

BEFORE THE PENNSYLVANIA PUBLIC UTILITIES COMMISSION

In the matter of NORTHEASTERN MOVERS, INC.

A-8922088

A-2024-3046642

PETITION TO REINSTATE OPERATING AUTHORITY

Petitioner Northeastern Movers, Inc. hereby petitions for the reinstatement of its operating authority and states as follows:

1. Petitioner is a Household Goods Mover with Pennsylvania operations based in Scranton. Petitioner's owner, Edward McKeon, has over twenty years of experience in the household goods moving industry. Petitioner is a licensed household goods carrier in New York since 2020, and secured Pennsylvania operating authority for household goods in-use on September 3, 2024 and property other than household goods on September 30, 2024.

2. On November 1, 2024, Northeastern's liability carrier, Progressive (d/b/a United Financial Casualty Company) filed a Form K (notice of cancellation) with the Commission, with an effective Date of December 6, 2024. (**Exhibit A**).

3. On December 26, 2024, Northeastern's new liability carrier, Prime Insurance Company, filed a Form E with a retroactive effective date of December 13, 2024. The Form E was rejected by the Commission for technical reasons, and Prime Insurance's underwriter failed to correct the filing. (Exhibit A).

4. On March 27, 2024, Northeastern was included in a Tentative Order by the Commission cancelling the authority of numerous utilities for not maintaining evidence of insurance on file.

5. On May 22, 2024, the Commission purports to have mailed a cancellation letter to Petitioner. The address for Petitioner is incorrect, however, as the zip code only contains four digits. (**Exhibit B**).

6. On June 3, 2024, the Commission purports to have mailed a corrected version of the May 22, 2024 letter. The address in this letter still shows the incorrect four-digit zip code. (**Exhibit C**).

7. Petitioner did not receive the March 27, 2024 Tentative Order or the May 22 and June 3, 2024 letters. (**Exhibit D** – McKeon Declaration, ¶ 5).

8. On Thursday July 10, 2025, Petitioner's owner, Edward McKeon, was seeking to report an unlicensed mover in his area and looked at the PUC website to confirm that the competitor was not on the list of certificated movers. (Exhibit D, ¶ 6). Upon reviewing the list, he was surprised to find that Northeastern Movers was also not on the list. (Exhibit D, ¶ 6). Upon further reviewing the PUC's website, he found the June 3, 2025 cancellation letter. (Exhibit D, ¶ 6). This was the first time that he was aware that Northeastern's authority had been suspended and cancelled, or that there was any problem with his insurance certificates. (Exhibit D, ¶ 7).

9. The Commission has identified five factors which are particularly relevant to the determination of a petition to reinstate: (1) the amount of time which elapsed between the cancellation of the certificate of public convenience and the filing of the petition to reinstate; (2) whether the petitioner has a record of habitually violating the Code or the Commission's Regulations; (3) the reasonableness of the excuse given for the violation that caused the certificate of public convenience to be canceled; (4) whether the petitioner has implemented procedures to prevent a recurrence of the circumstances giving rise to the subject complaint; and (5) whether the petitioner is in compliance with the requirement that all assessments must be

current prior to reinstatement. *See, e.g., Pa. PUC v. Limo Today, Inc.*, Docket No. A-00124027 (Opinion and Order entered August 27, 2020); *Re: M.S. Carriers, Inc.*, Docket No. A-00110601 (Opinion and Order entered May 4, 1999); *Pa. PUC v. Grimm Motors*, Docket No. A-00111048, et al. (Opinion and Order entered May 1, 1998); *Re: Bishop*, 58 Pa. P.U.C. 519 (1984).

10. These factors weigh in favor of reinstatement. While a year has passed since the cancellation of Petitioner's authority, Petitioner only learned about this cancellation a few days ago. Petitioner has no record of violating the Code or the Commissions' Regulations. Petitioner's unawareness of the cancellation is reasonable. Furthermore, this results from a technical error by an insurance underwriter, not a failure to maintain insurance. Northeastern had (and continues to have) liability coverage. (**Exhibit E**). Petitioner has no unpaid civil assessments or penalties.

11. With regard to the fourth factor: Petitioner intends to set a calendar reminder to review the PUC's website each month on the first of the month, to ensure that his authority remains active and his insurance is current.

12. The Commission has previously rescinded the cancellation of a motor carrier where an error by an insurance underwriter led to cancellation for failure to maintain evidence of insurance on file *See Re: New Beginning's Moving & Hauling LLC*, Docket No. A-8925028 (Opinion and Order entered September 21, 2023). Here, unlike in *New Beginning's*, there was a delay between the cancellation and the carrier's filing of the instant Petition, but this is not Petitioner's fault. Had Mr. McKeon been aware of the problem, he would have acted immediately—he has been operating a licensed moving company for over twenty years.

13. Because the standard is met, the Commission should reinstate Petitioner's operating authority.

WHEREFORE, Petitioner Northeastern Movers, Inc. respectfully requests that its operating authority to operate as a motor common carrier of household goods in-use and property other than household goods be reinstated.

Dated: July 15, 2025

Respectfully Submitted,

/s/Andrew J. Horowitz, Esq.

Andrew J. Horowitz, Esq.

Pa. ID No. 311949

OBERMAYER REBMANN MAXWELL & HIPPEL LLP

525 William Penn Place, Ste. 1710

Pittsburgh, PA 15219

412-288-2461

andrew.horowitz@obermayer.com

Counsel for Petitioner

EXHIBIT A

Horowitz, Andrew

From: Santa, Maria <msanta@pa.gov>
Sent: Friday, July 11, 2025 11:23 AM
To: Roth, Tatjana
Subject: Northeastern Movers, A-8922088

3826004	Name NORTHEASTERN MOVERS INC	Form: Form E	State: PA	Status: Accepted
	Address 105 WEST MARKET STREET SCRANTON, PA 18508	Type Of Authority Truck - household goods in use, Truck - general freight (incl. new & office furniture)	Policy: CA963894702	Last Action Date: 09/24/2024
	State MC ID 8922088	Reinstate: NO	Insurer: United Financial Casualty Company	Effective Date: 09/10/2024
	USDOT:	Effective: 09/10/2024		Submit Date: 09/24/2024 07:47:32
	FMCSA:	Submit: 09/24/2024 07:47:32		

Notes to State:

Notes from State:

Form H still needed to meet compliance.

3856778	Name NORTHEASTERN MOVERS INC	Form: Form K	State: PA	Status: Accepted
	Address 105 WEST MARKET STREET SCRANTON, PA 18508	Cancel Cargo Cancel BIPD YES	Policy: CA963894702	Last Action Date: 11/01/2024
	State MC ID 8922088	Reinstate: NO	Insurer: United Financial Casualty Company	Effective Date: 12/06/2024
	USDOT:	Effective: 12/06/2024		Submit Date: 11/01/2024 05:36:22
	FMCSA:	Submit: 11/01/2024 05:36:22		

Notes to State:

Notes from State:

3896106	Name Northeastern Movers Inc	Form: Form E	State: PA	Status: Rejected
	Address 105 W Market St Scranton, PA 18508	Type Of Authority Truck - household goods in use	Policy: SC24122113	Last Action Date: 12/27/2024
	State MC ID 8922088	Reinstate: NO	Insurer: Prime Insurance Company	Effective Date: 12/13/2024
	USDOT: 3271670	Effective: 12/13/2024		Submit Date: 12/26/2024 03:41:38
	FMCSA:	Submit: 12/26/2024 03:41:38		

Notes to State:

Notes from State:

Carrier holds multiple authorities that require coverage. Contact us at 717-787-1227 to clarify.



www.puc.pa.gov



Maria Santa
Compliance Specialist
TUS/Motor Carrier

Phone: 717-787-4086
Email: msanta@pa.gov
Compliance Hotline:
717-787-3834
Insurance Hotline:
717-787-1227

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EXHIBIT B



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET
HARRISBURG, PENNSYLVANIA 17120
<http://www.puc.pa.gov>

IN REPLY PLEASE
REFER TO OUR FILE

May 22, 2025

M-2025-3053520
A-2024-3046642
A-8922088

NORTHEASTERN MOVERS INC
105 WEST MARKET STREET
SCRANTON PA 1508

Re: Cancellation of Certificate(s) of Public Convenience Docket No. A-2024-3046642

To Whom it May Concern:

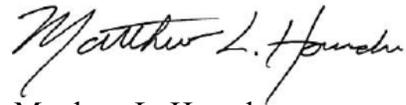
On March 27, 2025, the Commission entered a Tentative Order, Docket No. M-2025-3053520, which advised Northeastern Movers Inc that it was not in compliance with the insurance requirements of 66 Pa.C.S. § 512. The Tentative Order advised Northeastern Movers Inc, that it must, within 30 days of publication of the Tentative Order, either have acceptable evidence of insurance filed with the Commission or cancel their authority or file comments to the Tentative Order. The Tentative Order advised Northeastern Movers Inc, that, if it failed to respond, its certificate of public convenience would be cancelled. The Tentative Order was served on Northeastern Movers Inc and published in the *Pennsylvania Bulletin*.

Northeastern Movers Inc failed to respond to the March 27, 2025, Tentative Order and remains in non-compliance with the insurance requirements of the Public Utility Code at 66 Pa.C.S. § 512.

Furthermore, this Commission will request the Pennsylvania Department of Transportation to put an administrative hold on Respondent's vehicle registrations. Respondent will **NOT** be able to register any new vehicles or renew any existing vehicle registrations until a new application for authority is submitted. Additionally, all unpaid fines or assessments accrued while you had authority, are still due.

YOU ARE ADVISED: That the certificate(s) issued at Docket No. A-2024-3046642 be and is hereby *cancelled*, and all rights, powers, and privileges granted thereby shall forthwith cease and terminate.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew L. Homsher". The signature is written in a cursive style with a large initial "M".

Matthew L. Homsher
Secretary

cc: Secretary's Bureau – File
Bureau of Investigation and Enforcement – Safety Division
Bureau of Administrative Services – Fiscal
PA Department of Transportation
PA Department of Revenue

EXHIBIT C



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET
HARRISBURG, PENNSYLVANIA 17120
<http://www.puc.pa.gov>

IN REPLY PLEASE
REFER TO OUR FILE

June 3, 2025
(Corrected)

M-2025-3053520
A-2024-3046642
A-2024-3050934
A-8922088

NORTHEASTERN MOVERS INC
105 WEST MARKET STREET
SCRANTON PA 1508

Re: Cancellation of Certificate(s) of Public Convenience Docket No. A-2024-3046642

To Whom it May Concern:

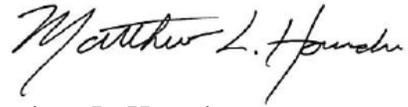
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YOU ARE ADVISED: That the certificate(s) issued at Docket No. A-2024-3046642 & A-2024-3050934 be and is hereby *cancelled*, and all rights, powers, and privileges granted thereby shall forthwith cease and terminate.

Sincerely,

A handwritten signature in black ink, reading "Matthew L. Homsher". The signature is written in a cursive style with a large initial "M" and a long, sweeping underline.

Matthew L. Homsher
Secretary

cc: Secretary's Bureau – File
Bureau of Investigation and Enforcement – Safety Division
Bureau of Administrative Services – Fiscal
PA Department of Transportation
PA Department of Revenue

EXHIBIT D

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of Northeastern Movers, Inc to
Reinstate Operating Authority

Docket #A-2024-3046642

AFFIDAVIT OF EDWARD MCKEON

I, Edward T. McKeon, being duly sworn according to law, depose and say that the facts above set forth are true and correct to the best of my knowledge, information and belief and I expect to be able to prove the same at any hearing hereof.

1. I am the sole shareholder of Northeastern Movers, Inc (“Northeastern”).
2. I am an adult individual and competent to make this Affidavit.
3. I have worked in the household goods moving industry since 1998. I started when I was in high school. In 2002, I founded my first licensed moving company with a partner. I founded my second licensed moving company with another partner in 2014. In 2019, I founded Northeastern Movers, which secured interstate operating authority in 2019 and New York operating authority in 2020. While my business was in New York, I had purchased a home in the Scranton area and decided to expand my business to Pennsylvania.
4. In all of my businesses, I continuously maintained liability and cargo insurance and have never had any operating authority cancelled in the past for non-compliance.
5. I did not receive the March 27, 2024 Tentative Order or the May 22, 2024 and June 3, 2024 cancellation letters.
6. On Thursday, July 10, 2025, I was seeking to report an unlicensed mover in my area. I reviewed the list of certificated movers on the PUC’s website to confirm that this mover

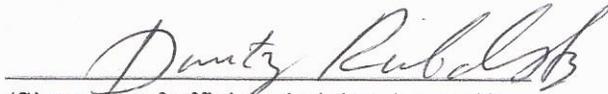
was unlicensed, and was surprised to find that Northeastern Movers was also not on the list. I then further reviewed the PUC's website and found a copy of the June 3, 2025 cancellation letter.

7. Prior to July 10, 2025, I was unaware that Northeastern Movers' operating authority had been suspended or cancelled, or that there was any problem with my insurance certificates.



EDWARD MCKEON, Affiant

Sworn and subscribed before me this 15 day of July, 2025



(Signature of official administering oath)

04-19-2027

(My Commission Expires)

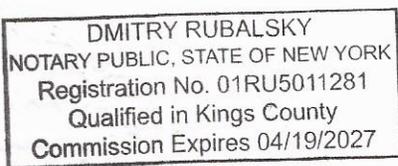


EXHIBIT E



CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)

7/11/2025

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER World Insurance Associates, LLC 656 Shrewsbury Ave Suite 200 Tinton Falls NJ 07701	CONTACT NAME: Jose Caraballo PHONE (A/C. No. Ext): 732-780-3900 E-MAIL ADDRESS: Josecaraballo@worldinsurance.com		FAX (A/C. No): 732-780-3998													
	<table border="1"> <thead> <tr> <th>INSURER(S) AFFORDING COVERAGE</th> <th>NAIC #</th> </tr> </thead> <tbody> <tr> <td>INSURER A : Century Surety Company</td> <td>36951</td> </tr> <tr> <td>INSURER B : United Wisconsin Insurance Company</td> <td>29157</td> </tr> <tr> <td>INSURER C : Hanover Insurance Company</td> <td>22292</td> </tr> <tr> <td>INSURER D : Ategrity Specialty Insurance Company</td> <td>16427</td> </tr> <tr> <td>INSURER E : Progressive Casualty Insurance Company</td> <td>24260</td> </tr> <tr> <td>INSURER F : Travelers Insurance Company of Canada</td> <td></td> </tr> </tbody> </table>			INSURER(S) AFFORDING COVERAGE	NAIC #	INSURER A : Century Surety Company	36951	INSURER B : United Wisconsin Insurance Company	29157	INSURER C : Hanover Insurance Company	22292	INSURER D : Ategrity Specialty Insurance Company	16427	INSURER E : Progressive Casualty Insurance Company	24260	INSURER F : Travelers Insurance Company of Canada
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INSURED Northeastern Movers Inc. 105 W Market St Scranton PA 18508	NORTMOV-01															

COVERAGES

CERTIFICATE NUMBER: 589714403

REVISION NUMBER:

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
D F	COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR <input checked="" type="checkbox"/> Blanket AI <input checked="" type="checkbox"/> Primary&Non-cont GEN'L AGGREGATE LIMIT APPLIES PER: <input checked="" type="checkbox"/> POLICY <input type="checkbox"/> PRO-JECT <input type="checkbox"/> LOC OTHER:	Y	Y	01-C-PK-P20144530-0 107459600	6/16/2025 6/16/2025	6/16/2026 6/16/2026	EACH OCCURRENCE \$ 1,000,000 DAMAGE TO RENTED PREMISES (Ea occurrence) \$ 100,000 MED EXP (Any one person) \$ 5,000 PERSONAL & ADV INJURY \$ 1,000,000 GENERAL AGGREGATE \$ 2,000,000 PRODUCTS - COMP/OP AGG \$ 2,000,000 Employee Liability \$ 1,000,000
E	AUTOMOBILE LIABILITY <input type="checkbox"/> ANY AUTO <input type="checkbox"/> OWNED AUTOS ONLY <input checked="" type="checkbox"/> SCHEDULED AUTOS <input type="checkbox"/> HIRED AUTOS ONLY <input type="checkbox"/> NON-OWNED AUTOS ONLY <input checked="" type="checkbox"/> Physical Dmg <input checked="" type="checkbox"/> \$1,000 Ded.			02082450	4/29/2025	4/29/2026	COMBINED SINGLE LIMIT (Ea accident) \$ 1,000,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$ UM/UIIM \$ 35,000
A	UMBRELLA LIAB <input checked="" type="checkbox"/> OCCUR <input checked="" type="checkbox"/> EXCESS LIAB <input type="checkbox"/> CLAIMS-MADE <input type="checkbox"/> DED <input checked="" type="checkbox"/> RETENTION \$ 10,000	Y	Y	CCP1194569	12/21/2024	12/21/2025	EACH OCCURRENCE \$ 5,000,000 AGGREGATE \$ 5,000,000 \$
B	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below	Y/N <input type="checkbox"/>	N/A	WC532-00099-0189-SZ	7/21/2024	7/21/2025	<input checked="" type="checkbox"/> PER STATUTE <input type="checkbox"/> OTH-ER E.L. EACH ACCIDENT \$ 100,000 E.L. DISEASE - EA EMPLOYEE \$ 100,000 E.L. DISEASE - POLICY LIMIT \$ 500,000
C	Motor Truck Cargo Warehouse Legal Liability			IHE M070554	6/12/2025	6/12/2026	\$1,000 Deductible 50,000 \$1,000 Deductible 100,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

RE: A-8922088

Evidence of Insurance. Forms E & Form H filings to follow.

CERTIFICATE HOLDER**CANCELLATION**

Commonwealth of Pennsylvania
 Pennsylvania Public Utility Commission
 Commonwealth Keystone Building
 400 North Street
 Harrisburg PA 17120

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE

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