



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE  
REFER TO OUR FILE

February 22, 2016

**Via E-Filing**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Re: Pennsylvania Public Utility Commission, Bureau of Investigation and  
Enforcement v. Bushkill Group Inc.  
Docket No. C-2015-2512950  
**Joint Motion for Continuance**

Dear Secretary Chiavetta:

Enclosed for electronic filing is the Joint Motion for Continuance on behalf of the Bureau of Investigation and Enforcement of the Pennsylvania Public Utility Commission and Bushkill Group, Inc. in the above-captioned matter.

Copies have been served on the parties of record in accordance with the Certificate of Service.

Sincerely,

Stephanie M. Wimer  
Prosecutor

Enclosure

cc: Honorable Dennis J. Buckley  
As per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission, :  
Bureau of Investigation and Enforcement :  
 :  
v. : C-2015-2512950  
 :  
Bushkill Group, Inc. :

**JOINT MOTION FOR CONTINUANCE**

AND NOW comes the Pennsylvania Public Utility Commission's (Commission) Bureau of Investigation and Enforcement (I&E), Complainant in the above-captioned matter, and Bushkill Group, Inc. (Bushkill), Respondent in the above-captioned matter, and file this Joint Motion for Continuance of the Initial Hearing scheduled for February 26, 2016 pursuant to Section 1.15(b) of the Commission's regulations, 52 Pa. Code § 1.15(b). In support thereof, I&E and Bushkill aver as follows:

1. On November 15, 2015, I&E filed a Formal Complaint (Complaint) against Bushkill alleging violations of the Gas and Hazardous Liquids Pipeline Act, 58 P.S. §§ 801.101, *et seq.* (Pipeline Act or Act 127).
2. On December 16, 2015, Bushkill filed Preliminary Objections, which seek dismissal of the Complaint.<sup>1</sup>
3. On January 7, 2016, I&E filed an Answer to the Preliminary Objections of Bushkill and requested that the Preliminary Objections be dismissed and I&E's Complaint be sustained.<sup>2</sup>

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<sup>1</sup> By Secretarial Letter dated November 25, 2015 in the above-captioned proceeding, Bushkill was granted an extension of time until December 16, 2015 to file any pleadings in response to the Complaint.

<sup>2</sup> By Secretarial Letter dated December 22, 2015 in the above-captioned proceeding, I&E was granted an extension of time until January 7, 2016 to file its response to Bushkill's Preliminary Objections.

4. By Hearing Notice dated January 27, 2016, an Initial Hearing is scheduled in this matter for Friday, February 26, 2016 at 10:00 AM in Harrisburg, PA before Administrative Law Judge (ALJ) Dennis J. Buckley.

5. The parties deem an Initial Hearing to be premature since a ruling regarding Bushkill's Preliminary Objections and I&E's Answer thereto has not been issued, and no Answer to I&E's Complaint has yet been filed.<sup>3</sup>

6. Accordingly, I&E and Bushkill respectfully request a continuance of the Initial Hearing in the above-captioned matter.

WHEREFORE, the Pennsylvania Public Utility Commission's Bureau of Investigation and Enforcement and the Bushkill Group, Inc. respectfully request that the Initial Hearing scheduled for February 26, 2016 in the above captioned-matter be continued.

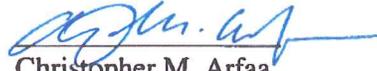
Respectfully Submitted,



Stephanie M. Wimer  
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Dated: February 22, 2016

<sup>3</sup> Since one of Bushkill's Preliminary Objections asserts insufficient specificity in the Complaint, an answer is not required until further directed by the presiding officer or the Commission. 52 Pa. Code § 5.101(e)(1).

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

Service by First Class Mail and Electronic Mail:

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Dated: February 22, 2016