



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
COMMONWEALTH KEYSTONE BUILDING  
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

July 22, 2021

**Via Electronic Filing**

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

Re: Pennsylvania Public Utility Commission,  
Bureau of Investigation and Enforcement v.  
Instant Courier, Inc.  
Docket No. C-2021-  
**Formal Complaint**

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Bureau of Investigation and Enforcement's Formal Complaint 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 black ink that reads 'Chris M. Andreoli'.

Christopher M. Andreoli  
Prosecutor  
PA Attorney ID No. 85676  
(717) 772-8582  
[chandreoli@pa.gov](mailto:chandreoli@pa.gov)

CMA/jfm  
Enclosures

cc: Per Certificate of Service

## NOTICE

**A. You must file an Answer within 20 days of the date of service of this Complaint.**

The date of service is the mailing date as indicated at the top of the Secretarial Letter. See 52 Pa. Code §1.56(a). The Answer must raise all factual and legal arguments that you wish to claim in your defense, include the docket number of this Complaint, and be verified. You may file your Answer by mailing an original to:

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, PA 17120

Or, you may eFile your Answer using the Commission's website at [www.puc.pa.gov](http://www.puc.pa.gov). The link to eFiling is located under the Filing & Resources tab on the homepage. If your Answer is 250 pages or less, you are not required to file a paper copy. If your Answer exceeds 250 pages, you must file a paper copy with the Secretary's Bureau.

Additionally, a copy should either be mailed to:

Christopher M. Andreoli, Prosecutor  
Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
400 North Street  
Harrisburg, PA 17210

Or, emailed to Mr. Andreoli at: [chandreoli@pa.gov](mailto:chandreoli@pa.gov)

B. If you fail to answer this Complaint within 20 days, the Bureau of Investigation and Enforcement will request that the Commission issue an Order imposing the requested relief.

C. You may elect not to contest this Complaint by paying the past due assessment and civil penalty within 20 days. Send only a certified check or money order made payable to the "Commonwealth of Pennsylvania," with the docket number indicated, and mail to:

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, PA 17120

D. If you file an Answer which either admits or fails to deny the allegations of the Complaint, the Bureau of Investigation and Enforcement will request the Commission to issue an Order imposing the requested relief set forth in this Complaint.

E. If you file an Answer which contests the Complaint, the matter will be assigned to an Administrative Law Judge for hearing and decision. The Judge is not bound by the penalty set forth in the Complaint and may impose additional and/or alternative penalties as appropriate.

F. If you are a corporation, you must be represented by legal counsel. 52 Pa. Code § 1.21.

G. Alternative formats of this material are available for persons with disabilities by contacting the Commission's ADA Coordinator at 717-787-8714.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement,	:	
Complainant	:	
	:	
v.	:	Docket No. C-2021-
	:	
Instant Courier, Inc.,	:	
Respondent	:	

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**FORMAL COMPLAINT**

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NOW COMES the Bureau of Investigation and Enforcement (“I&E”) of the Pennsylvania Public Utility Commission (“Commission”), by its prosecuting attorneys, and files this Complaint against Instant Courier, Inc. (“Respondent”), pursuant to Section 701 of the Public Utility Code, 66 Pa.C.S. § 701. In support of its Complaint, I&E respectfully represents the following:

**Parties and Jurisdiction**

1. The Pennsylvania Public Utility Commission, with a mailing address of 400 North Street, Harrisburg, PA 17120, is a duly constituted agency of the Commonwealth of Pennsylvania empowered to regulate public utilities within the Commonwealth pursuant to the Public Utility Code, 66 Pa.C.S. §§ 101, *et seq.*

2. Complainant is the Commission’s Bureau of Investigation and Enforcement and is the entity established by statute to prosecute complaints against public utilities

pursuant to 66 Pa.C.S. § 308.2(a)(11). *See also Implementation of Act 129 of 2008; Organization of Bureaus and Offices, Docket No. M-2008-2071852 (Order entered August 11, 2011) at 5 (transferring authority to prosecute assessment cases to I&E).*

3. Complainant is represented by:

Christopher M. Andreoli  
Prosecutor  
Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
400 North Street  
Harrisburg, PA 17120  
(717) 772-8582  
[chandreoli@pa.gov](mailto:chandreoli@pa.gov)

Kourtney L. Myers  
Prosecutor  
Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
400 North Street  
Harrisburg, PA 17120  
(717) 705-4366  
[komyers@pa.gov](mailto:komyers@pa.gov)

Michael L. Swindler  
Deputy Chief Prosecutor  
Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
400 North Street  
Harrisburg, PA 17120

4. Respondent is Instant Courier, Inc. and maintains its principal place of business at P.O. Box 331, Philadelphia, PA 19105, Attention: Bill Heeney.

5. Respondent is a “public utility” as that term is defined at 66 Pa.C.S. § 102, as it is engaged in transporting property in the Commonwealth of Pennsylvania for compensation.

6. The Commission issued Respondent a Certificate of Public Convenience on or about October 29, 2007 at A-00112342 for truck authority.

7. Section 501(a) of the Public Utility Code, 66 Pa.C.S. § 501(a), authorizes and obligates the Commission to execute and enforce the provisions of the Public Utility Code.

8. Section 701 of the Public Utility Code, 66 Pa.C.S. § 701, authorizes the Commission to, inter alia, hear and determine complaints against public utilities for a violation of any law or regulation that the Commission has jurisdiction to administer.

9. Section 3301 of the Public Utility Code, 66 Pa.C.S. § 3301, authorizes the Commission to impose civil penalties on any public utility, or any other person or corporation subject to the Commission's authority, for violation(s) of the Public Utility Code and/or Commission regulations. Section 3301(a)-(b) of the Public Utility Code, 66 Pa.C.S. § 3301(a)-(b), allows for the imposition of a separate civil penalty for each violation and each day's continuance of such violation(s).

10. Respondent, in transporting property as a common carrier for compensation, is subject to the power and authority of this Commission pursuant to Section 501(c) of the Public Utility Code, 66 Pa.C.S. § 501(c), which requires a public utility to comply with Commission regulations.

11. Pursuant to the provisions of the applicable Commonwealth statutes and regulations, the Commission has jurisdiction over the subject matter of this complaint and the actions of Respondent related thereto.

## **Factual Background**

12. On or about September 9, 2019, the Commission mailed to Respondent, by certified mail, an assessment invoice for the July 1, 2019 to June 30, 2020 Fiscal Year (“2019-2020 Fiscal Year”) that was based, in part, on revenues for the 2018 calendar year that Respondent reported to the Commission in its 2018 Assessment Report.

Respondent’s assessment was \$2,680. A copy of the assessment invoice is attached as Exhibit 1.

13. Accompanying the assessment invoice was a notice of assessment that informed Respondent that it was obligated to pay the amount listed on the assessment invoice within thirty (30) days or file objections within fifteen (15) days. A copy of the notice of assessment is attached as Exhibit 2.

14. On September 11, 2019, Respondent received the assessment invoice and notice of assessment for the 2019-2020 Fiscal Year. A true and correct copy of proof of delivery of the assessment invoice and notice of assessment is attached as Exhibit 3.

15. The Commission received no objections from Respondent to the assessment amount set forth in the 2019-2020 Fiscal Year Assessment Invoice.

16. On or about November 12, 2019, the Commission’s Bureau of Administration (“ADM”) sent Respondent a letter warning Respondent that if it did not pay its 2019-2020 Fiscal Year Assessment within 20 days of receipt of the letter, then the Commission would institute appropriate legal action against Respondent.

17. Respondent failed to pay the amount of the 2019-2020 Fiscal Year Assessment Invoice.

18. The total outstanding assessment balance for Respondent related to the 2019-2020 Fiscal Year is \$2,680.

### **Violation**

19. That Respondent failed to satisfy its 2019-2020 Fiscal Year Assessment in that it did not pay the amount due within thirty (30) days of receipt of the invoice. If proven, this is a violation of Section 510(c) of the Public Utility Code, 66 Pa.C.S. § 510(c). The Bureau of Investigation and Enforcement's proposed civil penalty for this violation is 15% of the outstanding assessment balance or \$402.<sup>1</sup> This civil penalty, consistent with past Commission decisions,<sup>2</sup> is based on Respondent's acceptable history of compliance with the Public Utility Code and Commission's regulations,<sup>3</sup> the amount of Respondent's outstanding assessment balance related to the 2019-2020 Fiscal Year, and the need to deter future violations of the Public Utility Code and the Commission's regulations pursuant to 52 Pa. Code § 69.1201.<sup>4</sup>

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<sup>1</sup> I&E anticipates that this level of penalty will provide a sufficient deterrent against future violations by Respondent.

<sup>2</sup> See *Pa. Pub. Util. Comm'n v. Juan Genet Enter., LLC t/a Safe Destinations*, Docket No. C-2014- 2450660 (Order entered August 3, 2017); *Pa. Pub. Util. Comm'n v. Leo Movers & Storage, Inc.*, Docket No. C-2015-2494528 (Order entered August 3, 2017); *Pa Pub. Util. Comm'n v. Hoffman Landscaping & Trucking, LLP*, Docket No. C-2015-2495061 (Order entered September 21, 2017); *Pa. Pub. Util. Comm'n v. Deer Haven, LLP*, Docket No. C-2015-2498095 (Order entered October 26, 2017); *Pa. Pub. Util. Comm'n v. Reach for the Stars Limousine Serv. Inc.*, Docket No. C-2015-2499276 (Order entered October 26, 2017).

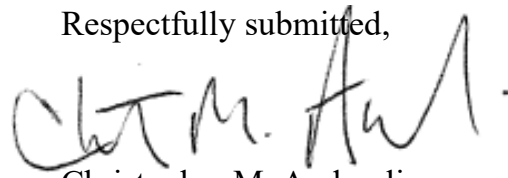
<sup>3</sup> A review of the Commission's records for a period of three (3) years prior to the date of the filing of this Complaint demonstrates that Respondent has an acceptable compliance history with the Commission.

<sup>4</sup> The Commission promulgated a Policy Statement at 52 Pa. Code § 69.1201 as a guideline that sets forth ten factors that are to be considered when evaluating whether and to what extent a civil penalty for violating a Commission order, regulation, or statute is warranted. Among these factors are the compliance history of the regulated entity that committed the violation, the amount of the civil penalty necessary to deter future violations, and past Commission decisions in similar situations. 52 Pa. Code §§ 69.1201(c)(6), (8), and (9).

**WHEREFORE**, for all the foregoing reasons, the Pennsylvania Public Utility Commission's Bureau of Investigation and Enforcement respectfully requests that:

- (a) Respondent be ordered to pay a total of \$3,082, which consists of its outstanding assessment balance of \$2,680 and a total civil penalty of \$402 for the above-described violation. Said payment should be made by certified check or money order, made payable to the "Commonwealth of Pennsylvania" with the docket number of this proceeding listed, and mailed to the Secretary's Bureau of the Commission; and
- (b) If payment of the assessment and civil penalty is not made, the Bureau of Investigation and Enforcement requests that:
  - (1) the Commission issue an Order to cancel the Certificate of Public Convenience issued to Respondent;
  - (2) this matter be referred to the Pennsylvania Office of Attorney General for appropriate action; and
  - (3) the Commission certify Respondent's automobile registrations to the Pennsylvania Department of Transportation for suspension or revocation.

Respectfully submitted,



Christopher M. Andreoli  
Prosecutor  
PA Attorney ID No. 85676

Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120  
(717) 772-8582  
[chandreoli@pa.gov](mailto:chandreoli@pa.gov)

Date: July 22, 2021

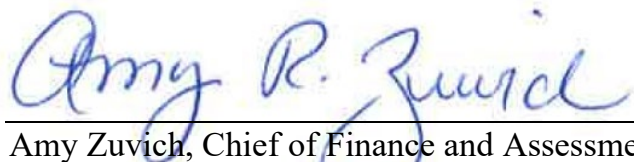
**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement,	:	
Complainant	:	
	:	
v.	:	Docket No. C-2021-
	:	
Instant Courier, Inc.,	:	
Respondent	:	

**VERIFICATION**

I, Amy Zuvich, Chief of Finance and Assessments, Bureau of Administration, Finance and Assessment Section, hereby state that the facts above set forth are true and correct to the best of my knowledge, information, and belief and that I expect the Bureau will be able to prove the same at any hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: July 22, 2021



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Amy Zuvich, Chief of Finance and Assessments  
Finance and Assessment Section  
Bureau of Administration  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, PA 17120

**I&E**  
**EXHIBIT 1**



Commonwealth of Pennsylvania  
**Pennsylvania Public Utility Commission**

Harrisburg, PA 17105-3265

**GENERAL ASSESSMENTS INVOICE**

Invoice Date	Invoice Number
9/9/2019	19-701495
Fiscal Year	
July 1, 2019 to June 30, 2020	

INSTANT COURIER INC  
BILL HEENEY  
1341 N DELAWARE AVE STE 206  
PHILADELPHIA PA 19125

- Read carefully Notice of Assessment
- Use return envelope provided
- Make check payable to:  
**Commonwealth of Pennsylvania**

PUC Assessment	\$2,680.00
<b>PAY THIS AMOUNT WITHIN 30 DAYS</b>	<b>\$2,680.00</b>

TO RECEIVE PROPER CREDIT FOR YOUR PAYMENT, REMOVE THE BOTTOM PART OF THIS INVOICE AT THE PERFORATION AND RETURN WITH YOUR REMITTANCE

**MAIL PAYMENT TO:**  
PA DOR  
PO BOX 61380  
HARRISBURG, PA 17106-1380

FOLD AND CUT HERE

RETURN THIS PORTION WITH YOUR REMITTANCE

INSTANT COURIER INC  
BILL HEENEY  
1341 N DELAWARE AVE STE 206  
PHILADELPHIA PA 19125

Invoice Date	Invoice Number
9/9/2019	19-701495
Fiscal Year	
July 1, 2019 to June 30, 2020	

<b>PAY THIS AMOUNT WITHIN 30 DAYS</b>	<b>\$2,680.00</b>
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19000070149561 090919100002680002000000000030000000000 000002680001

**I&E**  
**EXHIBIT 2**

**PENNSYLVANIA PUBLIC UTILITY COMMISSION  
Harrisburg, PA 17105-3265**

**NOTICE OF ASSESSMENT**

**EXPLANATION OF BILL FOR GENERAL ASSESSMENT  
FOR FISCAL YEAR JULY 1, 2019 TO JUNE 30, 2020**

In Section 510 of the Public Utility Code, 66 Pa. C.S. §510, the Pennsylvania General Assembly has authorized the Pennsylvania Public Utility Commission to assess all public utilities a percentage of their gross intrastate operating revenues for the preceding calendar year. Under Section 510, each public utility is required, on or before March 31 of each year to file with the Commission a statement of the utility's gross intrastate operating revenues for the preceding calendar year. After receiving the utilities' statements of gross intrastate operating revenues, the Commission sends general assessment invoices to all public utilities to advise each utility of the amount of assessment that utility owes based upon that utility's activity (gross intrastate operating revenues) in the preceding year. The enclosed assessment is for your proportionate share of the estimated expenses of the Public Utility Commission for the Commission's Fiscal Year July 1, 2019 to June 30, 2020.

**YOU ARE REQUIRED TO PAY THIS BILL WITHIN THIRTY DAYS AFTER YOU RECEIVE IT.** Objections to the assessment must be made in writing within 15 days and shall set out in detail the grounds upon which you regard the assessment to be excessive, erroneous, unlawful, or invalid. Objections may be filed only by the person, partnership, or corporation assessed. Filing an objection, however, does not eliminate your obligation to pay the assessment while your objection is being considered. **FAILURE TO PAY THE ASSESSMENT WHEN PAYMENT IS DUE WILL SUBJECT YOU TO PENALTIES.**

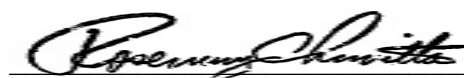
Be sure that your personal check or money order is written out in the same amount as your assessment invoice, and make your remittance payable to, "Commonwealth of PA". DO NOT SEND CASH. If you have reason to correspond with the Commission regarding your assessment invoice, please make reference to your invoice number. A receipt for payment will not be issued. Please mail your payment with the return portion of your invoice in the enclosed self-addressed envelope. Please note that rounding of your assessment to the nearest dollar has occurred. Your assessment for the PUC, including the OCA and the OSBA where applicable, has been combined into one invoice; one payment for all applicable assessments is acceptable. **A TWENTY DOLLAR (\$20.00) FEE WILL BE CHARGED FOR ALL DISHONORED OR BAD CHECKS REMITTED AS PAYMENT OF ASSESSMENTS.**

Your assessment has been computed by multiplying your gross intrastate operating revenues for the calendar year 2018 by the assessment factor for the public utility group of which you are a member. Your gross intrastate operating revenues for 2018 have been taken from the Assessment Reports Form GAO-18, AR-18-RR or AR-18-MC which you have filed with the Commission, or have been estimated by the Commission if you failed to file a timely report. Gross operating revenue reported to the Commission on the Assessment Reports may have been revised by the Commission to accurately reflect assessable revenue. The assessment factors for the various public utility groups are set forth in Schedule B enclosed herewith.

The approved estimate of expenditures of the Commission for the period July 1, 2019 to June 30, 2020 payable as a General Assessment by the public utilities which the Commission regulates has been determined as follows:

Approved budget for the Commission for the Fiscal Year July 1, 2019 through June 30, 2020:	\$73,611,286
Deduct:	
Pipeline Operators per Act 127 of 2011	436,712
Various Fees Collected in FY 2018-19	396,047
UGWF Administration per Act 13 of 2012	558,278
Prior Year cost saving	11,600,000
UCR Collection for CY 2018	4,945,527
EGS/NGS fees per Act 155 of 2014	<u>6,485,081</u>
<b>Total Deductions</b>	<b><u>\$24,421,645</u></b>
<b>General Assessment Total Amount</b>	<b>\$49,189,641</b>

The way in which the total Public Utility Commission assessment of \$49,189,641 has been allocated to the various groups of public utilities as shown on Schedules A and B enclosed herewith.



Rosemary Chiavetta  
Secretary  
PA Public Utility Commission

**MAKE INQUIRIES TO:**

Pennsylvania Public Utility Commission  
Bureau of Administrative Services/Assess  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**FOR CERTIFIED AND EXPRESS CARRIERS**

Pennsylvania Public Utility Commission  
Bureau of Administrative Services/Assess  
400 North Street  
Harrisburg, PA 17120

**CONTACT INFORMATION:**

Assessment Section Information - Telephone 717-265-7548

Allocation of Expenses based on percent of prior year Public Utility Group workload  
Budget Fiscal Year 2019-20

**SCHEDULE A**

<b>Group</b>	<b>Total Expenditures per Utility Group Calendar Year 2018</b>	<b>Percentage Distribution</b>	<b>Estimated Expenditures Fiscal Year 2019- 2020 by Utility Group</b>
Electric	\$23,436,049	44.9955%	\$22,133,125
Gas	\$10,504,657	20.1681%	\$9,920,616
Pipeline	\$673,178	1.2925%	\$635,776
Steam Heat	\$278,675	0.5350%	\$263,165
Tele./Tele.	\$5,153,184	9.8937%	\$4,866,676
Water/Sewer	\$6,109,664	11.7301%	\$5,769,994
Transportation - Passenger	\$2,707,337	5.1979%	\$2,556,828
Transportation - Property	\$1,017,406	1.9533%	\$960,821
Transportation - Rail	\$2,205,230	4.2339%	\$2,082,640
<b>Total</b>	<b>\$52,085,380</b>	<b>100.00%</b>	<b>\$49,189,641</b>

**SCHEDULE B**

<b>Group</b>	<b>Estimated Expenditures Fiscal Year 2019- 2020 by Utility Group</b>	<b>Gross intrastate revenues by utility group Calendar Year 2018</b>	<b>General Assessment Factor by Utility Group (Col. (a) / by Col. (b))</b>
	(a)	(b)	(c)
Electric	\$22,133,125	\$7,938,993,169	0.002787900749
Gas	\$9,920,616	\$3,751,930,993	0.002644136051
Pipeline	\$635,776	\$45,535,061	0.013962339921
Steam Heat	\$263,165	\$117,099,621	0.002247359964
Tele./Tele.	\$4,866,676	\$1,873,623,743	0.002597467084
Water/Sewer	\$5,769,994	\$1,371,787,252	0.004206187214
Transportation - Passenger	\$2,556,828	\$623,479,380	0.004100902262
Transportation - Property	\$960,821	\$587,608,875	0.001635136978
Transportation - Rail	\$2,082,640	\$137,646,211	0.015130383792
<b>Total</b>	<b>\$49,189,641</b>	<b>\$16,447,704,305</b>	<b>0.002990669098</b>

**SUPPLEMENTAL SCHEDULE  
FEDERAL SHORTFALL RELATED TO GAS SAFETY APPLICABLE TO GAS PUBLIC UTILITIES  
ONLY**

	<b>Estimated Commission Federal Shortfall for Calendar Year 2018 and 6 Months of Calendar Year 2019</b>	<b>Actual Commission Federal Shortfall for Calendar Year 2018 and 6 Months of Calendar Year 2019</b>	<b>Estimated Commission Federal Shortfall for Calendar Year 2019 and 6 Months of Calendar Year 2020</b>
Gas	\$0	\$0	\$0
	<b>Net Estimated Commission Federal Shortfall for Fiscal Year 2019-20 Assessment</b>	<b>Reported Revenue for Gas Utility Group for Calendar Year 2018</b>	<b>Supplemental add- on Factor</b>
Gas	\$0	\$3,751,930,993	0.000000000000

**I&E**  
**EXHIBIT 3**

Track Another Package +

Track Packages  
Anytime, Anywhere

Get the free Informed Delivery® feature to receive  
automated notifications on your packages

Learn More

(https://reg.usps.com/xsell?

app=UspsTools&ref=homepageBanner&appURL=https%3A%2F%2Finformeddelivery.usps.com/box/pages/intro/start.action)

Tracking Number: 9171969009350234164575

Remove X

Your item was delivered to an individual at the address at 1:54 pm on September 11, 2019 in PHILADELPHIA, PA 19125.

✓ Delivered, Left with Individual

September 11, 2019 at 1:54 pm  
PHILADELPHIA, PA 19125

Get Updates ▾

Text & Email Updates



Return Receipt Electronic



Tracking History



September 11, 2019, 1:54 pm

Delivered, Left with Individual  
PHILADELPHIA, PA 19125

Your item was delivered to an individual at the address at 1:54 pm on September 11, 2019 in PHILADELPHIA, PA 19125.

September 11, 2019

In Transit to Next Facility

September 10, 2019, 10:09 am

Arrived at USPS Regional Facility

PHILADELPHIA PA DISTRIBUTION CENTER

September 9, 2019, 9:04 pm

Arrived at USPS Regional Facility

HARRISBURG PA DISTRIBUTION CENTER

September 9, 2019, 7:49 pm

Accepted at USPS Origin Facility

HARRISBURG, PA 17120

September 9, 2019

Pre-Shipment Info Sent to USPS, USPS Awaiting Item

Product Information



See Less ^

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

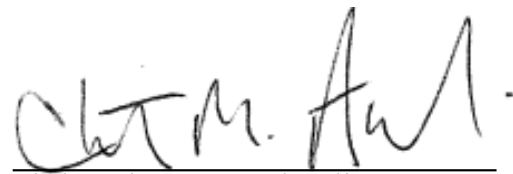
Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement,	:	
Complainant	:	
	:	
v.	:	Docket No. C-2021-
	:	
Instant Courier, Inc.,	:	
Respondent	:	

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing **Formal Complaint** in the manner and upon the parties listed below, in accordance with the requirements of 52 Pa. Code §§ 1.54 (relating to service by a party).

**Served via Electronic Mail**

Instant Courier, Inc.  
Attn: Bill Heeney  
1341 N. Delaware Avenue, Suite 206  
Philadelphia, PA 19125  
Telephone: 215-425-7202



\_\_\_\_\_  
Christopher M. Andreoli  
Prosecutor  
PA Attorney ID No. 85676

Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120  
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Date: July 22, 2021