

BEFORE THE PENNSYLVANIA PUBLIC UTILITIES COMMISSION

A-2025-3058207

**APPLICANT DREW MOVES LLC'S MOTION TO DISMISS PROTEST OF DANIEL
HOOVEN**

Applicant Drew Moves, LLC t/a Drew Moves (“Drew Moves”) hereby moves to dismiss the Protest of Daniel Hooven and states as follows:

1. Complainant, 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. Miracle has ceased operating in Pennsylvania, but has not filed a discontinuance of its operating authority.¹

2. Mr. Hooven has never been a customer of Drew Moves, LLC. His Protest states that his interest in this proceeding is as follows:

I currently have a 2 formal PUC complaints open against Andrew Zeffiro, C-2025-3056319 and C-2025-3057902. Complaint 3056319 is due to his time as the Managing Partner of Miracle Movers Pittsburgh and includes consumer threats, deceptive advertising, and third-party vehicles among other concerns. Complaint 3057902 involves Drew Moves LLC, for advertising and soliciting [sic] new business without proper PUC or FMCSA authorization or insurance.

3. To the extent that the above complaints pertain to Drew Moves, they have been dismissed. To the extent that they pertain to Miracle Movers, that is not the carrier at issue here.

4. Mr. Hooven does not attach his operating authority to his protest as required by 52 Pa. Code § 3.381(c)(1)(i)(A) because he is not a mover and has no operating authority.

5. Rather, he is transparent that he has a vendetta against Mr. Zeffiro, feels that Mr. Zeffiro is not fit to operate, believes that he has evidence that Mr. Zeffiro is providing household

¹ Mr. Zeffiro does not have the authority to file a discontinuance on behalf of Miracle. Undersigned counsel has offered to file a discontinuance for Miracle at no charge, but received no response from Miracle.

goods moving services without operating authority, and requests that the Commission deny his application for operating authority.

6. Mr. Hooven lacks standing since he does not hold operating authority and is not a customer of Drew Moves.

7. 52 Pa. Code § 3.381(c)(1)(i)(B) treats a protest to a new mover applicant as a petition for intervention (“[u]pon the filing of a timely protest, the protestant will be allowed to participate in the proceeding as a party intervenor”).

8. 52 Pa. Code § 5.72(a) sets forth the criteria for a person such as Mr. Hooven to be eligible to intervene in a PUC proceeding:

(a) Persons. A petition to intervene may be filed by a person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate to the administration of the statute under which the proceeding is brought. The right or interest may be one of the following:

(1) A right conferred by statute of the United States or of the Commonwealth.

(2) An interest which may be directly affected and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding.

(3) Another interest of such nature that participation of the petitioner may be in the public interest.

9. Subsections (1) and (2) do not apply because Mr. Hooven has no statutory right to bring this protest and he will not be directly affected because he will not be required to use Drew Moves in the future and will therefore not be bound by the outcome of this proceeding. This inquiry therefore turns on subsection (3), whether his participation is in the public interest. It is not.

10. 52 Pa. Code § 3.381(c)(1)(i)(A) requires that protestants have operating authority because it is not necessary for potential consumers such as Mr. Hooven to have protest rights. Instead, it is the job of the Commission to vet applicants and determine if they meet the

requirements to be granted operating authority. *See Swift & Choi Dev., LLC v. Pa. PUC*, 247 A.3d 1198 (Pa. Commw. Ct. 2021) (affirming the PUC’s finding that an intervenor did not have standing because the public interest was adequately represented by other parties). In this case, the Commission is well-equipped to evaluate the merits of Drew Moves’ application without the aid of Mr. Hooven.

WHEREFORE, Petitioner Drew Moves, LLC respectfully request that the Commission dismiss the Protest of Daniel Hooven.

Dated: April 21, 2026

Respectfully Submitted,

/s/Andrew J. Horowitz, Esq.
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Counsel for Applicant

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).

Dated: 4/21/2026

Signed by:

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ANDREW ZEFFIRO