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April 1, 2026

**Via Electronic Filing**

Matthew Homsher, Secretary  
PA Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Re: Petition of Franklin Storage LP for Reinstatement of Operating Authority and Request for Expedited Treatment  
Docket No. A-2011-2243351

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Dear Secretary Homsher:

Enclosed for electronic filing please find the Petition of Franklin Storage LP for Reinstatement of Operating Authority and Request for **Expedited Treatment** with regard to the above-referenced matter.

Sincerely,



Bryce R. Beard

BRB/red  
Enclosures

cc: Office of Special Assistants (via email [ra-osa@pa.gov](mailto:ra-osa@pa.gov))  
Kim Hafner, Director, Office of Special Assistants (via email)  
Paul Diskin, Director, Bureau of Technical Utility Services (via email)  
Rod Bender, Manager, Motor Carrier Compliance Office (via email)  
Tatjana Roth, Motor Carrier Compliance Chief (via email)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Franklin Storage LP for :  
Reinstatement of Operating Authority and : Docket No. A-2011-2243351  
Request for Expedited Treatment :

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**PETITION OF FRANKLIN STORAGE LP FOR REINSTATEMENT OF OPERATING  
AUTHORITY AND REQUEST FOR EXPEDITED TREATMENT**

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Pursuant to 52 Pa. Code § 5.41, Franklin Storage LP (“Franklin Storage”) (Utility Code 8913573) files this Petition for Reinstatement of Operating Authority and Request for Expedited Treatment seeking the Pennsylvania Public Utility Commission (“Commission” or “PUC”) to reinstate Franklin Storage’s Certificate of Public Convenience for Motor Common Carrier of Property which was canceled by Secretarial Letter on March 26, 2026. As discussed below, Franklin Storage respectfully requests **expedited treatment** of this Petition based on (i) the administrative nature of the oversight that resulted in the failure of Franklin Storage’s insurer to timely submit Form E, (ii) the brief interval between the cancellation of its operating authority and the filing of this Petition (i.e. four (4) business days); and (iii) the fact that Franklin Storage has already submitted the required Form E to the Commission as of March 31, 2026.<sup>1</sup> In support hereof, Franklin Storage avers as follows:

**I. BACKGROUND**

1. Franklin Storage is a Pennsylvania-based common carrier headquartered in Chambersburg, Pennsylvania, engaged in the transportation of property, excluding household

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<sup>1</sup> The Form E was rejected by the Commission for the reason that “MC must reapply for authority.; Motor carrier does not have authority to operate in the state.” Franklin Storage will, upon grant of this petition and reinstatement, immediately resubmit its Form E if necessary.

goods in use, between points within the Commonwealth. Franklin Storage is a member of the Franklin Logistics & Development group,<sup>2</sup> which provides a comprehensive range of property carrier services, including van services for smaller or localized shipments and flatbed services for high-volume transportation.

2. Franklin Storage was issued a Certificate of Public Convenience (“CPC”) by the Commission to provide property carrier service on June 21, 2011. *See* Docket No. A-2011-2243351.

3. On January 29, 2026, the Commission issued a Tentative Order at Docket No. M-2026-3059643 regarding the Cancellation of Certificates of Public Convenience for Motor Carriers; Failure to Maintain Evidence of Insurance. Of approximately 95 carriers, Franklin Storage was one of the carriers identified in Appendix A.

4. Due to an administrative oversight, Franklin Storage’s insurer did not timely submit a Form E to the Commission. Franklin Storage transitioned to a new insurance provider effective December 1, 2025, and although coverage remained in full force without interruption, the new provider did not timely submit the required Form E evidencing such coverage.

5. Notwithstanding the administrative oversight in the submission of Form E, Franklin Storage has continuously maintained the required level of insurance coverage since its seamless transition to a new insurance provider effective December 1, 2025.

6. On March 26, 2026, the Commission issued a Secretarial Letter at Docket No. A-2011-2243351, canceling Franklin Storage’s Certificate of Public Convenience pursuant to the January 29, 2026 Order.

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<sup>2</sup> Franklin Logistics operates over 2 million square feet of warehousing in 6 locations with 125 staff employed locally. See <https://franklinlogistics.com/>.

7. Upon receipt of the Commission's March 26, 2026 notice, Franklin Storage immediately contacted its insurance provider who submitted the Form E to the Commission on March 31, 2026, evidencing continuous insurance coverage dating back to December 1, 2025.

8. However, the Commission rejected the Form E on the ground that Franklin Storage's operating authority had been canceled and that the motor carrier therefore lacked authority to operate in the Commonwealth.

9. Additionally, Franklin Storage has implemented enhanced internal controls to confirm the timely submission of Form E filings by its insurance provider and to ensure appropriate oversight of such matters going forward.

## **II. APPLICABLE LEGAL STANDARDS**

10. Section 5.41 of the Commission's regulations authorizes utilities to file petitions including Petitions for Reinstatement of Operating Authority. 52 Pa. Code § 5.41.

11. 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 *Cancellation of Certificate of Public Convenience of New Beginnings Moving & Hauling LLC*, Docket No. A-2022-303621 et al., Opinion and Order at 4-5 (Order entered Sept. 21, 2023) (internal citations omitted).

### **III. BASIS FOR RELIEF AND EXPEDITED TREATMENT**

12. This Petition plainly satisfies the Commission's five-factor test for reinstatement of operating authority and warrants expedited relief.

13. With respect to Factor 1, only four (4) business days elapsed between the Commission's March 26, 2026 cancellation notice and the filing of this Petition, demonstrating Franklin Storage's prompt and diligent response.

14. Regarding Factor 2, Franklin Storage has no history of violations of the Public Utility Code or the Commission's regulations.

15. As to Factor 3, the cancellation of Franklin Storage's Certificate of Public Convenience resulted from an administrative error in the submission of Form E. Notwithstanding this oversight, Franklin Storage continuously maintained insurance coverage fully compliant with the Commission's requirements as evidenced by the Form E submitted to the Commission on March 31, 2026.

16. With respect to Factor 4, Franklin Storage has implemented enhanced internal controls to ensure the timely submission of Form E filings by its insurance provider and to prevent any recurrence of this issue.

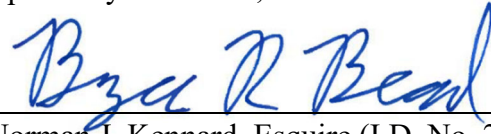
17. Finally, as to Factor 5, Franklin Storage avers that it has no outstanding civil penalties or unpaid assessments.

18. Based on the above factors and the totality of the circumstances, Franklin Storage requests the reinstatement of its Certificate of Public Convenience on an expedited basis.

**VI. CONCLUSION**

**WHEREFORE**, Franklin Storage LP respectfully requests that the Pennsylvania Public Utility Commission: (a) reinstate Franklin Storage LP's Certificate of Public Convenience at A-2011-2243351 on an expedited basis; and (b) grant any other relief in the public interest.

Respectfully submitted,



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Date: April 1, 2026

*Counsel for Franklin Storage LP*

