

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PUC Docket No: A-2025-3054038

Application of Helping Hands Warming Hearts Transport, LLC

PETITION FOR RECONSIDERATION FROM STAFF ACTION

1. On April 22, 2025, Helping Hands Warming Hearts Transport, LLC (“Helping Hands”) filed an Application.
2. Said application listed the below as its attorney of record.
3. On April 23, 2025. This Commission mailed correspondence dated April 23, 2025, to Christopher P. Fiore, Esquire of Fiore & Barber, LLC at 418 Main Street, Harleysville, PA 19438 requesting a verification. See April 23, 2025 correspondence attached hereto.
4. Also included therewith was a Request For Information pertaining to certain information that Helping Hand needed to include/supplement as part of its application.
5. On or about July 1, 2024, Fiore & Barber, LLC moved from the address of 418 Main Street, Harleysville, PA 19438 to a temporary new location as a result of renovations being performed at its offices.
6. All mail was forwarded and has been being delivered to a new temporary address of 1690 Sumneytown Pike, St. 250, Lansdale, PA 19446 thereafter.
7. Notwithstanding, the April 23, 2025 correspondence for this Commission was never delivered to or received by Fiore & Barber, LLC.

8. This law firm has represented and continues to represent Helping Hands in matters before this Commission.

9. On May 28, 2025, this Commission issued a denial and dismissal of Helping Hands application in large part because of the failure of Fiore & Barber, LLC to provide the necessary verification and failure to include the Requested Information. See April 23, 2025 correspondence attached hereto.

10. The May 28, 2025 denial and dismissal was never delivered or received by Fiore & Barber, LLC.

11. Upon receipt of the denial and dismissal by Helping Hands, Fiore & Barber, LLC reviewed the docket and learned, for the first time, of the April 23, 2025 request and failure to respond.

12. Helping Hands and Fiore & Barber, LLC's failure to respond and comply was completely due to the failure to receive the correspondence and requests.

13. Helping Hands and Fiore & Barber, LLC are requesting that this Commission reconsider the denial and dismissal and based upon circumstances, which were outside of the applicant's control, re-open the application.

14. Attached hereto is the verification and full and complete responses to each Request For Information.

15. Failure to grant the relief requested would unfairly prejudice Helping Hands in that it would have to start the entire application process again, would lose time, and forfeit and have to pay another application fee.

16. All as a result of the breakdown of the postal system.

17. For all of these reasons, Applicant, Helping Hands, requests Reconsideration of the Denial of Its Application.

Respectfully submitted,
Fiore & Barber, LLC

Dated: June 9, 2025

By: *Christopher P. Fiore*
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