



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

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

May 22, 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.
Travel Free LLC
Docket No. C-2023-3032534
Petition for Leave to Withdraw Complaint

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Bureau of Investigation and Enforcement's Petition for Leave to Withdraw 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 'Alphonso Arnold III'.

Alphonso Arnold III
Prosecutor
Bureau of Investigation and Enforcement
PA Attorney ID No. 318487
(717) 787-3836
alphonarno@pa.gov

AA/ac
Enclosures

cc: Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement	:	
	:	
v.	:	Docket No. C-2023-3032534
	:	
Travel Free LLC	:	

**PETITION OF THE BUREAU OF INVESTIGATION AND ENFORCEMENT
FOR LEAVE TO WITHDRAW COMPLAINT**

TO THE COMMISSION:

The Bureau of Investigation and Enforcement (“I&E”) of the Pennsylvania Public Utility Commission (“Commission”), by and through its prosecuting attorney, pursuant to 52 Pa. Code § 5.94(a), petitions for leave to withdraw the Formal Complaint (“Complaint”) in the above captioned proceeding. I&E submits the following in support thereof:

1. Travel Free LLC (“Respondent”) was issued a certificate of public convenience by this Commission at Docket No. A-2021-3029703 for paratransit authority.

2. On April 12, 2023, I&E filed a Formal Complaint docketed at Docket No. C-2023-3032534 against Respondent. In its Complaint, I&E alleged that Respondent violated Section 1102(a)(2) of the Pennsylvania Public Utility Code, 66 Pa. C.S. § 1102(a)(2), by abandoning service without first receiving Commission approval. For relief, I&E requested that the Commission revoke the certificate of public convenience issued to Respondent.

3. On April 26, 2023, the Commission at Docket No. M-2023-3037727 cancelled the Respondent's certificate of public convenience due to Respondent's failure to maintain acceptable evidence of insurance filed with the Commission.

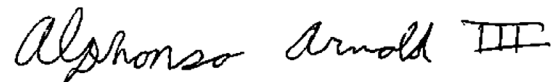
4. On May 8, 2023, Respondent filed an Answer to I&E's Formal Complaint.

5. As Respondent's certificate of public convenience was cancelled by the Commission on April 26, 2023, there is no longer any form of relief that I&E is seeking in this formal proceeding.

6. Given the analysis above, the public interest is served by the withdrawal of the Formal Complaint filed at C-2023-3032534.

WHEREFORE, for all the foregoing reasons, the Bureau of Investigation and Enforcement respectfully requests that the Commission grant this Petition.

Respectfully submitted,



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

Date: May 22, 2023

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

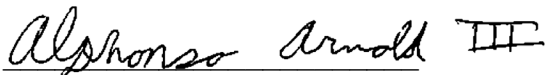
Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement	:	
	:	
v.	:	Docket No. C-2023-3032534
	:	
Travel Free LLC	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing **Petition for Leave to Withdraw** 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 First-Class Mail

Travel Free LLC
18 Red Tail Court
Limerick, Pennsylvania 19468


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
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Date: May 22, 2023