



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

July 13, 2015

**Via E-Filing**

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. Amedeo's Limousine Service, Inc.  
Docket No. C-2015-2484148  
**I&E Reply to New Matter**

Dear Secretary Chiavetta:

Enclosed for electronic filing is the Bureau of Investigation and Enforcement's Reply to the New Matter of Amedeo's Limousine Service, Inc. in the above-referenced proceeding. Copies have been served on the parties of record in accordance with the Certificate of Service.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "SMW", is positioned above the typed name.

Stephanie M. Wimer  
Prosecutor  
PA Attorney ID No. 207522

Enclosures

cc: As per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement,	:	
Complainant	:	
	:	
v.	:	C-2015-2484148
	:	
Amedeo's Limousine Service, Inc.	:	
Respondent	:	

**REPLY TO NEW MATTER**

NOW COMES, the Bureau of Investigation and Enforcement (I&E) of the Pennsylvania Public Utility Commission (Commission), Complainant in the above-docketed matter, by and through its prosecuting attorney, and replies to the New Matter of Amedeo's Limousine Service, Inc. (Respondent), pursuant to 52 Pa. Code § 5.63(a). In support thereof, I&E avers as follows:

6. Denied. While Respondent attached bills of sale as an exhibit to its Answer purporting to show that the vehicles referenced were sold, the bills of sale have not been admitted into record evidence and proof thereof is demanded at hearing.

7. Denied. I&E is without knowledge sufficient to form a belief as to the truth of the matter asserted and proof thereof is demanded. To the extent a response is required, this allegation is denied.

8. Admitted, in part, and denied, in part. It is admitted that Respondent did not renew its liability insurance. As to the remainder of the assertions of this Paragraph, I&E is without knowledge sufficient to form a belief as to the truth of the matters asserted

and proof thereof is demanded. To the extent a response is required, these allegations are denied.

9. Admitted, in part, and denied, in part. It is admitted that after Respondent's liability insurance was cancelled and by letter dated June 1, 2015, Respondent requested a voluntary suspension of its limousine authority under Docket No. A-00116120. As to the remainder of the assertions of this Paragraph, I&E is without knowledge sufficient to form a belief as to the truth of the matters asserted and proof thereof is demanded. To the extent a response is required, these allegations are denied.

**WHEREFORE**, for all the foregoing reasons, the Bureau of Investigation and Enforcement of the Pennsylvania Public Utility Commission respectfully requests that the Office of Administrative Law Judge and the Commission dismiss Respondent's New Matter and find Respondent to be in violation of the Public Utility Code and the Commission's regulations, as set forth in the Complaint.

Respectfully submitted,



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Stephanie M. Wimer  
Prosecutor  
PA Attorney ID No. 207522

Bureau of Investigation & Enforcement  
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P.O. Box 3265  
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[stwimer@pa.gov](mailto:stwimer@pa.gov)

Dated: July 13, 2015

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

Service by First Class Mail and Electronic Mail:

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Stephanie M. Wimer  
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Dated: July 13, 2015