

August 26, 2019

Via UPS Overnight and Electronic Mail

Honorable Benjamin J. Meyers
Administrative Law Judge
Pennsylvania Public Utility Commission
400 North Street, 2nd Floor West
Harrisburg, PA17120
benmyers@pa.gov

Re: Application of Washington Hose Company No. 1
Commission Docket No. A-2019-3009478

Dear Judge Meyers:

This letter is submitted in an effort to respond to the items set forth in your Prehearing Order of July 16, 2019 and in preparation for the August 29, 2019 hearing in this matter.

Settlement

On July 2, 2019, counsel for Applicant forwarded an offer of settlement in the form of a restrictive amendment to counsel for Protestant. On July 30, 2019, that offer was rejected. A counter offer has been made which was rejected. The parties continue settlement discussions.

Stipulation of facts

As part of its initial Application filing, Applicant completed and verified a Verified Statement containing factual information in support of the granting of its Application. While Applicant believes that the sworn statement, being part of the Application form contained on the Commission's web site to be filed simultaneously with the Application form itself automatically becomes part of the record in this proceeding, Applicant acknowledges that Protestant has the legal right to present evidence that challenges any sworn testimony and/or factual presentation. It is counsel's intention to introduce the Sworn Statement of Applicant as an exhibit in this proceeding.

Hon. Benjamin J. Meyers
Washington Hose Company No. 1
August 26, 2019
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Documents/Exhibits

Applicant intends to submit the Verified Statement of Applicant as an exhibit at the hearing of this matter. A copy of that document has been furnished to Protestant. Three copies of the documents are submitted to Your Honor with this letter in accordance with the instructions in Your Honor's Prehearing Order. Applicant reserves the right to submit additional exhibits at time of trial should the need arise.

Witnesses

At present, Applicant intends to call one witness – Mr. Scott Thorton, EMS Chief of Washington Hose Company No. 1. He will testify to the facts contained in his Verified Statement. As Protestant has not as of the date of this letter, submitted that names and area of testimony of its witnesses or exhibits they intend to introduce, Applicant reserves the right to call additional witnesses as needed.

Discovery

On July 31, 2019 Applicant propounded interrogatories to Protestant. No timely objections to those interrogatories have been filed. On August 20, 2019 Protestant submitted answers and objections to those interrogatories. There exists insufficient time to conduct follow-up interrogatories or file a Motion to Compel.

Thank you for your cooperation in this matter.

Respectfully,

REGER RIZZO & DARNALL LLP

/s/ Debra L. Roscioli

Debra L. Roscioli, Esquire

DLR:kg

cc: Rosemary Chiavetta (via efileing)
Charles Thomas III, Esq. (via efileing and USPS with enclosure)
Mr. Scott Thorton

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Washington Hose Company :
No.1 for Approval to Provide Paratransit :
Service in and around Chester County : A-2019-3009478
and Surrounding Counties for the Purpose :
of Transporting People from Hospitals, :
ACLF, Medical Offices, Skilled Nursing :
Facilities and Private Residences :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the Response to Honorable Benjamin J. Meyers Prehearing Order of July 16, 2019 on behalf of Washington Hose Company No. 1. upon the parties of record in this proceeding in accordance with the requirements of 52 Pa. Code §1.54 in the manner and upon the persons listed below:

Service by e-Filing and UPS Overnight

Benjamin J. Myers
Administrative Law Judge
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor West
Harrisburg, PA 17120
benmyers@pa.gov

Service by e-Filing and First Class Mail

Charles E. Thomas, III, Esq.
THOMAS, NIESEN & THOMAS, LLC
212 Locust Street, Suite 302
Harrisburg, PA 17101
cet3@tntlawfirm.com

Service by e-Filing

Ms. Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Filing Room
Harrisburg, PA 17120

Respectfully submitted,



Craig A. Doll, Esquire
Debra L. Roscioli, Esq.
REGER RIZZO & DARNALL LLP
700 East Gate Drive, Suite 101
Mt. Laurel, NJ 08054
CDoll76342@aol.com
droscioli@regerlaw.com

Attorney I.D. No. 22814 (C.Doll)
Attorney I.D. No. 91014 (D. Roscioli)

Dated: August 26, 2019

VERIFIED STATEMENT OF APPLICANT

THE FOLLOWING INFORMATION IS REQUIRED BY THE COMMISSION TO DETERMINE THE APPLICANT'S FITNESS TO OPERATE. STATEMENTS SHOULD BE TYPED OR PRINTED. ILLEGIBLE STATEMENTS WILL DELAY YOUR APPLICATION.

Washington Hose Company No.1

Legal Name of Applicant

Trade Name, if any

376 E Lincoln Hwy

Street Address (principal place of business)

Coatesville

City or Municipality

PA

State

19320

Zip Code

The Verified Statement of the Applicant factual details about your proposed transportation service. Your Verified Statement must answer all of the items listed below and on the following pages. Provide as much information as possible to prevent delay in processing your application. If you need more space to provide your answer, please attach additional pages identifying the appropriate item number.

1. Identify the person making the Verified Statement on behalf of the applicant. If an employee/officer of applicant is making the statement, give name, title, business address and telephone number.

Scott Thornton EMS Chief 376 E Lincoln Hwy Coatesville PA 19320 484-794-7277

2. List the applicant's affiliation (owner, manager, controls) with any other carrier, with the description of affiliation. N/A

3. Describe your facilities, record maintenance plan and your communication network. Please include a description of your physical location, to including office machines that will be utilized, and the facility to house vehicles. As a carrier of household goods in use, applicant should include a description of storage facilities, if applicable. Please include an explanation of your plan to maintain records required by the PUC, as well as normal business records. In regard to your communication network, please explain how you will receive customer requests for transportation, how you will dispatch the vehicles to fulfill the request, and how you will maintain continuous communication with your drivers.

We are a fire/ems station that can house various vehicles. We are expanding our current station to add a 2400 square foot pole barn for additional vehicle storage. Records will be maintained in the same manner as we follow today for DOH patient care reporting. Seven years and in a paperless environment. Requests for transports will be handled via cell phone calls and at times email. Dispatches will be communicated using the cell phone and at times our dispatching software. Our GeoTab software tracks and can communicate directly with each vehicle. In addition to our private portable radios.

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4. Please state the number of drivers you intend to use or hire in your business and explain why that number of drivers is appropriate for the size of the territory you will be serving. In addition, please explain:
- Your hiring standards for drivers;
 - Your system for conducting criminal background checks;
 - Your driver training program;
 - Your system for conducting driver license checks;
 - Your policies regarding alcohol and drug use by your drivers.

A = Must be 21 with three years prior driving experience
 B = Identigo, PA State Police, PA Child Abuse are all required
 C = All drivers go through our own in house training and sign off process.
 D = VFIS provides us with a 10 year and a 5 year MVR check.
 E = All Transport Drivers sign and acknowledge that random drug/alcohol testing is a requirement of employment or volunteering in this capacity. Zero tolerance automatic termination if positive testing result.

5. Please state the number of vehicles you plan to use in your business and why that number is appropriate to provide reasonable and efficient service to the territory you will be serving. If you have already obtained vehicles for your business, please list them in the chart below.

YEAR	MAKE	MODEL	SEATING CAPACITY*	VEHICLE ID #	MILEAGE
2008	Dodge	Grand Caravan	6	2D8HN44H38R791364	63353

*Vehicles with seating capacity of more than 15 passengers, including driver, can't be used in paratransit service.

6. Describe your vehicle safety program. Please include the following in your explanation:
- Your periodic vehicle maintenance plan
 - Your system for ensuring your vehicles will continuously comply with applicable Pennsylvania vehicle equipment standards (67 Pa. Code, Chapter 175).

We use an application called Fleetio for all of our service vehicles. This tracks all usage and vehicle safety checks along with mileage and timeframes to have each vehicle serviced or safety checks. Since each driver electronically submits a vehicle safety inspection this information is uploaded to our Fleetio database. If something is wrong a notification is sent to the officers of the company so they can fix or make an appointment for the vehicle to be sent to the service center for repairs or general servicing.

7. Please explain what steps you have taken to determine if you can obtain insurance and pay the required insurance premiums.

We have been paying our current VFIS insurance with no issues or concerns and already planned for the increase in adding this vehicle to our fleet insurance policy.

8. State whether the applicant has been convicted of a misdemeanor or felony. If applicant is partnership, limited liability partnership, corporation, or limited liability company this question applies to all members, officers, and/or shareholders. If "YES", explain.

YES NO

9. Financial Data. Complete the "Statement of Financial Position", which follows this page. Please feel free to also provide additional information explaining why you believe you have sufficient funds to ensure your transportation business can provide reliable service to the public in a safe manner.

The Washington Hose Company No.1 has been operating now for almost 150 years in the commonwealth of PA. Our services are priced as reasonable rates and our ability to invest and maintain revenue has increased over the last five years. We feel strongly that will be able to maintain this new service for the community for the long term.

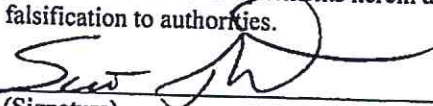
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Verification of Statement

The undersigned deposes and says that he/she is authorized to and does make this verification and that the facts set forth therein are true and correct to the best of his/her knowledge, information, and belief. The undersigned understands that false statements herein are made subject to penalties of 18 Pa. C. S. Section 4904 relating to unsworn falsification to authorities.



(Signature)

SCOTT Thacker EMS CHIEF

(Name and Title, printed or typed)

2/19/19

(Date)

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Statement of Financial Position (Balance Sheet)
As of (date) _____

ASSETS

Current Assets		
Cash		
Other Current Assets (specify)	_____	
Total Current Assets	_____	
Tangible Assets		_____
Motor Vehicle Equipment		
Property (buildings, land, etc.)	_____	
Office Equipment	_____	
	TOTAL ASSETS	_____

LIABILITIES

Current Liabilities (Due within one year of date)		
Loans		
Credit cards/revolving credit	_____	
Other Liabilities (Attach schedule)	_____	
Total Current Liabilities	_____	
Long Term Liabilities (Due after one year of date)		_____
Mortgage		
Long term commercial loan	_____	0
Other Liabilities (Attach Schedule)	_____	
Total Long Term Liabilities	_____	
	TOTAL LIABILITIES	_____

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Cash Basis

WASHINGTON HOSE COMPANY #1

Balance Sheet

As of February 14, 2019

	Feb 14, 19
ASSETS	
Current Assets	
Checking/Savings	
Citadel FCU (Store Checking)	390.39
Citadel FCU (Store Savings)	1,000.75
Citadel FCU Savings	5.00
CS Bank Ambulance Fund Checking	90,005.98
CS Bank Ambulance Fund MM Acct	74,824.20
GENERAL FUND CHECKING	221,701.36
PAYROLL CHECKING ACCOUNT	24,224.29
	<hr/>
Total Checking/Savings	412,151.97
	<hr/>
Total Current Assets	412,151.97
Fixed Assets	
08' Dodge Caravan	20,152.15
Accumulated Depreciation	-922,885.00
Building	
Ambulance Bay Doors	23,264.00
New Building Construction	160,418.00
Parking Lot Fixtures	1,100.00
Rear Corner	33,641.00
Security Camera	2,750.19
Sidewalk	4,765.00
Siding 94	6,932.00
Siding 95	2,600.00
Storm Windows	2,833.00
Trophy Case	3,000.00
Water Filtration System	1,150.00
Building - Other	154,793.54
	<hr/>
Total Building	397,246.73
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Improvements	2,132.19
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Machinery and Equipment	
ABD & Stryker Stretchers	15,590.00
Ambulance Equipment & Air Packs	96,633.00
Computer & Pagers	9,224.46
Emergency Med Bikes	8,316.00
EMS Computer	1,632.00
EMS Fire & Safety Equipment	27,140.87
EMS Misc Emergency Equip	13,627.29
EMS Personal Protective Equipme	14,086.00
EMSAR	1,198.00
Freezer	1,447.86
Furniture	4,481.17
Gas Heaters	5,933.00
Generator	39,100.00
Marco Equipment	20,000.00
Morning Pride Equipment	57,342.00
Phone System	13,654.00
Power Stretchers	50,008.00
Printer	900.98
Machinery and Equipment - Other	77,410.52
	<hr/>
Total Machinery and Equipment	457,725.15
	<hr/>
Vehicles	
'17 Explorer - EMS Chief	41,500.00
10 Ford E450 Sup Dut	1,746.49
17 Ford Explorer	45.77
17 Ford F-SD F450-550	94.47

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02/14/19
Cash Basis

WASHINGTON HOSE COMPANY #1
Balance Sheet
As of February 14, 2019

	Feb 14, 19
Amb 41-1	
2009 Ford E-450	138,673.46
2009 Ford E-450 Down Pay	20,000.00
Total Amb 41-1	158,673.46
Amb 41-3	
2006 Ford E450 Ambulance	24,026.92
Total Amb 41-3	24,026.92
Amb 41-4	
1996 Ford E 450 Ambulance Horto	15,000.00
Total Amb 41-4	15,000.00
Ambulance (2017)	199,374.95
Rear View B/U System	2,600.00
Squad 41 Vehicle	3,500.00
Ward Diesel Systems	51,444.00
Vehicles - Other	71,694.01
Total Vehicles	569,700.07
Total Fixed Assets	524,071.29
Other Assets	
City of Coatesville	
Laptop	4,026.41
Total City of Coatesville	4,026.41
Total Other Assets	4,026.41
TOTAL ASSETS	940,249.67
LIABILITIES & EQUITY	
Liabilities	
Current Liabilities	
Other Current Liabilities	
Citadel Loan -0030	
Citadel Credit Line - Principal	39,348.85
Total Citadel Loan -0030	39,348.85
Loan Payable - Stryker(Current)	5,386.20
LST Tax Payable	-82.00
PEMA Loan - Current	5,777.19
PEMA Loan - LT	81,609.72
Total Other Current Liabilities	132,039.96
Total Current Liabilities	132,039.96
Long Term Liabilities	
Loan Payable - Stryker - LT	7,630.35
Total Long Term Liabilities	7,630.35
Total Liabilities	139,670.31
Equity	
Open Bal Equity	374,205.31
Retained Earnings	403,662.11
Net Income	22,711.94
Total Equity	800,579.36
TOTAL LIABILITIES & EQUITY	940,249.67

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