

**PENNSYLVANIA  
PUBLIC UTILITY COMMISSION  
Harrisburg, PA 17120**

Public Meeting held June 18, 2026

Commissioners Present:

Stephen M. DeFrank, Chairman  
Kimberly Barrow, Vice Chair  
Kathryn L. Zerfuss  
John F. Coleman, Jr.  
Ralph V. Yanora

Application of God's Grace Medical Transportation LLC

A-2025-3059525

**OPINION AND ORDER**

**BY THE COMMISSION:**

Before the Pennsylvania Public Utility Commission (Commission) for consideration and disposition is a Petition for Reconsideration from Staff Action (Petition), filed by God's Grace Medical Transportation LLC (Applicant or God's Grace) on March 4, 2026, relative to the above-captioned proceeding.<sup>1</sup> The Secretarial Letter to which the Petition refers was issued on February 17, 2026 (*February 2026 Secretarial*

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<sup>1</sup> According to the Pennsylvania Department of State (PA DOS), the Applicant's registered legal name is "God's Grace Medical Transportation."

*Letter*).<sup>2</sup> No Answer to the Petition has been filed. For the reasons that follow, we shall deny the Petition, consistent with this Opinion and Order.

## I. History of Proceeding

On December 30, 2025, God’s Grace filed an Application for Motor Common Carrier of Persons in Paratransit Service (Application) with the Commission.<sup>3</sup> In its Application, God’s Grace sought authority to provide paratransit services between points in Pennsylvania “to transport, as a common carrier, by motor vehicle, persons in paratransit service, in the counties of Cumberland, Dauphin, Lancaster and York subject to the following restriction: Issue under authority of 52 Pa. Code Section 23.42.” Application at 1-3. Included with the Application was a dated Statement of Financial Position (Balance Sheet), wherein the Applicant indicated: (1) a total cash balance of \$5,000; (2) total assets of \$13,000, including all current and tangible assets; and (3) total liabilities of \$1,900. Application at 8.

On January 6, 2026, the Commission’s Bureau of Technical Utility Services (TUS) issued a Data Request (Data Request), wherein TUS notified God’s Grace that additional information was required within ten (10) working days of the date on the letter accompanying the Data Request, in order for TUS to proceed with the Application. Further, the Data Request instructed God’s Grace that its responses must include a signed verification with an original signature, pursuant to 52 Pa. Code § 1.36,

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<sup>2</sup> Because the Petition challenges the action taken in the *February 2026 Secretarial Letter* and was filed within twenty (20) days of the issuance of the *February 2026 Secretarial Letter*, we shall regard the Petition as a Petition for Reconsideration from Staff Action, pursuant to 52 Pa. Code § 5.44(a).

<sup>3</sup> We note that the Verification of Application and Verified Statement of Applicant included in the Application was signed by Mr. Rufus Abiona, identified as the administrator of God’s Grace. Application at 4, 7.

and supplied a sample Verification. Data Request at 1-2. Additionally, the Data Request stated the following:

1. Before your application can be processed further, you are required to provide an acceptable description of the proposed service area. Your request should be limited to a scope which can be supported by your present resources and financial position. As your business grows, additional territories and rights may be applied for. Applicants who request service areas beyond the scope of their resources risk the outright denial of their application, or possible Commission dictated revisions to their original request.

Your proposed service area must be fully bound, and easily discernible. This may be achieved by the use of municipal boundaries, roads, railroads, or natural boundaries such as rivers and streams, etc.

**YOU SHOULD ONLY SPECIFY AREAS FROM WHICH YOU WISH TO ORIGINATE SERVICE.**

Example:

- a. Between points in Pennsylvania
  - b. between points in the counties of X, Y, and Z.
  - c. from points in the counties of X, Y, and Z, to points in Pennsylvania, and return.
  - d. from points in the counties of X, Y, and Z, to points in the counties of A, B, and C, and return
2. Your response to question #4 of the verified statements is not optional. Provide a complete response which addresses EACH portion of the question.
  3. Your response to question #5 of the verified statements is incomplete. Provide a complete response which addresses EACH portion of the question.

Be advised that your policy must specifically address the following sections of 52 Pa Code:

- § 29.503. Driver age.
  - § 29.504. Driver history. (frequency and record retention)
  - § 29.505. Criminal history. (frequency and record retention)
4. Your response to question #6 of the verified statements is not optional. Provide a complete response which addresses EACH portion of the question.
  5. You indicate regular maintenance will be performed but mention nothing about pre and post trip vehicle inspections. Can you please explain your policy? Will daily inspections not be performed prior to placing the vehicle into service each day? If so, what will those inspections entail? If not, why not?
  6. What is your projected annual cost for commercial insurance coverage? Please provide evidence of actual insurance quotes seeking coverage for your intended vehicle. Please, **at a minimum**, include the coverage amounts, the vehicle model, policy terms, and annual/monthly premiums.
  7. Please review the below criteria and, if necessary, submit a revised compliant Statement of Financial Position (**if corrections are required**) and the evidence to support the statement of financial position (**the evidence is mandatory regardless of revisions being necessary**):
    - a. The statement presented must be **DATED** and **comprised of information which is less than 6 months old.**
    - b. The submission **MUST** be comprised of **information which is accurate as of the date provided.**

- c. **The information is to be exact and should not include estimates or approximations when accurate numbers are available.** Property and vehicle valuations may be approximations; however, if the valuation is higher than typical Kelly Blue Book (or similar) valuations, you should provide an explanation as to why (e.g. vehicle with an installed wheelchair lift, etc). Bank accounts and loan balances should be exact amounts (rounded to the nearest dollar).
  
- d. **ALL** relevant **assets and debts** are to be included (**vehicle loan balances/vehicle asset value, lease expenses, etc.**). *For example, your submitted bank statement indicates a loan payment on a Chase card, but this is not accounted for on the balance sheet.*
  
- e. **The information provided is also to be strictly limited to assets and debts HELD BY THE APPLICANT (GOD’S GRACE MEDICAL TRANSPORTATION LLC), and not the individual member(s).** Any property and accounts listed **MUST** be registered or titled to the corporation. Bank accounts must be in the name of **GOD’S GRACE MEDICAL TRANSPORTATION LLC**. Vehicles must be registered to **GOD’S GRACE MEDICAL TRANSPORTATION LLC**. Property must be titled to **GOD’S GRACE MEDICAL TRANSPORTATION LLC**. If these items are not in the name of **GOD’S GRACE MEDICAL TRANSPORTATION LLC**, should **NOT** be included on the balance sheet.

If you have not fully funded and equipped the business, now is the time to do so (before re-submitting your corrections). Applicants lacking suitable finances, resources, and equipment will be denied authority.

**Finally, in order to fully assist the Commission in verifying your financial fitness**, please provide supporting documentation for the statement of financial position (balance sheet). Acceptable means of support include current copies of bank statements (account numbers may be redacted), and notarized/official statements of account balances/ownership provided by bank officers (with current contact information). *Any and all claimed vehicles or land/buildings must also include proof of ownership/registration - vehicle registrations, leases, property titles, purchase agreements, etc.*

**You are encouraged to enlist professional financial assistance if you experience difficulty in constructing your statement of financial position. Be advised that failing to provide an acceptable financial statement is sufficient grounds for the denial of your application.**

In a Footnote: The Data Request also noted:

**The purpose of the verified statement questions is to determine your ability to provide safe, efficient, and reasonable transportation. It is in your best interest to provide accurate, complete, and timely responses. Failure to do so is sufficient grounds to justify the denial of your application because YOU have failed to provide sufficient evidence of your fitness to operate. Be advised that additional corrections may not always be requested; therefore, prior to submitting your responses, your consultation with an attorney or financial expert familiar with Commission regulated Motor Carrier related proceedings is highly encouraged.**

Data Request at 2-4.

On January 14, 2026, the Applicant filed an “Additional Information Response” which included, *inter alia*, responses to the Data Request concerning the

Applicant's facility, record maintenance plan, and communication network, the number of employees and their job descriptions; the number of drivers it plans to employ, and the background checks it will perform.

On February 17, 2026, the Commission issued the *February 2026 Secretarial Letter*, wherein it dismissed the Application. In pertinent part, the *February 2026 Secretarial Letter* stated, as follows:

\* \* \*

On December 30, 2026, the applicant submitted an application for paratransit authority. On January 6, 2026, the application was reviewed and deficiencies were noted. On the same day the applicant was issued a 10-day data request seeking corrections or clarifications for a multitude of issues related to its proposed operating territory, its facilities, its hiring/retention policies, its driver/territory suitability, its insurance due diligence, and financial fitness. The Commission's request included reference citations and examples of acceptable forms of evidence.

On January 15, 2026, the applicant submitted a revised application and a response which failed to provide policies compliant with 52 Pa Code § 29.504, failed to provide evidence of acceptable safety/maintenance policies, failed to provide insurance related information, failed to provide evidence supporting the claimed financial position, and failed to provide evidence verifying the possession and ownership of the claimed vehicle assets. Absent the requested evidence it is not possible for the Commission to determine that applicant's continued ability to offer safe, efficient, and reasonable transportation under the proposed new ownership.

**For these reasons the application is DISMISSED and DENIED.**

*February 2026 Secretarial Letter* at 1 (emphasis in original).

Additionally, the *February 2026 Secretarial Letter* informed God's Grace that, if it disagreed with the Commission's determination, then it may submit a Petition for Reconsideration from Staff Action with the Commission's Secretary within twenty days of the date of the *February 2026 Secretarial Letter*. Further, the *February 2026 Secretarial Letter* outlined instructions regarding the form and content of such a Petition for Reconsideration from Staff Action, including references to the inclusion of relevant documentation and a signed verification statement, as set forth in 52 Pa. Code §§ 1.31 and 5.44. *February 2026 Secretarial Letter* at 2.

As noted, *supra*, on March 4, 2026, God's Grace timely filed the instant Petition. No response to the Petition has been filed.

## **II. Discussion**

### **A. Legal Standards**

Petitions for Reconsideration from Staff Action are governed by the Commission's Rules of Administrative Practice and Procedure, 52 Pa. Code § 5.44(a), which provides the following:

Actions taken by staff, other than a presiding officer, under authority delegated by the Commission, will be deemed to be the final action of the Commission unless reconsideration is sought from the Commission within 20 days after service of notice of the action, unless a different time period is specified in this chapter or in the act.

52 Pa. Code § 5.44(a).

When evaluating appeals from a Commission staff action, under 52 Pa. Code §§ 5.44, the applicable legal standard is that the moving party has the burden

of proof. *See, e.g., Application of Airquest*, Docket No. A-2015-2493073 (Order entered December 8, 2016) (*Application of Airquest*) (request for reconsideration of Secretarial Letter denying application for failure to comply with conditions); *Application of Department of Transportation (Norfolk)*, Docket No. A-2018-3003795 (Order entered November 14, 2019) (request for reconsideration of Secretarial Letter approving application with conditions). In this proceeding, God's Grace is the party seeking affirmative relief from the Commission. Therefore, God's Grace is the party with the burden of proof.

In order to make the determination whether granting a certificate is necessary or proper for the service, accommodation, convenience or safety of the public, the Commission's Regulations, at 52 Pa. Code §§ 3.381-85, and the Commission's Policy Statement, at 52 Pa. Code § 41.14, establish the evidentiary guidelines and criteria to be examined by the Commission when considering whether to grant or deny an application for authority.

The Commission's Policy Statement at 52 Pa. Code § 41.14 provides as follows:

§ 41.14. Evidentiary criteria used to decide motor common carrier applications – statement of policy.

An applicant seeking motor common carrier authority has the burden of demonstrating that it possesses the technical and financial ability to provide the proposed service. In addition, authority may be withheld if the record demonstrates that the applicant lacks a propensity to operate safely and legally. In evaluating whether a motor carrier applicant can satisfy these fitness standards, the Commission will ordinarily examine the following factors, when applicable:

- (1) Whether an applicant has sufficient capital, equipment, facilities and other resources necessary to serve the territory requested.

(2) Whether an applicant and its employees have sufficient technical expertise and experience to serve the territory requested.

(3) Whether an applicant has or is able to secure sufficient and continuous insurance coverage for all vehicles to be used or useful in the provision of service to the public.

(4) Whether an applicant has an appropriate plan to comply with the Commission's driver and vehicle safety regulations and service standards in Chapter 29 (relating to motor carriers of passengers).

(5) An applicant's record, if any, of compliance with 66 Pa. C.S. (relating to Public Utility Code), this title and the Commission's orders.

(6) Whether an applicant or its drivers have been convicted of a felony crime of moral turpitude and remains subject to supervision by a court or correctional institution.

52 Pa. Code § 41.14.

Finally, pursuant to Section 1103(a) of the Public Utility Code, 66 Pa.C.S. § 1103(a), an application for a certificate of public convenience should be granted only if the Commission finds that "the granting of such certificate is necessary or proper for the service, accommodation, convenience or safety of the public." 66 Pa.C.S. § 1103(a).

## **B. God's Grace's Petition**

In the one-page Petition, the Applicant respectfully requests reconsideration of the Commission's decision. The Petition includes a verification statement signed by Mr. Abiona. Petition at 1.

### C. Disposition

In considering the instant Petition, we note that we are not required to consider, expressly or at length, each and every contention raised by a party to our proceedings. *University of Pennsylvania v. Pa. PUC*, 485 A.2d 1217 (Pa. Cmwlth. 1984). Any argument that is not specifically addressed herein shall be deemed to have been duly considered and denied without further discussion.

Upon our review of the Petition and the record documents, we shall deny the Petition. As discussed, *supra*, the *February 2026 Secretarial Letter* denied the Application because God's Grace failed to establish fitness to operate, pursuant to the Commission's Regulations, 52 Pa. Code § 41.14(1).

Our review of the Applicant's Petition concludes with the determination that God's Grace has failed to demonstrate that it has addressed the deficiencies identified in the *February 2026 Secretarial Letter*. Although God's Grace submitted additional information that was received by the Commission on January 14, 2026, more than a month before the *February 2026 Secretarial Letter*, the Commission found that the information was deficient, and thus denied and dismissed the Application. In its Petition, God's Grace has not offered any information to address the omitted information that the *February 2026 Secretarial Letter* outlined, as noted above.

Based on our review of the Petition, the record, and the applicable law, we find that the Applicant has not provided sufficient information to rescind the *February 2026 Secretarial Letter*. Accordingly, we shall deny God's Grace's Petition and uphold the *February 2026 Secretarial Letter* for failure of the Applicant to comply with a Commission data request, consistent with this Opinion and Order. However, we note that the Applicant may file a new application with the Commission if it so chooses.

### III. Conclusion


For the reasons discussed herein, we will deny the Petition and uphold the *February 2026 Secretarial Letter*, consistent with this Opinion and Order;

**THEREFORE,**

#### **IT IS ORDERED:**

1. That the Petition for Reconsideration from Staff Action, filed by God's Grace Medical Transportation LLC on March 4, 2026, at Docket No. A-2025-3059525, is denied, consistent with this Opinion and Order.
2. That the proceeding at Docket No. A-2025-3059525 be marked closed.

**BY THE COMMISSION,**



Matthew L. Homsher  
Secretary

(SEAL)

ORDER ADOPTED: June 18, 2026

ORDER ENTERED: June 18, 2026