

**Bunnell Waste Removal**

**267 Tryon Street**

**Honesdale, PA 18431**

**[Info@BunnellWasteRemoval.com](mailto:Info@BunnellWasteRemoval.com)**

**570-253-5082**

**April 16<sup>th</sup> 2026**

**To**

**Matthew L. Homsher, Secretary**

**Pennsylvania Public Utility Commission**

**Commonwealth Keystone Building**

**400 North Street**

**Harrisburg, PA 17120**

**Comment and Challenge to Tentative Order**

Docket No. M-2026-3061024

Bunnell Waste Removal

Utility Code – 705757

Bunnell Waste Removal respectfully submits these Formal Exceptions and Comments to the Tentative Order entered in the above-referenced proceeding.

On behalf of Bunnell Waste Removal, holding Certificate of Public Convenience (CPC) for utility code – 705757, to formally dispute the cancellation of our CPC as notified in your letter dated 4/16/26.

- **Bunnell Waste Removal** is engaged in the business of transporting municipal waste for customers for compensation within Pennsylvania. As a for-hire waste hauler operating intrastate, our services fall under the regulatory jurisdiction of the Pennsylvania Public Utility Commission.
- **52 Pa. Code § 41.16** is a regulation issued by the Pennsylvania Public Utility Commission (PUC) that defines the scope of exemptions from Commission jurisdiction for certain waste transportation services. It delineates which haulers of waste materials are excluded from the requirements that typically apply to common carriers or contract carriers of property.
- **Exemption Based on Revenue:** The Company's reported revenue reflects a good-faith interpretation of applicable Commission guidance, including 52 Pa. Code § 41.16, which provides that the transportation of municipal waste for disposal is not considered the transportation of "property" for purposes of Commission jurisdiction. Based on this distinction, the Company reasonably understood that revenue derived solely from the hauling of municipal waste for disposal differs from traditional regulated carrier revenue involving the transportation of property.
- **Impact of Cancellation of Certificate of Public Convenience:** Such cancellation would negatively impact the communities served by Bunnell Waste Removal. The Company provides regular waste collection services to residential and commercial customers, and the sudden loss of service would create unnecessary hardship, potential service gaps, and public health concerns if waste collection is interrupted.

We kindly request that the Public Utilities Commission reconsider its decision to cancel our CPC, given our revenue exemption status and the lack of any material violations on our part.

Please do not hesitate to contact us at 570-253-5082 or [Info@BunnellWasteRemoval.com](mailto:Info@BunnellWasteRemoval.com) should you require any further information or documentation.

We appreciate your prompt attention to this matter and look forward to resolving this issue in a timely manner.

Sincerely,

Bunnell Waste Removal