



THOMAS T. NIESEN
Direct Dial: 717.255.7641
tniesen@tntlawfirm.com

May 18, 2015

Via Electronic Filing

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

In re: Docket No. A-2015-2469125
Application of Granny's Helping Hands PA, Inc. t/a Let's Go Transportation, LLC

Dear Secretary Chiavetta:

We are counsel for Protestants Homestead Taxi, LLC and Homestead Transportation, LLC in the above matter and are submitting via electronic filing their Motion to Compel Responses to Interrogatories and Document Requests. A copy of the Motion is being served upon the Applicant and other participants as set forth on the certificate of service attached to it.

Very truly yours,

THOMAS, NIESEN & THOMAS, LLC

By 

Thomas T. Niesen

Enclosure

cc: Certificate of Service (w/encl.)
Nicholas Chermela (w/encl.)

150518-Chiavetta (Motion).wpd

**Before The
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**In re: Application of Granny's Helping : Docket No. A-2015-2469125
Hands PA, Inc. t/a Let's Go :
Transportation, LLC**

**MOTION OF HOMESTEAD TAXI, LLC AND
HOMESTEAD TRANSPORTATION, LLC TO COMPEL RESPONSES TO
INTERROGATORIES AND DOCUMENT REQUESTS**

AND NOW, comes Homestead Taxi, LLC and Homestead Transportation, LLC (“Protestants”), by their attorneys, and, pursuant to 52 Pa. Code §§ 5.342, 5.371 and 3.72, moves to compel responses to Protestants’ Interrogatories and Document Requests as follows:

1. This proceeding concerns the Application of Granny’s Helping Hands PA. t/a Let’s Go Transportation, LLC (“Applicant”) to provide call or demand service in Delaware, Montgomery, Chester and Bucks Counties.
2. Protestants filed a timely Protest to the Application on April 16, 2015.
3. On April 20, 2015, Protestants served Interrogatories and Document Requests on Applicant. A copy of the Interrogatories and Document Requests is attached as Exhibit A.
4. Applicant’s responses to the Interrogatories and Document Requests were due within 20 days of service or by May 10, 2015.
5. Applicant has failed to answer Protestants’ Interrogatories and Document Requests.

WHEREFORE, Protestants Homestead Taxi, LLC and Homestead Transportation, LLC request that the Public Utility Commission enter an order compelling Applicant to immediately answer Protestants' Interrogatories and Document Requests.

Respectfully submitted,



By: Thomas T. Niesen, Esquire
PA Attorney ID No. 31379
THOMAS, NIESEN & THOMAS, LLC
212 Locust Street, Suite 600
Harrisburg, PA 17108-9500

*Attorney for Protestants
Homestead Taxi, LLC and Homestead
Transportation, LLC*

DATE: May 18, 2015

INTERROGATORIES AND DOCUMENT REQUESTS



THOMAS, NIESEN & THOMAS, LLC

Attorneys and Counsellors at Law

THOMAS T. NIESEN
Direct Dial: 717.255.7641
tniesen@tntlawfirm.com

April 20, 2015

Eloise Jay-Jones, President
Granny's Helping Hands PA, Inc.
t/a Let's Go Transportation, LLC
P.O. Box 725
Lansdowne, PA 19050

In re: Docket No. A-2015-2469125
Application of Granny's Helping Hands PA, Inc. t/a Let's Go Transportation, LLC

Dear Ms. Jones:

We are counsel for Protestants Homestead Taxi, LLC and Homestead Transportation, LLC in the above matter, which is pending before the Pennsylvania Public Utility Commission. Enclosed are Interrogatories and Document Requests of Protestants addressed to you, as the Applicant. Please provide answers to the interrogatories along with the requested documents within 20 days of the date of this letter. The answers and documents should be sent to me at 212 Locust Street, Suite 600, Harrisburg, PA 17101. As requested in Interrogatory No. 19, please also provide me with copies of all responses that you provide to interrogatories of other Protestants.

Very truly yours,

THOMAS, NIESEN & THOMAS, LLC

By

Thomas T. Niesen

Enclosure

cc: Nicholas Chermela (via email, w/encl.)
Rosemary Chiavetta, Secretary (w/o encl.)

150420-GHH (Interrogatories).wpd

Before The
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Granny's Helping : Docket No. A-2015-2469125
Hands PA, Inc. t/a Let's Go :
Transportation, LLC

INTERROGATORIES AND DOCUMENT
REQUESTS OF PROTESTANTS HOMESTEAD TAXI, LLC AND
HOMESTEAD TRANSPORTATION, LLC ADDRESSED TO APPLICANT

TO: Granny's Helping Hands PA, Inc. t/a Let's Go Transportation, LLC

Pursuant to the provisions of Section 333(d) of the Public Utility Code (66 Pa. C.S. §333(d)), and the Public Utility Commission's Rules of Administrative Practice and Procedure, 52 Pa. Code §5.321, *et seq.*, Homestead Tax, LLC and Homestead Transportation, LLC, by their attorneys, submit the following interrogatories and document requests to the Applicant, and requests that the Applicant file and serve full and complete written answers to each interrogatory under oath and produce all documents requested herein, pursuant to the provisions of the Public Utility Code and the Commission's Rules of Administrative Practice and Procedure, which require answers 20 days after service of the Interrogatories.

Dated: April 20, 2015

INSTRUCTIONS

As used in these Interrogatories, the following terms are defined as follows:

(a) the term "Applicant" shall include, in addition to the named party, its attorneys, agents, servants, employees, representatives and others who are in possession of, or who have obtained evidence or information for, or on behalf of, the Applicant;

(b) the term "Person" shall include, without limitation, business and non-profit associations, corporations, proprietorships, joint ventures, departments, public agencies and board or bureaus including any predecessors in interest, subsidiaries or affiliates.

INTERROGATORIES AND DOCUMENT REQUESTS

1. Identify the owners of Applicant:
 - (a) By name, address and percentage of stock or interest held.
 - (b) By position of employment with Applicant.
 - (c) By position of employment with an employer other than Applicant.

2. Identify by name, duties, address and telephone number the administrative personnel of Applicant in respect to their daily operations.

3. Set forth the list of all taxicab vehicles the Applicant now owns or leases. Include the make, year, body style, license plate number, vehicle identification number and date purchased or leased.

4. Furnish copy of insurance policy on each vehicle.

5. Identify by name, address and telephone number all drivers.

6. Furnish copies of each driver's qualification file.

7. List all requests for service that will be offered in support of the Application, include:
 - (a) the date of each request;

 - (b) the name, address and phone number of the person or company requesting service;

 - (c) the nature of the service requested on each occasion, including the origin and destination of the requested transportation;

 - (d) the disposition of the request, that is, whether or not the applicant provided the service or, if not, whether the request was transferred to another carrier and, if there was a referral, to which carrier was the request referred.

8. What consequence, if any, will follow if the proposed service is not made available?

9. State the name, address and telephone number of each witness, including public need witnesses, Applicant expects to call at the hearing on this Application and a summary of the subject matter of their expected testimony.

10. Identify all persons who have been involved on behalf of Applicant in soliciting public witnesses to testify in support of this Application.

11. Describe in detail, and furnish copies, of all studies, analyses, projections and forecasts you have prepared or have prepared with respect to expected traffic, revenues and expenses to be generated in the future by your service should Application be granted.

12. State whether Applicant has been the subject of any Complaint to the Public Utility Commission, or to any other state or federal regulatory or governmental agency concerning the manner, quality or provision of any regulated service or activity conducted by Applicant. If so, describe in detail the identity of complainant, the date of the complaint, the substance of the complaint and the ultimate resolution of the complaint.

13. Furnish a copy of the Application and all attachments thereto as well as any other correspondence or documents filed with the Public Utility Commission or any members of its Staff.

14. Provide current financial data including a balance sheet and income statement and proforma financial data (including proforma balance sheet and proforma income statement) reflecting the grant of Authority sought.

15. Furnish copies of any management agreements, vehicle leases, subcontracting agreements and/or licensing agreements applicant has or has had with any other carriers.

16. Describe in detail Applicant's experience in the taxicab industry; including companies worked for, position held, starting and finishing dates of employment, vehicles driven, management functions, and job responsibilities.

17. Provide copies of all exhibits to be presented by Applicant at hearing in this matter.

18. Identify by street address, municipality and county all business locations of Applicant and describe what facilities Applicant has at each location.

19. Provide copies of all responses provided by Applicant to Interrogatories of other Protestants.

AS TO INTERROGATORIES
AND DOCUMENT REQUESTS

Thomas, Niesen & Thomas, LLC
212 Locust Street
Suite 600
Harrisburg, PA 17101

By



Thomas T. Niesen
PA Attorney ID No. 31379

AS TO ANSWERS AND
PRODUCTION OF DOCUMENTS

Granny's Helping Hands PA, Inc.
t/a Let's Go Transportation, LLC

By

**Before The
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In re: Application of Granny's Helping Hands PA, Inc. t/a Let's Go Transportation, LLC : Docket No. A-2015-2469125
Hands PA, Inc. t/a Let's Go : :
Transportation, LLC : :

CERTIFICATE OF SERVICE

I hereby certify that I have this 18th day of May, 2015 served a true and correct copy of the foregoing Motion to Compel Responses to Interrogatories and Document Requests, upon the persons and in the manner set forth below:

FIRST CLASS MAIL, POSTAGE PREPAID

Office of Administrative Law Judge
Pennsylvania Public Utility Commission
Post Office Box 3265
Harrisburg, PA 17105-3265

Granny's Helping Hands PA, Inc.
t/a Let's Go Transportation, LLC
P.O. Box 725
Lansdowne, PA 19050

Joseph Gabbay, Vice President/Manager
Germantown Cab Company
Rosemont Taxicab Company, Inc.
102 Browning Lane, Building B
Cherry Hill, NJ 08003

BY ELECTRONIC MAIL

Barnett Satinsky, Esquire
bsatinsky@foxrothschild.com

Ronald Winkelvoss, President
ronwink2@comcast.net

Eric Rayz, Esquire
erayz@kalraylaw.com

Heather C. Winett, Esquire
hcw@winettlaw.com



Thomas T. Niesen, PAID No. 31379