

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

BUREAU OF INVESTIGATION & ENFORCEMENT

January 9, 2023

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.

Piccolo's Friendly Movers LLC Docket No. C-2022-3034244

Letter Requesting Stay Pending Execution of Settlement

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Bureau of Investigation and Enforcement's **Letter Requesting Stay Pending Execution of the Settlement** 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,

Alphonso Arnold III

Prosecutor

Bureau of Investigation and Enforcement

alphonso arnold III

PA Attorney ID No. 318487

(717) 787-3836

alphonarno@pa.gov

AA/ac Enclosures

cc: Administrative Law Judge Mary Long (via email - malong@pa.gov)

Michael L. Swindler, Deputy Chief Prosecutor (via email - mswinder@pa.gov)

As per Certificate of Service

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission, : Bureau of Investigation and Enforcement, :

Complainant

:

v. : Docket No. C-2022-3034244

:

Piccolos Friendly Movers, :

Respondent :

LETTER REQUESTING STAY PENDING EXECUTION OF SETTLEMENT

Dear Administrative Law Judge Mary D. Long:

In the Formal Complaint filed in the above-captioned matter, the Pennsylvania Public Utility Commission's ("Commission") Bureau of Investigation and Enforcement ("I&E") requested that Piccolo's Friendly Movers LLC ("Respondent") (together "the Parties") be ordered by the Commission to pay a civil penalty of \$2,700 for alleged violations of the Pennsylvania Public Utility Code and the Commission's regulations. Following I&E's filing of a Motion for Default Judgment in this matter, the Parties discussed settlement of this case.

Please be advised that the Parties have agreed to settlement of this matter. In accordance with the settlement agreement, Respondent is to satisfy the civil penalty of \$2,700 through four (4) payment installments to the Commission. The payment installments are to be made as follows:

- By December 31, 2022, Piccolos Friendly Movers must make a payment to the Commission in the amount of \$675. Payment will be deemed to have been made by December 31, 2022, if the payment is deposited in the United States mail by December 31, 2022.
- By January 31, 2023, Piccolos Friendly Movers must make a second payment to the Commission in the amount of \$675. Payment will be deemed to have been made by January 31, 2023, if the payment is deposited in the United States mail by January 31, 2023.
- By February 28, 2023, Piccolos Friendly Movers must make a third payment to the Commission in the amount of \$675. Payment will be deemed to have been made by February 31, 2023, if the payment is deposited in the United States mail by February 28, 2023.

• By March 31, 2023, Piccolos Friendly Movers must make a fourth and final payment to the Commission in the amount of \$675. Payment will be deemed to have been made by March 31, 2023, if the payment is deposited in the United States mail by March 31, 2023.

On December 30, 2022, the Commission received the first payment installment from Respondent per the settlement agreement. As a result, I&E requests that this proceeding be stayed pending execution of the settlement. I&E will file a Certificate of Satisfaction upon Respondent's completion of the terms of the settlement. If Respondent does not comply with the terms of the settlement, then I&E will request that the stay be lifted and for a ruling on its Motion for Default Judgment be made.

Should you have any questions, please do not hesitate to contact me.

Respectfully,

Alphonso Arnold III

Prosecutor

PA Attorney ID No. 318487

alphonso arnold III

Pennsylvania Public Utility Commission Bureau of Investigation and Enforcement Commonwealth Keystone Building 400 North Street Harrisburg, PA 17120 (717) 787-3836 alphonarno@pa.gov

Dated: January 9, 2023

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission, : Bureau of Investigation and Enforcement, :

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Piccolos Friendly Movers,

Respondent :

CERTIFICATE OF SERVICE

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

Service by Electronic Mail Only:

Piccolos Friendly Movers 420 Sterling Driv Red Lion, PA 17356

Email: jeff@piccolosfriendlymovers.com

Alphonso Arnold III

Prosecutor

PA Attorney ID No. 318487

Pennsylvania Public Utility Commission Bureau of Investigation and Enforcement Commonwealth Keystone Building 400 North Street Harrisburg, PA 17120 (717) 787-3836 alphonarno@pa.gov

Dated: January 9, 2023