

BEFORE THE PENNSYLVANIA PUBLIC UTILITIES COMMISSION

In the matter of Application of Drew Moves, LLC, t/a Drew Moves

A-8928382

A-2025-3058207

**REPLY TO OPPOSITION OF DANIEL HOOVEN TO PETITION FOR
RECONSIDERATION OF DENIAL OF APPLICATION FOR OPERATING
AUTHORITY TO TRANSPORT HOUSEHOLD GOODS IN-USE**

Petitioner Drew Moves, LLC t/a Drew Moves (“Drew Moves”) hereby submits a Reply to the Opposition of Daniel Hooven to Drew Moves’ Petition for reconsideration of the denial of its application for operating authority by the Bureau of Technical Utility Services and states as follows:

1. Daniel Hooven is a disgruntled former client of Miracle Movers of Pittsburgh (“Miracle”), which is a certificated moving company that Applicant’s owner, Andrew Zeffiro, is a former employee of. Mr. Hooven has filed an enforcement complaint against Miracle, at Dkt. C-2025-3056319. When Miracle did not respond to this complaint as it has ceased operating, Mr. Hooven filed a near-identical complaint against Drew Moves at Dkt. C-2025-3057902, which was dismissed as improperly filed on December 5, 2025. He also filed a protest in the instant case on November 24, 2025, despite no formal protest period being opened by the Commission.¹

2. Mr. Hooven does not have standing in this case. Generally, the Commission has held that a person or entity has standing when the person or entity has a direct, immediate and substantial interest in the subject matter of a proceeding. *Joint Application of Pennsylvania-American Water Co. and Evansburg Water Co. for Approval of the transfer, by sale, of the water works property and rights of Evansburg Water Co. to Pennsylvania-American Water Co.*, A-

¹ Drew Moves has not formally responded to his protest as the protest period is not yet open.

212285F0046/47 and A-210870F01 (July 9, 1998). To have a substantial interest means that there must be some discernible adverse effect to some interest of the complaining party other than the abstract interest of all citizens in having others comply with the law. *In Re Francis Edward McGillick Foundation*, 537 Pa. 194, 642 A.2d 467 (1994). To have a direct interest means that the aggrieved party must show causation of the harm to his interest by the matter of which he complains. *Id.* To have an immediate interest means that the nature of the causal connection between the action complained of and the injury to the person challenging it is sufficiently close to present a justiciable controversy. *Id.* Requiring a person or entity to have a direct, immediate and substantial interest in the subject matter of a proceeding helps avoid frivolous, harassing lawsuits whose costs are ultimately borne, at least in part, by utility ratepayers. *See Pennsylvania Public Utility Commission v. National Fuel Gas Distribution Corp.*, 73 Pa. P.U.C. 552 (1990).

3. In *Application of Kutztown Area Transport Service, Inc.*, A-2009-2140250; 2010 Pa. PUC LEXIS 2150 (PA PUC Mar. 12, 2010), the Commission's ALJ granted the applicant's motion to dismiss a protest for lack of standing, finding that the protestant, a call or demand taxi service, had no standing because it could not claim any discernable adverse affect from the granting of authority to the applicant, a paratransit service. The ALJ reasoned that because the protestant did not have authority to provide paratransit services, it could not reasonably claim that it would be harmed by the applicant entering the market. *Id.*

4. Mr. Hooven does not hold operating authority. Rather, he is merely a disgruntled customer who purports to have a negative experience with Mr. Zeffiro in his former employment with Miracle. This does not confer standing. He has no interest (much less one that is direct, immediate, or substantial) in whether Drew Moves is granted authority. Simply having moved

with Miracle Movers does not provide him with authority to be a watchdog for movers in the Pittsburgh area. To hold otherwise would invite exactly the sort of frivolous and harassing litigation that the Commission expressed an antipathy toward in *PUC v. National Fuel Gas Distribution Corp, supra*. Indeed, Mr. Hooven’s conduct—including filing two pleadings in this case and bringing an improper enforcement complaint against Mr. Zeffiro—is harassing and wasteful. The PUC should not allow members of the public to clog its dockets in this manner.

5. In case the Commission finds that Mr. Hooven has standing, Drew Moves also responds to the substantive allegations of his filing as follows:

- i. Mr. Zeffiro does not dispute that his title with Miracle Movers was “Managing Partner.” As stated in his original Petition, this does not mean that he was responsible for actions of Miracle Movers that were outside of his control.
- ii. Mr. Zeffiro’s prior filings with this Commission do not say that he intentionally used the Miracle Movers Google listing and phone number to “intercept customer inquiries and redirect them to his business.” In his response to Mr. Hooven’s enforcement complaint at Dkt. C-2025-3057902, he stated that he put his own phone number in the Miracle Movers Google listing since Miracle Movers’ number was no longer active and he was at the time the contact for issues related to Miracle Movers in Pittsburgh. Later, the he accidentally changed the name of the listing from “Miracle Movers” to “Drew Moves”, as explained in Footnote 5 of his Petition.
- iii. Mr. Hooven has attached screenshots showing that Mr. Zeffiro was attempting to recruit employees to Miracle using his personal Facebook on May 27 and 28, 2025. At that time, he was in talks with Miracle to be reemployed (something that

occurred a few days later on June 2, 2025), and he was trying to help out to be a team player. He was not advertising Miracle Movers to consumers at that time, as suggested without basis by Mr. Hooven.

iv. While Mr. Hooven may feel that his dispute with Miracle Movers is not “routine”, his Opposition is misleading for multiple reasons:

a) While the police were involved, this was due to Mr. Hooven’s harassing conduct towards Mr. Zeffiro and Drew Moves. Mr. Zeffiro called the police after Mr. Hooven created a Facebook page that falsely purported to be “Drew Moves.” Mr. Zeffiro should not be penalized for Hooven’s escalation of this dispute through extra-judicial means.

b) Mr. Zeffiro has not been named personally civil lawsuit or PUC complaint. It is undisputed that there are multiple cases against Miracle Movers.

v. Nothing in the various advertising materials cited by Mr. Hooven states that Drew Moves had operating authority. He was operating (and continues to operate) a labor-only service. Using terms like “book a move” and “relocate” are appropriate for labor-only services.

WHEREFORE, Petitioner Drew Moves, LLC respectfully request that the Commission strike Mr. Hooven’s Opposition to his Petition for lack of standing.

Dated: December 29, 2025
Respectfully Submitted,

/s/Andrew J. Horowitz, Esq.

Andrew J. Horowitz, Esq.

Pa. ID No. 311949

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VERIFICATION

I, Andrew Zeffiro, 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).

Neither I nor Drew Moves, LLC are now engaged in intrastate transportation of property or passengers for compensation in this Commonwealth except as authorized by the Pennsylvania Public Utility Commission certificate or permit, and will not engage in the transportation for which approval is herein sought, unless and until the transportation is authorized by your Honorable Commission.

Dated: 12/29/2025

Signed by:

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ANDREW ZEFFIRO