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March 25, 2022

**VIA ELECTRONIC FILING**

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

RE: Application of Exceptional Movers LLC for Carrier of Household Goods in Use Authority; Docket No. A-2021-3029208; **EXCEPTIONAL MOVERS LLC'S PETITION FOR RECONSIDERATION OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION'S MARCH 10, 2022 ORDER**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is Exceptional Movers LLC's Petition for Reconsideration of the Pennsylvania Public Utility Commission's March 10, 2022 Order in the above-captioned docket.

Thank you for your attention to this matter. If you have any questions related to this filing, please do not hesitate to contact my office.

Very truly yours,

Todd S. Stewart  
Bryce R. Beard  
*Counsel for Exceptional Movers LLC*

BRB/jld

Enclosure

cc: Office of Special Assistants (via email - [ra-OSA@pa.gov](mailto:ra-OSA@pa.gov))

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Exceptional Movers LLC for :  
Carrier of Household Goods in Use : Docket No. A-2021-3029208  
Authority :

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**EXCEPTIONAL MOVERS LLC'S  
PETITION FOR RECONSIDERATION  
OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION'S  
MARCH 10, 2022 ORDER**

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*Counsel for Exceptional Movers LLC*

DATED: March 25, 2022

AND NOW, comes the Applicant Exceptional Movers LLC (“Exceptional Movers”) and hereby Petitions the Pennsylvania Public Utility Commission for reconsideration of its March 10, 2022, Opinion and Order (“Order”) in the above-captioned Complaint matter pursuant to 66 Pa. C.S. § 703(f) and 52 Pa. Code § 5.572.

The basis of the Petition for Reconsideration is that the Commission should exercise its discretion and rescind its order in whole and grant the Application as the Order denying the *pro se* Applicant’s Petition for Reconsideration of Staff Action erroneously found that Applicant obtained his experience from operating an *unlicensed household’s good carrier*, where the verified statements of Applicant show Applicant was not *transporting* any property by motor vehicle at any time for compensation. Order at 10. This new and novel argument not raised previously supports granting the application where the verified statements of the applicant, responses to BTUS discovery, and the Commission’s summary thereof<sup>1</sup> shows that at no time did Applicant “undertake the *transportation* of ... property... between points within this Commonwealth” or “hold itself out to *provide or furnish transportation* of household property between residential dwellings within the Commonwealth.” 66 Pa. C.S. 102 (emphasis added). As discussed below, Exceptional Movers, to date, has only provided *moving labor services* either directly to clients or through U-haul and Elite *moving help* portals – these services did not include the *transportation of property* by motor vehicle between points in the Commonwealth, and Exceptional Movers only provided loading and unloading, special packaging, and disassembling and reassembling services at each side of the move for clients. There is no evidence of any illegal or unlicensed transportation operations by Exceptional Movers, and the Commission should therefore rescind its Order and grant the Application.

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<sup>1</sup> Order at 9.

Additionally, the Commission should rescind its Order finding that Exceptional Movers' 7 years of moving labor experience does not meet the "equivalent" experience requirement under 52 Pa. Code § 3.381(c)(1)(iii)(A)(II)(-1-). As Applicant's detailed and thorough explanation of his experience provides, the only aspect of a Motor Carrier of Household Goods in Use that Exceptional Movers did not undertake was the *transportation* of the goods by motor vehicles, the operation of which is limited to one's ability to drive, maintain, and operate a vehicle. However, Mr. Toney's verified statement detailed his 20 years of trucking experience and a clean driving record – indicating fitness to safely operate a moving truck. All other aspects of Exceptional Movers' 7 years of moving labor experience directly to clients or through U-haul/Elite labor portals including loading, unloading, special packing, care taken in maneuvering in households, disassembling and reassembling specialized equipment, and generally assisting customers with the loading/unloading of their rental trucks, Pods, U-boxes, or personal vehicles show that Exceptional Movers meets the "equivalent" experience requirement and has proven its technical fitness to begin operations as a motor carrier.

Finally, as a matter of public policy and the Commission's initiative to eliminate barriers to competition in the motor carrier of household goods industry, the Commission should find that Applicant's extensive 7 years of experience in the moving labor industry with 20 years of trucking experience under 52 Pa. Code § 3.381(c)(1)(iii)(A)(II)(-1-) is "equivalent experience" that is distinguishable from all prior cases cited in the Commission's Opinion and Order, thus warranting approval of the application under the unique circumstances.

In support of this Petition for Reconsideration, the Exceptional Movers states as follows:

## **I. PROCEDURAL HISTORY**

1. On October 20, 2021, Exceptional Movers LLC, a moving labor service provider registered and operating since 2014 at PA Entity No. 4257024, filed an Application requesting a Certificate of Public Convenience to operate as a Commercial Carrier of Household Good in Use. The Application contained the necessary information and verified statement of Exceptional Movers LLC's owner Matthew Toney, describing the factual details of the proposed transportation service and Exceptional Movers LLC's technical and financial fitness to operate safely and in compliance with the Commission's regulations.

2. On October 25, 2021, the Bureau of Technical Utility Service (BTUS) propounded a request for information seeking evidence that Applicant "has a minimum of two-years' experience working with a licensed household goods carrier, in addition to the time working as a loader/unloader."

3. Also on October 25, 2021, Exceptional Movers provided the response to the BTUS discovery, including a detailed explanation of documented work experience, examples of invoices dating back to 2014, proof commercial general liability insurances, and evidence of Exceptional Movers work as a laborer with Moves for Seniors all related to Exceptional Movers moving labor services.

4. On November 24, 2021, the Commission issued a secretarial letter denying and dismissing the Application on the basis of "falsification to demonstrate the required fitness" pursuant to 52 Pa. Code § 3.381(c)(1)(iii)(A)(II)(-1-).

5. On December 12, 2021, Exceptional Movers filed a *pro se* Petition for Reconsideration of Staff Action. The Petition argued that the Applicant met the requirements of 52 Pa. Code § 3.381 though the extensive knowledge, skills, and over 7-years' experience

demonstrating the necessary qualifications and possession of “equivalent” experience in compliance with the Commission’s regulations.

6. On March 10, 2022, the Commission entered the above-referenced Opinion and Order denying the *pro se* Petition for Reconsideration of Staff Action and dismissing the Application based on the interpretation of Exceptional Movers’ data responses that Mr. Toney gained his experience from operating an *unlicensed* household goods in use carrier.

7. Undersigned counsel for Exceptional Movers entered their Notice of Appearance simultaneously with the filing of this Petition for Reconsideration on March 25, 2022.

## **II. LEGAL STANDARDS FOR RECONSIDERATION**

8. The Commission’s standard for reviewing petitions for reconsideration following final orders is set forth in *Duick v. Pennsylvania Gas and Water Co.*, Docket No. C-R0597001 *et al.*, 56 Pa. P.U.C. 553, 559, (1982). The Commission’s recently summarized the standard for reconsideration stating:

The standards for granting a Petition for Reconsideration were set forth in *Duick v. Pennsylvania Gas and Water Co.*, Docket No. C-R0597001 *et al.*, 56 Pa. P.U.C. 553, 559, (1982). Under the standards set forth in *Duick*, a Petition for Reconsideration may properly raise any matter designed to convince this Commission that we should exercise our discretion to amend or rescind a prior Order, in whole or in part. Such petitions are likely to succeed only when they raise “new and novel arguments” not previously heard or considerations that appear to have been overlooked or not addressed by the Commission. *Duick* at 559. It has also been held that, because a grant of relief on such petitions may result in the disturbance of final orders, it should be granted judiciously and only under appropriate circumstances. *West Penn Power v. Pennsylvania Public Utility Commission*, 659 A.2d 1055 (Pa. Cmwlth. 1995), petition for allowance of appeal denied, No. 576 W.D., Allocatur Docket (April 9, 1996); *City of Pittsburgh v. PennDOT*, 490 Pa. 264, 416 A.2d 461 (1980).

*Pa. PUC, et al. v. Columbia Gas of Pennsylvania, Inc.*, Docket No. R-2018-2647577 (Opinion and Order entered January 17, 2019, slip op. at 7-8)

9. The necessary components of any petition for reconsideration are that the requesting party must raise “new or novel arguments” not previously heard or considerations that appear to have been overlooked or not addressed by the Commission. In this case, Applicant avers that the Commission has overlooked and misunderstood Exceptional Movers prior operations and experience as a moving labor business, and incorrectly found and denied the Application on the basis that Applicant was operating as an unlicensed household goods in use carrier over a seven-year period.

### III. ARGUMENT

**A. Applicant’s moving labor business did not undertake the unlicensed or illegal transportation of property by motor vehicle between points in the Commonwealth, and the Commission misinterpreted the nature of Applicant’s moving labor business and services provided on U-Haul and Elite’s moving help portals.**

10. As the foundational basis for denying the Application, the Commission, upon review of the Application and responses to BTUS’s data requests, determined that “all of the experience gained by Mr. Toney was obtained from operating an *unlicensed* household goods in use carrier over a seven-year period.” Order at 10 (emphasis original). The remainder of the Order discussed how illegal *motor carrier* operations cannot satisfy the two-year minimum experience requirement as the requirement goes to whether the applicant possesses the requisite technical and financial fitness needed to be granted a Certificate of Public Convenience. Order at 10-11. The Order goes on to discuss that while an applicant’s work history and equivalent experience may be considered on a case-by-case basis to support an applicant’s fitness, Exceptional Movers’ Application and *unlicensed* experience was not persuasive to show technical fitness on the basis

that the experience was from unlicensed operations. Order at 11. These points, however, are all based on the erroneous view of the record and verified statements that Applicant’s current business undertook the *transportation* of household goods, which it did not.

11. The Public Utility Code at 66 Pa. C.S. § 102 defines “Common Carrier by Motor Vehicle” to include:

1) Any common carrier **who or which holds out or undertakes the transportation of passengers or property, or both, or any class of passengers or property, between points within this Commonwealth by motor vehicle for compensation**, whether or not the owner or operator of such motor vehicle, or who or which provides or furnishes any motor vehicle, with or without driver, for transportation or for use in transportation of persons or property as aforesaid.

(2) The term includes:

....

(ii) A person that holds itself out **to provide or furnish transportation of household property between residential dwellings within this Commonwealth by motor vehicle for compensation**, owns or operates the motor vehicle and provides or furnishes a driver of the motor vehicle with the transportation.

66 Pa. C.S. § 102 (emphasis added).

12. Exceptional Movers’ Application, data responses, and *pro se* Petition for Reconsideration of Staff Action, on their plain reading, do not support the Commission’s finding that Exceptional Movers’ business illegally “provided or furnished *transportation* of household property between residential dwellings.” 66 Pa. C.S. § 102. As discussed in these documents, and as summarized in the Order at page 9, Exceptional Movers’ prior business and experience in the moving industry involved **only** the provision of moving labor services – not the *transportation* of household property. In pertinent part, these verified documents provided:

Application – October 20, 2021

At Page 5 (emphasis added) – “Exception Movers LLC DOT # 3527313 has been in service since 2014 **as a moving labor service with providing loading and unloading help.** Applicant has over 7-years moving experience.” Providing labor for loading and unloading help is not the “transportation of household property between residential dwellings.”

At Page 6 – “Applicant is currently the only driver **with 20-years trucking experience and clean driving record.**”

Responses to BTUS Data Request – October 25, 2021

At Page 5, letter response – does not support finding that Applicant was providing unlicensed *transportation* service.

At Page 6, the May 2, 2014 example invoice – Note this invoice is for “moving labor” with Bethany Village which does not indicate any *transportation services* were provided.

At Page 7-10, Certificate of Liability Insurances – Exceptional Movers provided evidence of “Commercial General Liability” insurance in 2017, 2018, 2020, and 2021.

Applicant’s *pro se* petition for reconsideration of staff action – December 12, 2021

Page 1-2, paragraph 1 – provided detailed experience of loading, unloading, tying down, safely moving belongings to specific locations in homes, special box packing, stretch wrapping, disassembly, assembly. Additionally, and importantly, Mr. Toney stated “I have trained and guided crews in assisting customers with loading and unloading of ***their rental trucks, Pods, U-boxes, or personal vehicles.***” None of this indicates that *transportation services* were provided.

Page 2, paragraph 2 – describes Mr. Toney’s 5-star rating and work through U-Haul and Elite moving help portals, stating “I advertise *my moving labor services and skills* for the past 7 years with over six hundred moves completed.”

13. Additionally, while not submitted to the record, through this Petition Applicant requests consideration of its current advertised services found at [www.excmovers.com](http://www.excmovers.com), which explicitly states as “services we provide” including “loading and unloading,” “wrapping and packing,” and “disassemble[sic] & reassemble.” Exceptional Movers does not advertise nor offer the transportation of household goods in use and functions entirely as a *moving labor service* assisting clients who rent or obtain their own moving vehicles. A signed verification of Applicant is attached to attesting to these facts. See **Attachment A**.

14. The Commission should reconsider its finding that Mr. Toney operated an unlicensed household goods in use carrier, as the verified statements and record do not support the conclusion that Applicant ever illegally “provide or furnish *transportation* of household property between residential dwellings.” 66 Pa. C.S. § 102.

**B. As Mr. Toney’s experience was not from “operating an *unlicensed* household goods in use carrier,” the Commission overlooked Applicant’s extensive 7-years’ experience in the moving industry and 20-years of trucking experience, and it is appropriate for the Commission to find this experience satisfies the “equivalent” requirement under 52 Pa. Code § 3.381(c)(1)(iii)(A)(II)(-I-) under the circumstances.**

15. Because the record shows that Mr. Toney’s moving labor service did not “provide or furnish *transportation* of household property between residential dwellings,” the commission’s prior holdings that experience through illegal, unlicensed motor carrier operations do not apply, and the Commission should consider Applicant’s 7-year work history and 20 years of trucking experience with a clean driving record – facts that establish his technical fitness to be granted a Certificate of Public Convenience to operate as a Motor Carrier of Household Goods. Indeed,

these facts with the remainder of the Application, show that Exceptional Movers has met its burden of proving its technical and financial fitness to operate safely and in compliance with the Commission's regulations under the meets the requirements of the evidentiary criteria stated in 52 Pa. Code § 41.14.

16. In the Order, the Commission relied on *Application of Lytle Property LLC*, Docket no. A-2019-3009244 (Order Entered January 3, 2020) (“*Lytle*”) and *Re: Petition of Baker’s Moving LLC for Waiver of 52 Pa. Code § 3.381(c)(1)(iii)(A)(II)(-l-)*, Docket No. P-2018-3000219 (Order entered May 3, 2018) (“*Baker*”). Both of these decisions are distinguishable from the instant matter, and warrant the Commission exercise its discretion here on a case-by-case basis.

17. In *Lytle*, the applicant had been operating an unlicensed household goods in use carrier for 7 years prior to being caught by the PUC for its illegal operations. *Lytle* at 2. BTUS denied the application for failure to provide evidence of two-years’ minimum experience with a licensed household goods carrier, or the equivalent, as required. *Lytle* at 3. In denying reconsideration of the dismissal of the application, the Commission explicitly stated it cannot permit an applicant “to use its *previous illegal operations* as the basis to satisfy the two-year experience requirement” as this factor goes to the technical fitness of the applicant. *Lytle* at 8-9. The Commission further held that *Lytle*’s work history as an unlicensed operator is not persuasive. *Lytle* at 9. Here, unlike *Lytle*, Exceptional Movers has not provided *unlicensed transportation service*. Rather, the evidence shows that Mr. Toney’s 7-years’ experience as a moving labor service never violated the Public Utility Code or the Commission’s regulations and thus should be considered as equivalent on this case-by-case basis.

18. Next, the Commission relies on *Baker* for the premise that unlicensed operations cannot meet the Commission’s 2-year requirement or the equivalent. In *Baker*, the Petitioner

sought waiver of the Commission’s regulations at 52 Pa. Code § 3.381(c)(1)(iii)(A)(II)(-1-) of the two-years’ experience with a licensed household goods carrier or the equivalent. *Baker* admitted he did not have the 2-years’ experience or equivalent per the regulations, but alleged that he had experience driving delivery trucks and helping family and friends move. *Baker* at 2. Based on this alone, *Baker* sought waiver of the Commission’s 2-year requirement. *Id.* The Commission found that granting the Petition for Waiver was not appropriate, as doing so would effectively prejudice Baker’s fitness to provide service, and hinder a protestant’s ability to challenge Baker’s subsequent application. *Id.* at 3. The Commission went on to state that a filing an application would give Baker the opportunity to argue waiver is justified based on his work history. *Id.* *Baker* is not applicable to Exceptional Movers’ Application – Exceptional Movers is not seeking waiver of the Commission’s regulations, and rather has presented the 7-year experience and work history of Mr. Toney in moving labor services and 20-years trucking experience which, in the context of an application, should be considered as “equivalent” experience showing Applicant’s technical and financial fitness to operate.

19. Additionally, the Commission cites *Application of 610 Hauling, LLC t/a College Hunks Hauling Junk, for the right to begin to transport, as a common carrier, by motor vehicle, household goods in use, from points in the counties of Chester, Delaware, Montgomery, Philadelphia, and Bucks, to points in Pennsylvania*, Docket No. A-2012-2334103 (Order entered Nov. 5, 2015) (“*610 Hauling*”). In *610 Hauling*, which was complicated by the Commission’s amendment to its regulations and other matters, the Commission found that while the applicant failed to expressly provide a statement on 2-years’ experience with a licensed carrier or the equivalent, the applicant did submit, in other documentation at the docket, evidence of “that the

applicant has a minimum 2-years' experience in moving items.” *610 Hauling* at 11. The Commission went on to expressly warn, however, the following:

This Order shall not be cited, nor shall it serve, as precedent for other applicants who choose to exclude an express statement of their minimum two years' experience with moving household goods or the equivalent, for whom failure to comply with Section 3.381(c)(1)(iii)(A)(II)(l) shall be at their peril.

As referenced in the instant Order at fn 3, *610 Hauling* and the facts there in cannot be relied on by applicants to *not* include a statement on the 2-years' experience or the equivalent going forward. Exceptional Movers, however, did include an express statement of its equivalent experience in its Application – indeed in the application, data responses, and *pro se* Petition, Exceptional Movers detailed its extensive 7-years' experience in the moving industry and 20 years trucking experience, and how that experience meets the Commission's standards of proving technical fitness through equivalent experience. *Supra* paragraph 12.

20. Finally, the Commission's Order premises its denial entirely on the incorrect finding that Exceptional Movers was operating unlicensed and illegally, which the facts do not support, *supra* section A. The Commission's Order, however, does not discuss how Mr. Toney's 7 years of experience in the moving industry as a moving laborer with his 20-years of trucking experience does not qualify as “equivalent experience” showing his technical and financial fitness to operate safely and in compliance with the Commission's regulations. On this point, the Commission simply stated, “we find that the Applicant does not meet the “equivalent” experience requirement because none of the experience in the moving industry that has been provided was experience the Applicant obtained from a licensed carrier of household goods.” Order at 11. This statement, when viewed in light of the fact that Mr. Toney never operated an *unlicensed* carrier, amounts to an overly strict interpretation of the Commission's regulations, which ultimately reads-

out the plain language of the regulations – that the Applicant may present “equivalent” experience showing their fitness, not just a strict 2-years’ experience with a licensed household goods carrier.

52 Pa. Code § 3.381(c)(1)(iii)(A)(II)(-1-).

21. Our Supreme Court has examined the statutory meaning of “equivalent” stating:

... the Oxford Dictionary defines ‘equivalent’ as ‘having **equal or corresponding import, meaning or significance**; what is virtually the same thing; identical in effect.’ According to Webster it means ‘**equal in worth or value**, force, power, defect, import and the like; alike in significance and value; of the same import or meaning.’

*In re Bonsall's Est.*, 135 A. 724, 725 (Pa. 1927), *overruled in part by Matter of Blough's Est.*, 378 A.2d 276 (Pa. 1977). (emphasis added)

22. Applying the Pennsylvania Supreme Court’s definition of “equivalent,” Exceptional Movers and Mr. Toney’s 7 years of experience as a moving labor service plus 20-years trucking experience as described in the application, the BTUS data responses, and the *pro se* Petition has “equal or corresponding import, meaning or significance” and is “equal in worth or value” to the Commission’s “minimum 2 years of experience with a licensed household goods carrier.” His experience includes providing 7 years of moving labor experience directly to clients or through U-Haul/Elite labor portals including loading, unloading, special packing, care taken in maneuvering in households, disassembling and reassembling specialized equipment, and generally assisting customers with the loading/unloading of their rental trucks, Pods, U-boxes, or personal vehicles. The only part of a Certificated Carrier of Household Good’s operations which Mr. Toney has not done prior to filing this Application – the driving/transporting household goods from point A to Point B for compensation– does not warrant finding the applicant technically unfit to operate safely or unable to comply with the Commission’s regulations. Indeed, the Application detailed Mr. Toney’s driving experience, including 20-years trucking experience with a clean driving record. *See* Application, Verified Statement at 6.

23. As Mr. Toney has shown his 7-years' experience in the moving industry as a moving labor service and 20-years trucking experience, the Commission should find that this experience satisfies the "equivalent experience" requirement of 52 Pa. Code § 3.381(c)(1)(iii)(A)(II)(I) on this case-by-case basis.

**C. As a matter of public policy in reducing barriers to entry, under the circumstances the Applicant has shown he is technically and financially fit to be granted a certificate of public Convenience to operate as a Motor Carrier of Household Goods in Use, and the Commission should grant the Application.**

24. The Commission, as a matter of public policy to reduce barriers and create healthy competition in the moving industry, should find that Mr. Toney's application presents substantial evidence that applicant is both technically and financially fit to operate as a Motor Carrier of Household Goods. As provided by applicant, applicant's moving labor services maintain a five-star rating, and many satisfied customer reviews of his moving labor service can be found at [www.excmovers.com/reviews.html](http://www.excmovers.com/reviews.html). Mr. Toney provides safe, quality moving labor services which, with his extensive experience, will best serve customers in the transportation of household goods in the Commonwealth.

25. As a further point of Public Policy, the Commission's order regarding the two-years' experience requirement should guide the Commission to want to approve this Application under the circumstances. As the Commission discussed preceding the adoption of the amended 52 Pa. Code Chapters 3, 5, 23, 31, 32, and 41 rulemaking:

Household goods applicants will be required to establish that they have the technical and financial ability to provide the proposed service safely and legally. Toward this end, we believe that applicants ***should*** have at least two (2) years of experience with a household goods carrier, ***or the equivalent***. **This requirement would ensure that only those applicants who are familiar with the industry would be eligible to operate.** An applicant could satisfy this requirement by hiring managers with the necessary

experience. **We note that, notwithstanding this requirement, each application will be considered on its own merits.**

Proposed Rulemaking Amending 52 Pa. Code Chapters 3, 5, 23, 31, 32, and 41; Household Goods in Use Carriers and Property Carriers, Docket No. L-2013-2376902 (Order entered September 12, 2013) (Proposed Rulemaking Order), 2013 WL 5232325 (Pa.P.U.C.) 2013 WL 5232325 at \*4.

26. Indeed, the Proposed Rulemaking Order described that applicants *should* have at least two years *or the equivalent* in order to “ensure that only those applicants who are familiar with the industry would be eligible to operate.” *Id.* As can be seen by Mr. Toney’s 7-years as a moving laborer, with 20-years of trucking experience, Mr. Toney has proven he is one of the Commission’s envisioned “applicants who are familiar with the industry.” Approving this application goes to the very purpose of the Rulemaking – to allow qualified applicants to engage in the competitive market of the household goods industry.<sup>2</sup>

27. Therefore, the Commission should find that the Application of Exceptional Movers satisfies the Commission’s standards evidencing technical and financial fitness to operate and grant the Application.

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<sup>2</sup> “We believe these proposed changes are reflective of and consistent with the competitive environment that characterizes the household goods industry. Indeed, lowering these outdated barriers to entry will further promote competition in this industry, which will, in turn, provide consumers with more choices and more competition among carriers as to price, quality and reliability.” Proposed Rulemaking Order at 3-4.

**WHEREFORE**, the Exceptional Movers respectfully requests that the Pennsylvania Public Utility Commission grant this Petition for Reconsideration.

Respectfully submitted,

A handwritten signature in blue ink, appearing to be 'Todd S. Stewart', written over a horizontal line.

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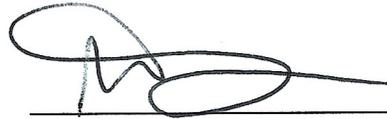
*Counsel for Exceptional Movers LLC*

DATED: March 25, 2022

# **ATTACHMENT A**

## VERIFICATION

I, Matthew Toney, certify that I am the Owner, of Exceptional Movers LLC, and that, in this capacity, I am authorized to and do make this Verification, that the facts set forth in the foregoing document are true and correct to the best of my knowledge, information and belief, and that I expect Exceptional Movers to be able to prove same at any hearing hereof. I understand that false statements made therein are made subject to the penalties in 18 Pa. C.S. §4904, relating to unsworn falsifications to authorities.

A handwritten signature in black ink, appearing to read 'Matthew Toney', is written over a horizontal line.

Matthew Toney  
Owner  
Exceptional Movers LLC

DATED: March 24, 2022