



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

IN REPLY PLEASE
REFER TO OUR FILE

January 5, 2017

Rosemary Chiavetta
Pa. Public Utility Commission
2nd Floor, 400 North Street
P.O. Box 3265
Harrisburg, PA 17105

Re: Pennsylvania Public Utility Commission Bureau of Investigation and Enforcement
v. Tengiz Kalandadze t/a Philadelphia Limo; Docket No. C-2015-2458845

Dear Secretary Chiavetta:

Enclosed for filing is the Motion for Consolidation of the Bureau of Investigation and Enforcement in the above-referenced proceeding.

Copies have been served on the parties of record in accordance with the Certificate of Service.

Very truly yours,

A handwritten signature in cursive script that reads "Heidi L. Wushinske".

Heidi L. Wushinske
Senior Prosecutor
PA Attorney ID No. 93792

Enclosures

cc: Deana Schlegel, Office of Administrative Law Judge

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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Pennsylvania Public Utility Commission, :
Bureau of Investigation and Enforcement, :
Complainant :
v. :
Tengiz Kalandadze t/a :
Philadelphia Limo, :
Respondent :

Docket No. C-2015-2458845

**MOTION FOR CONSOLIDATION
OF THE
BUREAU OF INVESTIGATION AND ENFORCEMENT**

TO THE HONORABLE ANGELA T. JONES:

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 attorneys, and pursuant to 52 Pa. Code § 5.102, hereby files this Motion for Consolidation of the Formal Complaints against Tengiz Kalandadze t/a/ Philadelphia Limo (Philadelphia Limo or Respondent) at Docket Nos. C-2015-2458845 and C-2016-2532820. In support thereof, I&E avers as follows:

1. On February 24, 2015, I&E filed a Formal Complaint against Philadelphia Limo at Docket No. C-2015-2458845 alleging, *inter alia*, that Philadelphia Limo permitted its vehicles to be operated while its insurance coverage had lapsed. The Complaint seeks civil penalties in the amount of \$5,000 and cancellation of Respondent's certificate of public convenience.
2. Philadelphia Limo filed an Answer to the Complaint on April 17, 2015.

3. A hearing in this matter was scheduled for December 21, 2016, in Philadelphia in front of Administrative Law Judge Angela T. Jones (ALJ Jones).

4. By letter dated December 1, 2016, sent by facsimile on December 6, 2016, Respondent wrote *inter alia* “[p]lease re schedule prehearing order.”

5. I&E filed an Answer on December 8, 2016, objecting to the continuance request on the basis of Respondent failing to provide good cause for a change in the scheduled hearing, as directed by the Prehearing Order dated November 1, 2016.

6. In Prehearing Order #4, ALJ Jones granted Respondent’s request and continued the hearing.

7. A new hearing was scheduled for January 31, 2017, before ALJ Jones in Philadelphia.

8. I&E also filed a Formal Complaint against Philadelphia Limo at Docket No. C-2016-2532820 on March 15, 2016, alleging that Philadelphia Limo failed to maintain evidence of insurance on file with the Commission. The Complaint seeks a civil penalty of \$500 and suspends Respondent’s certificate of public convenience.

9. Philadelphia Limo filed an Answer to this Complaint on April 1, 2016.

10. On September 2, 2016, the Commission received payment of \$170 towards the civil penalty requested in the Complaint at Docket No. C-2016-2532820.

11. No further payment or communication has been received regarding the Complaint at Docket No. C-2016-2532820.

12. On December 28, 2016, I&E reassigned the Complaint at Docket No. C-2016-2532820 to the Office of Administrative Law Judge for scheduling.

13. To date, the Complaint at Docket No. C-2016-2532820 has not been assigned to an Administrative Law Judge.

14. Because the Complaints at Docket Nos. C-2015-2458845 and C-2016-2532820 involve similar allegations, I&E requests that C-2016-2532820 be consolidated with C-2015-2458845 for purposes of the In Person Hearing scheduled for January 31, 2016.

15. I&E asserts that consolidation of C-2015-2458845 and C-2016-2532820 would conserve judicial and administrative resources.

16. In addition, consolidation would eliminate the need for the parties, including Respondent, to prepare for and travel to multiple hearings.

WHEREFORE, the Bureau of Investigation and Enforcement respectfully requests, that the Honorable Angela T. Jones issue an Order consolidating the Complaints at Docket Nos. C-2015-2458845 and C-2016-2532820 for purposes of the In Person Hearing, with the issues of both complaint matters to be addressed on January 31, 2017.

Respectfully submitted,



Heidi L. Wushinske
Senior Prosecutor
PA Attorney ID No. 93792

Michael L. Swindler
Deputy Chief Prosecutor
PA Attorney ID No. 43319

Pennsylvania Public Utility Commission
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Dated: January 5, 2017

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Pennsylvania Public Utility Commission, :
Bureau of Investigation and Enforcement :
v. : Docket No. C-2015-2458845
Tengiz Kalandadze t/a :
Philadelphia Limo :

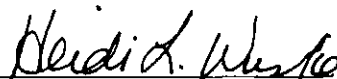
CERTIFICATE OF SERVICE

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:

Tengiz Kalandaze,
T/A Philadelphia Limo
839 Selmer Road
Philadelphia, PA 19116

The Honorable Angela T. Jones
Pennsylvania Public Utility Commission
801 Market Street
Philadelphia, PA 19107


Heidi L. Wushinske
Senior Prosecutor
PA Attorney ID No. 93972

Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
P.O. Box 3265
Harrisburg, PA 17105-3265
Phone: (717) 214-9594

Dated: January 5, 2017

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