

September 16, 2016

Via Electronic Filing

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

In re: Docket No. C-2016-2563040
Ross E. Schell v. Suez Water Pennsylvania Inc.

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 Consolidate the proceeding at C-2016-2563040 with the already consolidated proceedings at C-2016-2551544, C-2016-2558244 and C-2016-2559741. Copies of the Motion are being served upon the persons and in the manner set forth on the certificate of service attached to it.

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.)

160915-Chiavetta (Motion to Consolidate).wpd

**Before The
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ROSS E. SCHELL,	:	Docket No. C-2016-2563040
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 CONSOLIDATE SHALL BE FILED WITHIN 20 DAYS OF THE DATE OF SERVICE.

DATE OF SERVICE: SEPTEMBER 16, 2016.

**Before The
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ROSS E. SCHELL,	:	Docket No. C-2016-2563040
Complainant	:	
	:	Docket No. C-2016-2551544
v.	:	Docket No. C-2016-2558244
	:	Docket No. C-2016-2559741
SUEZ WATER PENNSYLVANIA INC.,	:	
Respondent	:	

MOTION TO CONSOLIDATE

AND NOW, comes Suez Water Pennsylvania Inc. (“Suez”), by its attorneys, and, pursuant to 52 Pa. Code § 5.103, moves to consolidate the proceeding at C-2016-2563040 with the already consolidated proceedings 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 August 22, 2016, Complainant filed a Complaint at C-2016-2563040, expressing concern with the accuracy of his meter and claiming that it reacts to ground vibrations from passing trucks. Suez filed an Answer to the Complaint on September 12, 2016.


2. Prior to the filing of the Complaint at C-2016-2563040, Complainant filed Complaints against Suez at C-2016-2551544 concerning water quality; at C-2016-2558244 concerning the metering of his water service; and at C-2016-2559741 concerning low water pressure on August 3, 2016. Suez filed Answers to each Complaint.

3. By Interim Order Consolidating Complaints and Continuing Hearing, dated August 24, 2016, Administrative Law Judge Jeffrey A. Watson consolidated the Complaints at C-2016-2551544, C-2016-2558244 and C-2016-2559741. An Initial Call in Telephonic Hearing is scheduled for October 4, 2016.

4. Suez believes it would be an efficient use of time and resources to consolidate the proceeding at C-2016-2563040 with the already consolidated proceedings at C-2016-2551544, C-2016-2558244 and C-2016-2559741. Suez is not seeking a change in the October 4 hearing date.

WHEREFORE, Suez Water Pennsylvania Inc. requests that the Pennsylvania Public Utility Commission consolidate the proceeding at C-2016-2563040 with the proceedings at C-2016-2551544, C-2016-2558244 and C-2016-2559741.

Respectfully submitted,

By 
Thomas T. Niesen, Esq. (PA ID # 31379)
THOMAS, NIESEN & THOMAS, LLC
212 Locust Street, Suite 600
Harrisburg, PA 17101
Tel: 717-255-7600

Attorney for Respondent Suez Water Pennsylvania Inc.

DATED: September 16, 2016

Before The
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ROSS E. SCHELL,	:	Docket No. C-2016-2563040
Complainant	:	
	:	Docket No. C-2016-2551544
v.	:	Docket No. C-2016-2558244
	:	Docket No. C-2016-2559741
SUEZ WATER PENNSYLVANIA INC.,	:	
Respondent	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this 16th day of September 2016, served a true and correct copy of the foregoing Motion to Consolidate, upon the persons and in the manner set forth below:

VIA FIRST CLASS MAIL

Ross E. Schell
203 Knollwood Drive
Harrisburg, PA 17109

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


Thomas T. Niesen (PA ID # 31379)