



**COMMONWEALTH OF PENNSYLVANIA**

PENNSYLVANIA PUBLIC UTILITY COMMISSION

COMMONWEALTH KEYSTONE BUILDING

400 NORTH STREET

HARRISBURG, PENNSYLVANIA 17120

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

September 16, 2025

Docket No. A-2025-3057370

**DAVID TEMPLE ESQ  
111 BUCK RD BLDG 500 STE 1  
HUNTINGDON VALLEY PA 19006**

**RE: Application of SUUN, LLC, 8030 Ryers Avenue, Apt A, Philadelphia, PA 19111. 215-936-4702**

To Whom It May Concern:

On September 9, 2025, the application of SUUN, LLC, 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 is available at the following link to efile: <https://www.puc.state.pa.us/>**

**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". The signature is written in a cursive style.

Matthew L. Homsher, Secretary

Enclosure

cc: Josh Kwiatkowski

Docket No. A-2025-3057370  
SUUN, LLC  
Data Request

1. In your responses to Questions No. 3 and 4, either “shareholders” or “[a]ll owners” are mentioned. This information conflicts with other statements in the application that indicate that Mr. Mohammed Elsanousi is the owner and sole member. Can you please provide clarification on the applicant’s membership and an explanation of the entry of any potentially erroneous information which is a part of the applicant’s sworn testimony where Mr. Elsanousi has identified himself as the party providing the statement.
2. Question #6 contains multiple parts; each of which is essential to determine your fitness to operate. Answer each portion of the question in its entirety.
3. In response to Question #7 – can you provide any evidence or details of your routine maintenance schedule? For example, what is your vehicle inspection criteria to place a vehicle out of service? Is there a checklist for drivers, etc., and could you provide the Commission a written sample of the policy/checklists?
4. What is your projected annual cost for commercial paratransit coverage and which companies provided you with coverage quotes? Have you verified that the policy would support the filing of the required Form E with the Commission? It is not possible to determine your financial fitness without being able to fully consider your operating costs (such as insurance premiums).
5. 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.** Property and vehicle valuations may be approximations; however, if the valuation is higher than typical Kelly Blue Book (or similar) valuations, you should provide an explanation as to why (e.g. vehicle with an installed wheelchair lift, etc). Bank accounts and loan balances should be exact amounts (rounded to the nearest dollar).
  - d. **ALL** relevant **assets and debts** are to be included (**for example: vehicle loan balances/vehicle asset value, lease expenses, etc.**).

- e. **The information provided is also to be strictly limited to assets and debts HELD BY THE APPLICANT (SUUN, LLC), and not the individual member(s). Any property and accounts listed MUST be registered or titled to the corporation. Bank accounts must be in the name of SUUN, LLC. Vehicles must be registered to SUUN, LLC. Property must be titled to SUUN, LLC. If these items are not in the name of SUUN, LLC, should NOT be included on the balance sheet.**

If you have not fully funded and equipped the business, now is the time to do so (before re-submitting your corrections). Applicants lacking suitable finances, resources, and equipment will be denied authority.

**Finally, in order to fully assist the Commission in verifying your financial fitness**, please provide supporting documentation for the statement of financial position (balance sheet). Acceptable means of support include current copies of bank statements (account numbers may be redacted), and notarized/official statements of account balances/ownership provided by bank officers (with current contact information). Any and all claimed vehicles or land/buildings must also include proof of ownership/registration - vehicle registrations, property titles, purchase agreements, etc.

**You are encouraged to enlist professional financial assistance if you experience difficulty in constructing your statement of financial position. Be advised that failing to provide an acceptable financial statement is sufficient grounds for the denial of your application.**