

Before the  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY :  
COMMISSION, BUREAU OF :  
INVESTIGATION AND ENFORCEMENT :

V. : Docket No. C-2020-3020069

P & R HAULING, LLC :  
434 MCCONNELL RD. :  
CLARKSBURG, PA 15725 :

ANSWER TO COMPLAINT

AND NOW, Comes the Respondent, P & R Hauling, LLC, by and through its attorneys, Vuono & Gray, LLC, and files the following Answer to Complaint:

1. The averments of paragraph 1 are denied as conclusions of law to which no response is required. By way of further response, the PUC website shows Respondent's authority as "Active" and indicates an "Insurance Lapse Date" of May 18, 2020.

2. The averments of paragraph 2 are admitted.

3. The averments of paragraph 3 are admitted.

4. The averments of paragraph 4 are denied as conclusions of law to which no response is required. By way of further response, Respondent terminated the lease on its only truck on or about March 17, 2020 and has not operated under the Certificate of Public Convenience at A-2017-2635720 since such time. By way of further response, Respondent e-filed a Cancellation Request to cancel such Certificate today.

5. The averments of paragraph 5 are legal conclusions to which no response is required.

Respectfully submitted,

VUONO & GRAY, LLC

By: 

William H. Stewart III, Esq.

Attorney for

P & R Hauling, LLC

Respondent

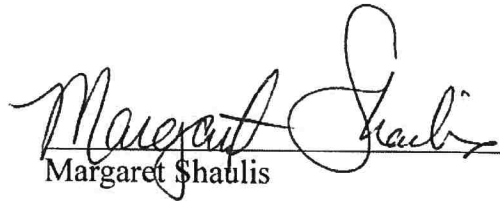
VUONO & GRAY, LLC  
310 Grant Street  
Suite 2310 Grant Building  
Pittsburgh, PA 15219  
(412) 471-1800

Dated: July 1, 2020

VERIFICATION

I verify that the statements made in the foregoing Answer to Complaint are true and correct to the best of my knowledge, information and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsification to authorities.

Date: July 1, 2020

  
Margaret Shaulis