717) 556-8158

DATED: December 4, 2014

VERIFICATION

I, Neal A. Rice, Attorney for James T. & Christie A. St. John, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect the Respondents will be able to prove the same at any hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities.



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Counsel for James T. & Christie A. St. John  
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document, James T. & Christie A. St. John's Answer to the Complaint, upon the persons and in the manner set forth below:

FIRST CLASS MAIL:

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

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

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DATED: December 4, 2014

# RICE LAW FIRM

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

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