



COMMONWEALTH OF PENNSYLVANIA

PENNSYLVANIA PUBLIC UTILITY COMMISSION

COMMONWEALTH KEYSTONE BUILDING

400 NORTH STREET

HARRISBURG, PENNSYLVANIA 17120

<http://www.puc.pa.gov>

May 7, 2025

Docket No. A-2025-3054959

**FLEX STORAGE INC
1065 SW 8TH ST PMB 5012
MIAMI FL 33130**

Re: Application of Flex Storage, Inc., 1065 SW 8th St., PMB 5012, Miami, FL 33130. 626-463-3114

To Whom It May Concern:

On May 5, 2025, the application of FLEX STORAGE, INC., was accepted by the Commission; however, multiple issues must be addressed before publication to the Pennsylvania Bulletin may proceed. Please review page three of this correspondence for additional information and respond appropriately.

Please forward the information to the Secretary of the Commission **within ten (10) working days** from the date of this letter. **Currently, the only acceptable means of filing your response is through the Commission's e-file system. Information on how to efile is available at the following link: <https://www.puc.pa.gov/>**

Your answers should be verified per 52 Pa Code § 1.36. Accordingly, you must provide the following statement with your responses:

I, _____, 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).

The blank should be filled in with the name of the appropriate company representative, and the signature of that representative should follow the statement.

Please submit your response to the address cited in this letter's header. Faxes, emails, and other forms of filing are unacceptable.

Sincerely,

A handwritten signature in black ink that reads 'Matthew L. Homsher'.

Matthew L. Homsher, Secretary

Enclosure

cc: Josh Kwiatkowski

Docket No. A-2025-3054959
FLEX STORAGE, INC.
Data Request

1. In your verified statements you don't indicate the presence of any Pennsylvania-based facilities; where will local vehicles for service in Pennsylvania be stored? Will there be no local storage or office facilities?
2. Question #5 of the applicant's verified statements requires that you describe your hiring and employment policies. You are expected to provide a PLAN that satisfies all of the requirements of 52 Pa Code. Stating that your policies meet or exceed, "X, Y, or Z" does not demonstrate to the Commission what your policies are. Please review the requirements of the following chapters of 52 Pa Code and provide a revised compliant plan for drivers which specifically addresses these issues.
 - 52 Pa Code § 37.204, 49 CFR 391.25 - Driver history. (schedule and storage of records)
 - 52 Pa Code § 31.134 - Criminal history. (schedule and storage of records)
3. Your response to Question #6 of the verified statements is inadequate – please provide a response which addresses the issue completely. Additionally, fully explain how one 2022 Dodge RAM Pickup truck is sufficient to provide Household Goods in Use service throughout Pennsylvania.
4. Please review the below criteria and submit a revised compliant Statement of Financial Position.
 - a. The statement presented must be **DATED and comprised of information which is less than 6 months old.**
 - b. The submission **MUST be comprised of information which is accurate as of the date provided.**
 - c. **The information is to be exact and should not include estimates or approximations when accurate numbers are available.**
 - d. **ALL relevant assets and debts are to be included (for example: vehicle loan balances/vehicle asset value, etc.).**
 - e. The information provided is also to be strictly limited to assets and debts **HELD BY THE APPLICANT (FLEX STORAGE, INC.), and not the**

The purpose of the verified statement questions is to determine your ability to provide safe, efficient, and reasonable transportation. It is in your best interest to provide accurate, complete, and timely responses. Failure to do so is sufficient grounds to justify the denial of your application **because YOU have failed to provide sufficient evidence of your fitness to operate.** Be advised that additional corrections may not always be requested; therefore, prior to submitting your responses, your consultation with an attorney or financial expert familiar with Commission regulated Motor Carrier related proceedings is highly encouraged.

individual member(s). Any property and accounts listed MUST be registered or titled to the corporation. Bank accounts must be in the name of **FLEX STORAGE, INC..** Vehicles must be registered to **FLEX STORAGE, INC..** Property must be titled to **FLEX STORAGE, INC.** If these items are not in the name of **FLEX STORAGE, INC.,** they should **NOT be included on the balance sheet.**

To further assist the Commission in verifying the accuracy of your presented balance sheet, please provide either a copy of a bank statement, or a signed letter from a bank executive, verifying the current account balance(s) and showing the account holder name as **FLEX STORAGE, INC..** Also, please provide proof of purchase/registration for **FLEX STORAGE, INC.,** of any and all vehicle assets.

The purpose of the verified statement questions is to determine your ability to provide safe, efficient, and reasonable transportation. It is in your best interest to provide accurate, complete, and timely responses. Failure to do so is sufficient grounds to justify the denial of your application because YOU have failed to provide sufficient evidence of your fitness to operate. Be advised that additional corrections may not always be requested; therefore, prior to submitting your responses, your consultation with an attorney or financial expert familiar with Commission regulated Motor Carrier related proceedings is highly encouraged.