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June 4, 2026

VIA ELECTRONIC FILING

Matthew L. Homsher
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

RE: Application of Premier Movers LLC; Docket No. A-2026-3062522; **PETITION
FOR RECONSIDERATION OF ACTIONS OF COMMISSION STAFF**

Dear Secretary Homsher:

Enclosed for filing with the Pennsylvania Public Utility Commission is the Petition for Reconsideration of Actions of Commission Staff in the above-captioned docket.

Thank you for your attention to this matter. If you have any questions related to this filing, please do not hesitate to contact my office.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Todd S. Stewart", is written over a horizontal line.

Todd S. Stewart
Counsel for Premier Movers LLC

TSS/jld
Enclosure

2. Later, in a letter dated December 7, 2022, at Docket A-2022-3036979, the Applicant was denied authority due to its propensity to operate illegally (as thoroughly described and outlined in the original denial). Upon Petition for Reconsideration of the denial, the Applicant was denied relief due to its inability to submit a petition which complied with the Commission's timeliness requirement.

3. On January 26, 2023, at Docket A-2023-3037691, the Applicant was afforded an opportunity to establish a certificated presence with the Commission by approving it to provide Property transportation; however, by July 13, 2023, the Applicant found itself cancelled of authority and its vehicle registrations suspended for failure to comply with Commission regulations (M-2023-3040348).

4. Finally, on October 31, 2023, at Docket A-2023-3043747, the Applicant was denied authority due to its documented propensity to operate illegally. Upon the Applicant's Petition for Relief from Staff Action, the denial was affirmed. The Applicant's previous history remains relevant, and we find that Premier has not satisfied the operational fitness requirement pursuant to 52 Pa. Code § 41.14(5).

In Response to No. 1., while Premier did misunderstand the Commission's requirements and failed to hire counsel to assist, its failure to provide additional information to the Commission does not rise to the level of illegal activity as the Staff letter alleges. It may demonstrate an unrepresented individual's frustration with the application system, but it is not contrary to law or regulation.

The same applies to No. 2. The Applicant was denied a review of the denial of its application due to a failure to timely exercise its right to appeal. Again this action may have been contrary to the Applicant's interest, but it is not an indication of any propensity to operate illegally. No rule or regulation was alleged to have been violated or proven.

Paragraph No. 3 concerns the application for carrying property that was denied because the Applicant, after receiving conditional approval, failed to provide proof of insurance. Again, no affirmative violation of Commission regulations, and the Application was denied and the conditional approval rescinded.

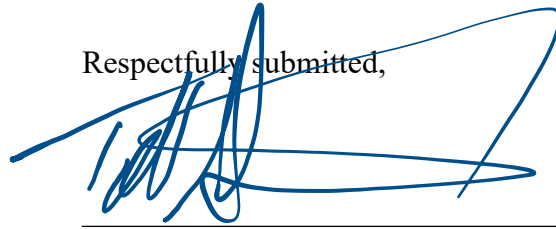
Paragraph No. 4 is the only allegation that involved actual an actual violation, and Applicant paid a fine and offered no excuse for its actions. Since that time, and despite several attempts by Commission Staff to affirmatively lure Premier into violations though “sting” operations, Premier has not engaged in any such conduct apart from that singular incident. That is not to suggest that operating without authority is not a serious issue, but there must be some reasonable basis for Premier to get past that violation and obtain certification; or the ban is a life sentence, which far exceeds the weight of the incident for which Premier has already been punished.

Premier has continued to operate on an interstate basis and has executed hundreds of interstate moves without complaint. In other words, there is evidence that Premier has operated legally, albeit under a US DOT permit, for many years, evidence that evidence was not even considered in the Staff denial.

Premier does not expect the Commission to reverse the Staff determination and grant its application outright, and that is not the relief it seeks. Rather, Premier believes that at a minimum it deserves the ability to have its Application considered on its merits, like any other applicant, and to be given a chance to show that it indeed has a propensity to operate legally.

WHEREFORE, Petitioner, Premier Movers LLC respectfully request that the Commission reverse the action of Staff and require Sstaff to give full consideration of Premier’s application on its merits with all due process that is required.

Respectfully submitted,



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Counsel for Premier Movers LLC

DATED: June 4, 2026

VERIFICATION

I, Arthur Martella, Owner of Premier Movers LLC, hereby state that the facts set forth in the foregoing documents 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).

Date: 6/5/2026

Signature: Art Martella