



Todd S. Stewart
Office: 717 236-1300 x242
Direct: 717 703-0806
tss Stewart@hmslegal.com

100 North Tenth Street, Harrisburg, PA 17101 Phone: 717.236.1300 Fax: 717.236.4841 www.hmslegal.com

January 5, 2024

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. Canyon Country Cab; Docket No. C-2023-3043133; **ANSWER OF CANYON
COUNTRY CABS LLC TO FORMAL COMPLAINT OF PENNSYLVANIA
PUBLIC UTILITY COMMISSION BUREAU OF INVESTIGATION AND
ENFORCEMENT**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is the Answer of Canyon Country Cabs LLC to Formal Complaint of Pennsylvania Public Utility Commission Bureau of Investigation and Enforcement in the above-captioned docket. Copies of the Answer have been served in accordance with the attached Certificate of Service.

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
Counsel for Canyon Country Cabs LLC

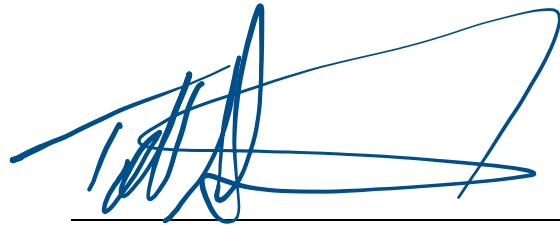
TSS/jld
Enclosure
cc: Per Certificate of Service

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).

VIA ELECTRONIC MAIL

Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
400 North Street, 3rd Floor
Harrisburg, PA 17120
RA-PCCmplntResp@pa.gov



Todd S. Stewart

DATED: January 5, 2024

6. Denied. The allegations of paragraph 6 are denied, and strict proof thereof is demanded.

7. Denied. The allegations of paragraph 7 are denied, and strict proof thereof is demanded.

8. Denied. The factual allegations in paragraph 8 are denied, the Commission's regulations speak for themselves.

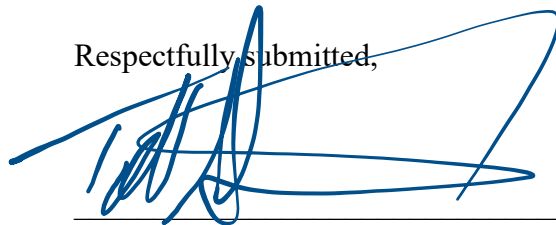
9. Denied. The factual allegations in paragraph 9 are denied, the Commission's regulations speak for themselves.

10. Denied. The factual allegations in paragraph 10 are denied, the Commission's regulations speak for themselves.

11. Denied. The factual allegations in paragraph 11 are denied, the Commission's regulations speak for themselves.

WHEREFORE, Canyon Country Cabs LLC respectfully requests that the formal complaint filed by the Commission's Bureau of Investigation and Enforcement be denied in its entirety.

Respectfully submitted,



Todd S. Stewart, Attorney ID No. 75556
Hawke McKeon & Sniscak LLP
100 North Tenth Street
Harrisburg, PA 17101
(717) 236-1300
(717) 236-4841 (fax)
tsstewart@hmslegal.com

Counsel for Canyon Country Cabs LLC

DATED: January 5, 2024

VERIFICATION

I, Tammy Oldham, certify that I am the CEO, for Canyon Country Cabs 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 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.

/s/ Tammy Oldham
Tammy Oldham, CEO
Canyon Country Cabs LLC

DATED: January 5, 2024