



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

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

September 12, 2025

**Via Electronic Filing**

Matthew L. Homsher, 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.  
Kenneth R. High T/A Kenneth High Trucking  
Docket No. C-2025-3051732  
**I&E Motion for Default Judgment**

Dear Secretary Homsher:

Enclosed for electronic filing please find the Bureau of Investigation and Enforcement's **Motion for Default Judgment** 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 blue ink, appearing to read 'G. Rosul', written over a light blue horizontal line.

Grant Rosul  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 318204  
(717) 783-5243  
[grosul@pa.gov](mailto:grosul@pa.gov)

GR/nb  
Enclosures

cc: Allison C. Kaster, Director, I&E (via email – [akaster@pa.gov](mailto:akaster@pa.gov))  
Carrie B. Wright, Deputy Chief Prosecutor, I&E (via email – [carwright@pa.gov](mailto:carwright@pa.gov))  
As per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement,	:	
Complainant	:	
	:	
v.	:	Docket No. C-2025-3051732
	:	
Kenneth R. High	:	
T/A Kenneth High Trucking,	:	
Respondent	:	

**NOTICE TO PLEAD**

The Bureau of Investigation and Enforcement (“I&E”) of the Pennsylvania Public Utility Commission (“Commission”) has filed a Motion for Default Judgment in the above-captioned matter, pursuant to the Commission’s regulations at 52 Pa. Code § 5.103. You are hereby notified to file a written response within twenty (20) days of the service of the Motion, consistent with 52 Pa. Code § 5.61.

Your Answer must be verified, pursuant to 52 Pa. Code § 1.36, and the original sent to:

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

Additionally, you must serve a copy on the undersigned prosecutor.



---

Grant Rosul  
Prosecutor  
PA Attorney ID No. 318204

Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120  
(717) 783-5243  
[grosul@pa.gov](mailto:grosul@pa.gov)

Dated: September 12, 2025

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement,	:	
Complainant	:	
	:	
v.	:	Docket No. C-2025-3051732
	:	
Kenneth R. High	:	
T/A Kenneth High Trucking,	:	
Respondent	:	

**MOTION FOR DEFAULT JUDGMENT**

NOW COMES the Pennsylvania Public Utility Commission’s (“Commission”) Bureau of Investigation and Enforcement (“I&E”), by its prosecuting attorney, and files this Motion for Default Judgment against Kenneth R. High T/A Kenneth High Trucking (“Respondent”) pursuant to Section 5.103 of the Commission’s regulations, 52 Pa. Code § 5.103. In support thereof, I&E respectfully represents as follows:

1. I&E commenced this action on January 8, 2025, by filing a Complaint against Respondent alleging violations of the Public Utility Code.

2. The Complaint alleged that Respondent violated 66 Pa.C.S. §§ 1101 and 3310 by transporting property between points in Pennsylvania for compensation while not possessing a certificate of public convenience from the Commission authorizing Respondent to provide intrastate transportation of property for compensation.

3. On January 8, 2025, the Complaint was first served on Respondent by certified mail at the address on record with the Commission at the time of service, 99 Creek Road, Newville, PA 17241.

4. The Complaint was not delivered by the United States Postal Service.

5. In the interim, on January 13, 2025, Respondent filed an application for a certificate of public convenience to transport property intrastate for compensation, at A-2025-3054425.

6. Pursuant to 52 Pa. Code §1.53(e), to satisfy service of the Complaint, it was subsequently published in the *Pennsylvania Bulletin* on February 22, 2025.

7. Attached to the Complaint was a Notice advising Respondent that it must file an Answer within twenty (20) days of service of the Complaint.

8. The Notice also advised Respondent that if it failed to answer the Complaint, I&E would request that the Commission issue an Order imposing the penalty set forth in the Complaint.

9. The twenty (20) days to file an Answer to the Complaint expired on March 14, 2025.

10. On or about April 28, 2025, the Commission received notice of Respondent's address change to 50 Willis Road, Newville, PA 17241.

11. On April 29, 2025, Respondent filed an Application to regain Authority to transport property between points in Pennsylvania for compensation.

12. On or about May 1, 2025, I&E sent Respondent a letter to the updated address requesting that it file an Answer to the Complaint within 20 days of receipt of the letter or pay the civil penalty requested in the Complaint.

13. On or about June 18, 2025, I&E again sent Respondent a letter requesting that it file an Answer to the Complaint within 20 days of receipt of the letter or pay the civil penalty requested in the Complaint.

14. Respondent failed to file an Answer to the Complaint or pay the civil penalty requested in the Complaint.

15. Pursuant to Section 5.61(c) of the Commission's regulations, a Respondent who fails to file an Answer to a Complaint within the 20-day response period may be deemed in default, and the relevant facts stated in the Complaint may be deemed admitted. 52 Pa. Code § 5.61(c).

16. The Commonwealth Court has upheld the Commission's authority to sustain complaints that are not answered within twenty days. *See Fusaro v. Pa. Pub. Util. Comm'n*, 382 A.2d 794, 797 (Pa. Cmwlth. 1978).

17. Respondent violated 66 Pa.C.S. §§ 1101 and 3310 as detailed in the Complaint.

18. On July 9, 2025, Respondent's Application at A-2025-3054425 was dismissed.

19. I&E respectfully requests that the Commission enter a Default Order against

Respondent that:

- a. Directs Respondent to pay a civil penalty of \$200, within thirty (30) days of the date of a Commission Final Order;
- b. If payment of the civil penalty is not made, the Bureau of Investigation and Enforcement requests that the matter be referred to the Pennsylvania Office of Attorney General for appropriate action.

Respectfully submitted,



Grant Rosul  
Prosecutor  
PA Attorney ID No. 318204

Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120  
(717) 783-5243  
[grosul@pa.gov](mailto:grosul@pa.gov)

Date: September 12, 2025

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement,	:	
Complainant	:	
	:	
v.	:	Docket No. C-2025-3051732
	:	
Kenneth R. High	:	
T/A Kenneth High Trucking,	:	
Respondent	:	

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing Motion for Default Judgment, 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).

**Service via First-Class Mail**

Kenneth Ray Trucking  
T/A Kenneth High Trucking  
50 Willis Road  
Newville, PA 17241



---

Grant Rosul  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 318204  
(717) 783-5243  
[grosul@pa.gov](mailto:grosul@pa.gov)

Dated: September 12, 2025