

August 22, 2016

Via Electronic Filing

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

In re: Dockets Nos. C-2016-2551544, C-2016-2558244 and C-2016-2559741
Ross E. Schell v. Suez Water Pennsylvania Inc.

Dear Secretary Chiavetta:

We are counsel to Suez Water Pennsylvania Inc. in the above referenced matters and are submitting via electronic filing its Motion to Continue, Consolidate and Reschedule the Hearing presently scheduled for September 1, 2016 at C-2016-2551544. A copy of the Motion is being served upon Mr. Schell by electronic and first class mail as set forth on the certificate of service attached to the Motion.

Very truly yours,

THOMAS, NIESEN & THOMAS, LLC

By 

Thomas T. Niesen

Enclosure

cc: Certificate of Service (w/encl.)
Judith A. McCoy Jordan (via email, w/encl.)

160822-Chiavetta (Motion to Cancel and Reschedule).wpd

**Before The
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ROSS E. SCHELL,	:	
Complainant	:	
	:	Docket No. C-2016-2551544
v.	:	Docket No. C-2016-2558244
	:	Docket No. C-2016-2559741
SUEZ WATER PENNSYLVANIA INC.,	:	
Respondent	:	

NOTICE

PURSUANT TO 52 PA CODE SECTION 5.103(b), NOTICE IS HEREBY GIVEN THAT A RESPONSIVE PLEADING TO THE FOLLOWING MOTION TO CONTINUE, CONSOLIDATE AND RESCHEDULE HEARING SHALL BE FILED WITHIN 20 DAYS OF THE DATE OF SERVICE.

DATE OF SERVICE: AUGUST 22, 2016.

**Before The
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ROSS E. SCHELL,	:	
Complainant	:	
	:	Docket No. C-2016-2551544
v.	:	Docket No. C-2016-2558244
	:	Docket No. C-2016-2559741
SUEZ WATER PENNSYLVANIA INC.,	:	
Respondent	:	

MOTION TO CONTINUE, CONSOLIDATE AND RESCHEDULE HEARING

AND NOW, comes Suez Water Pennsylvania Inc. (“Suez”), by its attorneys, and, pursuant to 52 Pa. Code § 5.103, moves to continue the hearing presently scheduled for September 1, 2016, at C-2016-2551544, to consolidate the proceedings at C-2016-2551544, C-2016-2558244 and C-2016-2559741 for hearing purposes and to reschedule the hearing as a Consolidated Call-In Telephonic Hearing at C-2016-2551544, C-2016-2558244 and C-2016-2559741. In support of this Motion, Suez presents as follows:

1. These proceedings concern Complaints of Ross E. Schell (“Complainant”). On or about May 26, 2016, Complainant filed a Complaint at C-2016-2551544, concerning reliability, safety or quality of water service. Suez filed an Answer to the Complaint on July 7, 2016.

2. Subsequent to the filing of the Complaint at C-2016-2551544, Complainant filed a second Complaint, on or about July 25, 2016, against Suez at C-2016-2558244 concerning the metering of his water service. Suez filed an Answer to the Complaint on August 12, 2016.

3. Subsequent to the filing of the second Complaint at C-2016-2558244, Complainant filed a third Complaint, on or about August 3, 2016, against Suez at C-2016-2559741. The third Complaint appears to have been served by the Office of the Secretary on August 4, 2016. If served on August 4, 2016, Suez has until August 24, 2016 to answer the third Complaint.

4. By Notice dated August 9, 2016, the Public Utility Commission scheduled a Call-In Telephonic Hearing in the first Complaint at C-2016-2551544 for September 1, 2016 before Administrative Law Judge Jeffrey A. Watson. As yet, no scheduling has occurred in the second or third Complaints at C-2016-2558244 and C-2016-2559741.

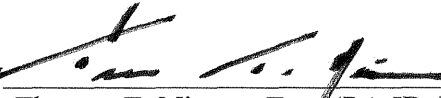
5. Suez believes it would be an efficient use of time and resources to continue the Call-In Telephonic Hearing presently scheduled for September 1, 2016, at C-2016-2551544, to consolidate the proceedings at C-2016-2551544, C-2016-2558244 and C-2016-2559741 for hearing purposes and to reschedule the hearing as a Consolidated Call-In Telephonic Hearing at C-2016-2551544, C-2016-2558244 and C-2016-2559741.

6. Counsel for Suez contacted Complainant prior to the filing of this Motion and asked him if he would have any objection to the continuation, consolidation for hearing purposes and rescheduling of the hearing. Complainant stated that he has no objection.

WHEREFORE, Suez Water Pennsylvania Inc. requests that the Pennsylvania Public Utility Commission continue the hearing presently scheduled for September 1, 2016, at C-2016-2551544, consolidate the proceedings at C-2016-2551544, C-2016-2558244 and C-2016-

2559741 for hearing purposes and reschedule the hearing as a Consolidated Call-In Telephonic Hearing at C-2016-2551544, C-2016-2558244 and C-2016-2559741.

Respectfully submitted,

By 
Thomas T. Niesen, Esq. (PA ID # 31379)
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Tel: 717-255-7600

Attorney for Respondent Suez Water Pennsylvania Inc.

DATED: August 22, 2016

Before The
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ROSS E. SCHELL,	:	
Complainant	:	
v.	:	Docket No. C-2016-2551544
	:	Docket No. C-2016-2558244
SUEZ WATER PENNSYLVANIA INC.,	:	Docket No. C-2016-2559741
Respondent	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this 22nd day of August, 2016, served a true and correct copy of the foregoing Motion to Continue, Consolidate and Reschedule Hearing, upon the persons and in the manner set forth below:

VIA ELECTRONIC AND FIRST CLASS MAIL

Ross E. Schell
203 Knollwood Drive
Harrisburg, PA 17109
rosbucs@verizon.net

VIA ELECTRONIC MAIL

The Honorable Jeffrey A. Watson
Piatt Place
Suite 220
301 5th Avenue
Pittsburgh, PA 15222
jeffwatson@pa.gov


Thomas T. Niesen (PA ID # 31379)