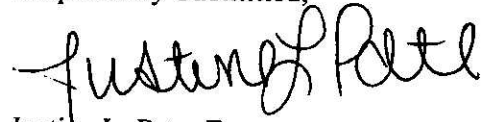


within the discretion of the agency. *Pennsylvania National Gas Association v. TW Phillips Gas and oil Co.*, 75 Pa. PUC 598, 603 (1991). Applicant points out that the Commission has specifically ruled, “on the question of standing to protest an application to obtain a certificate of public convenience...a protestant must have some operating authority in actual or potential conflict with the authority sought by an applicant to have the requisite standing to protest the application” *Application of Select Ambulance, Inc.*, No. A-2014-2441095 (Pa PUC Feb. 17, 2015) citing, *Application of Glen Alsace Water Company*, 45 Pa PUC 472 (1971)). When the Commission determined that taxi companies had standing to Protest Rasier-PA, LLC, another experimental service within the TNC classification the Commission reasoned, “The Protestants hold authority which provides transportation services similar to that which *may* [*emphasis added*] be provided by the Applicant, under the auspices of traditional call or demand, paratransit, or airport transfer authority. Therefore, the application presents at least a potential conflict with the Protestants authority.” *Interim Order Denying Preliminary Objections to the Protests of Various Call or Demand Carriers (United Cab, LLC; Good Cab, LLC; EZ Taxi, LLC; and Keystone Cab, Inc.)*, A-2014-242608, Dated August 11, 2014.

7. Applicant's reliance on *Application of Select Ambulance, Inc.*, is misguided. The distinguishable characteristic of *Select Ambulance* and the instant case is that *Select Ambulance* involved taxi companies protesting paratransit service, the immediate case involves taxi companies protesting experimental service. The Commission has already established precedent through *Rasier -PA, LLC* that traditional taxi service possesses the authority to protest Experimental Service.

WHEREFORE, Joint Protestant's Keystone Cab Service, Inc.; United Cab, LLC; Good Cab, LLC and EZ Taxi, LLC respectfully requests the Commission deny the Motion to Dismiss filed by Applicant East Coast Resources, LLC.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Justine L. Pate". The signature is written in a cursive, flowing style.

Justine L. Pate, Esq.
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Harrisburg, PA 17104
347-351-2631

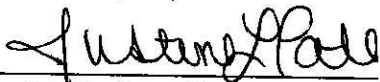
CERTIFICATE OF SERVICE

I, Justine L. Pate, Esq. do hereby certify that on this day I placed a true and correct copy of the foregoing document in the US Mail, postage prepaid addressed to the following persons:

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Justine L. Pate, Esq.