



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

July 30, 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. Alfred Knight, Jr. t/a Knight Life Limousine Services
Docket No. C-2015-2449817
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 Alfred Knight, Jr. t/a Knight Life Limousine Services 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 "Step M. Wimer".

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-2015-2449817
	:	
Alfred Knight, Jr.	:	
t/a Knight Life Limousine Services,	:	
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 matter¹ of Alfred Knight, Jr. t/a Knight Life Limousine Services (Respondent), pursuant to 52 Pa. Code § 5.63(a). In support thereof, I&E avers as follows:

1. Admitted, in part.² Denied, in part. It is admitted that Motor Carrier Enforcement Officer David Gill (Officer Gill) called Respondent and inquired about transportation service. The remaining averments of this Paragraph are denied. It is specifically denied that Respondent offered to refer or arrange for transportation service that would be provided by a different company. To the contrary, Respondent offered

¹ Section 5.62(b) of the Commission’s regulations requires affirmative defenses to be pleaded under the heading of “New Matter.” 52 Pa. Code § 5.62(b). Contrary to the Commission’s regulations, Respondent raised affirmative defenses under the heading of “Affirmative Defenses.” I&E will treat the affirmative defenses as “new matter” and will reply accordingly.

² The affirmative defenses raised by Respondent were not set forth in numbered paragraphs, however, they were labeled as “first affirmative defense,” “second affirmative defense,” etc. I&E’s numbered paragraphs correspond to each affirmative defense identified by Respondent. For example, I&E’s response to Respondent’s First Affirmative Defense is set forth in Paragraph 1.

Officer Gill a fifteen-passenger bus that Respondent owns and operates at a rate of \$750 for three hours.

2. Denied. By way of further response, it is specifically denied that Respondent offered to refer or arrange for transportation service that would be provided by a different company. To the contrary, Respondent offered Officer Gill a fifteen-passenger bus that Respondent owns and operates at a rate of \$750 for three hours. The remaining averments in this Paragraph are denied and proof thereof is demanded.

3. Denied. It is specifically denied that Officer Gill presented false allegations, engaged in a personal vendetta against Respondent, slandered and/or defamed Respondent. It is also denied that the Commission has subject matter jurisdiction over the averments that are set forth by Respondent in this Paragraph.

4. Denied. It is specifically denied that the allegations made against Respondent were fabricated or that I&E's investigation of Respondent can be characterized as a "witch hunt." As to the remainder of Respondent's New Matter, I&E is without knowledge sufficient to form a belief as to the truth of the matters asserted and the same are therefore denied and proof thereof demanded.

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, as set forth in the Complaint.

Respectfully submitted,



Stephanie M. Wimer
Prosecutor
PA Attorney ID No. 207522

Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265
(717) 772-8839
stwimer@pa.gov

Dated: July 30, 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:

Mr. Alfred Knight, Jr.
t/a Knight Life Limousine Services
805 West 26th Street
Erie, PA 16508
djbutch@neo.rr.com



Stephanie M. Wimer
Prosecutor
PA Attorney ID No. 207522

Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
P.O. Box 3265
Harrisburg, PA 17105-3265
717.772.8839
stwimer@pa.gov

Dated: July 30, 2015