



THOMAS, NIESEN & THOMAS, LLC

Attorneys and Counsellors at Law

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February 4, 2020

Via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Re: Docket No. A-2019-3014494
Application of Senior Care Centers of Pennsylvania, Inc.

Dear Secretary Chiavetta:

We are counsel for Protestant Rover Community Transportation, Inc. ("Rover") in the above matter and are submitting, via electronic filing with this letter, the Restrictive Amendment of Applicant Senior Care Centers of Pennsylvania, Inc., Joint Protestants Bucks County Transport, Inc., Bux-Mont Transportaticn, Inc., Easton Coach Company, Suburban Transit Network, Inc. and Tri County Transit Service, Inc. and Protestant Rover. A copy of the Restrictive Amendment is being served in accordance with the Certificate of Service attached to it. Please contact me if anything further is required concerning this matter.

Very truly yours,

THOMAS, NIESEN & THOMAS, LLC

By 

Thomas T. Niesen

Enclosure

cc: Certificate of Service (w/encl.)
The Honorable Darlene D. Heep (w/encl.)
Dale N. Krapf (via email, w/encl.)
Gary D. Krapf (via email, w/encl.)

**Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Senior Care Centers of Pennsylvania, Inc. : **Docket No. A-2019-3014494**
:

RESTRICTIVE AMENDMENT

AND NOW, come Applicant Senior Care Centers of Pennsylvania, Inc. ("Applicant"), Protestant Rover Community Transportation, Inc. ("Rover"), and Joint Protestants Bucks County Transport, Inc., Bux-Mont Transportation, Inc., Easton Coach Company, Suburban Transit Network, Inc. and Tri County Transit Service, Inc. ("Joint Protestants"), by and through their respective attorneys, and file this Restrictive Amendment in the above-captioned matter as follows:

1. The above-captioned Application is hereby amended to clearly identify and specify the territory requested so that the authority sought shall read as follows:

To provide a door-to-door, paratransit service to members of Senior Care Centers of Pennsylvania, Inc. ("SCCP") from their residences in Bucks, Chester, Delaware, Montgomery and Philadelphia Counties to SCCP's adult day health centers in the Counties of Bucks, Delaware, Montgomery and Philadelphia, and return.

2. Based upon the Restrictive Amendment set forth in Paragraph 1 above, and conditioned upon its acceptance and approval by the Pennsylvania Public Utility Commission ("Commission") and any order issued being consistent therewith, Rover and Joint Protestants agree to withdraw their Protests to the Application as amended. Rover and Joint Protestants desire to remain parties of record so as to receive copies of any orders or other documentation issued by the Commission in the proceeding.

3. The Restrictive Amendment set forth in Paragraph 1 is in the public interest because it will allow the Applicant to provide paratransit service in a manner consistent with its

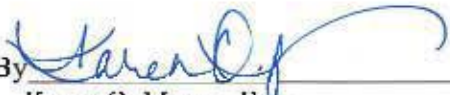
operating objectives, and it will resolve the Protests to the Application while avoiding the time and expense of further litigation.

4. If this Restrictive Amendment is not accepted or approved by the Commission for any reason, the parties agree that Rover's and Joint Protestants' respective Protests shall be deemed immediately reinstated and further hearings shall be held to permit Applicant to present evidence in an on-the-record proceeding in support of the Application and to permit Rover and Joint Protestants to present evidence in an on-the-record proceeding in opposition to approval of the Application.

WHEREFORE, the parties, in consideration of the promises mutually set forth above and intending to be legally bound, have executed this Restrictive Amendment as of this 4th day of February 2020.

SENIOR CARE CENTERS OF PENNSYLVANIA, INC.

ROVER COMMUNITY TRANSPORTATION, INC.

By 
Karen O. Moury, Esq.
ECKERT SEAMANS CHERIN, & MELLOTT, LLC
213 Market Street
8th Floor
Harrisburg, PA 17101

By _____
Thomas T. Niesen, Esq.
Charles E. Thomas, III, Esq.
THOMAS, NIESEN & THOMAS, LLC
212 Locust Street, Suite 302
Harrisburg, PA 17101

*Attorney for Applicant
Senior Care Centers of Pennsylvania, Inc.*

*Attorneys for Protestant
Rover Community Transportation, Inc.*

**BUCKS COUNTY TRANSPORT, INC.,
BUX-MONT TRANSPORTATION, INC.,
EASTON COACH COMPANY, SUBURBAN
TRANSIT NETWORK, INC. AND
TRI COUNTY TRANSIT SERVICE, INC.**

By _____
Tanya C. Leshko, Esq.
BUCHANAN INGERSOLL & ROONEY PC
409 North Second Street
Suite 500
Harrisburg, PA 17101-1357

*Attorney for Joint Protestants Bucks County
Transport, Inc., Bux-Mont Transportation,
Inc., Easton Coach Company, Suburban
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*Attorney for Applicant
Senior Care Centers of Pennsylvania, Inc.*

By  _____

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*Attorneys for Protestant
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PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Senior Care Centers of Pennsylvania, Inc. : Docket No. A-2019-3014494

CERTIFICATE OF SERVICE

I hereby certify that I have this 4th day of February, 2020, served a true and correct copy of the foregoing Restrictive Amendment, upon the persons listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant):

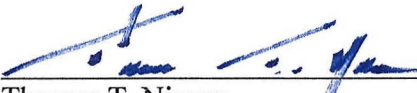
Via Electronic Mail and First Class Mail, Postage Prepaid

Karen O. Moury, Esq.
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Harrisburg, PA 17101

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Thomas T. Niesen.
PA Attorney ID No. 31379