



Andrew J. Horowitz

Direct Dial: (412) 288-2461
andrew.horowitz@obermayer.com
www.obermayer.com

Obermayer Rebmann Maxwell & Hippel LLP

525 William Penn Place, Suite 1710
Pittsburgh, PA 15219
P (412) 566-1500
F (412) 281-1530

November 29, 2022

Ms. Rosemary Chiavetta
Secretary, Pennsylvania Public Utilities Commission
400 North Street
Harrisburg, PA 17120
Via Electronic Filing

RE: Application of Northeastern Movers, Inc., A-8922088; A-2022-3035356

Dear Secretary Chiavetta:

The purpose of this letter is to request reconsideration of the denial of the above application. The denial letter was served on November 29, 2022.

The application was denied on the basis that Applicant failed to sufficiently respond to a question raised in a data request dated September 26, 2022 regarding Applicant's statement of financial interests.

In Applicant's response to the data request, dated October 10, 2022, Applicant stated:

Applicant updates its statement of financial interests, attached. It appears that the discrepancy described in the data request letter was caused by the fact that the original statement omitted the funds in Applicant's investment account.

Applicant inadvertently neglected to include the revised statement of financial interest, leading to the denial. The revised statement is attached hereto as **Exhibit A**.

Applicant therefore respectfully petitions for the rescission of the denial and to have the revised statement considered as part of its application. Alternatively, please consider this letter to be a petition for reconsideration of staff action.

Sincerely,

Andrew J. Horowitz, Esquire

VERIFICATION

I, Edward T. McKeon, 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 to be able to prove the same at a 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).

Signature: Edward T. McKeon

Date: 11/29/2022

EXHIBIT A

Statement of Financial Position (Balance Sheet)
 As of (date) 8/31/22
 (Must be less than 6 months old)

ASSETS

Current Assets		
Cash <i>on hand</i>	<u>1000</u>	
Other Current Assets (specify) <i>See Below</i>	<u>127838</u>	<u>128838</u>
Total Current Assets		
Tangible Assets		
Motor Vehicle Equipment	<u>30,000</u>	
Property (buildings, land, etc.)		
Office Equipment		
		<u>158838</u>
TOTAL ASSETS		

LIABILITIES

Current Liabilities (Due within one year of date)		
Loans <i>From Owner</i>	<u>10,000</u>	
Credit cards/revolving credit	<u>34563</u>	
Other Liabilities (Attach schedule)		
Total Current Liabilities		
Long Term Liabilities (Due after one year of date)		
Mortgage		
Long term commercial loan <i>Auto Financing</i>	<u>200,000</u>	<i>Truck Financing</i>
Other Liabilities (Attach Schedule)		
Total Long-Term Liabilities		<u>244563</u>
TOTAL LIABILITIES		

Current Assets

 Checking 43965

 Investment Accounts 83873.35