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July 8, 2019

**Via Electronic Filing**

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

Re: William Towne v. The Pittsburgh Water and Sewer Authority  
Docket No. C-2019-3008437

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Pittsburgh Water and Sewer Authority's ("PWSA") Motion for Continuance with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,



Daniel Clearfield

DC/lww  
Enclosure

cc: Hon. Mark A.Hoyer, w/enc.  
Cert. of Service w/enc.

**CERTIFICATE OF SERVICE**

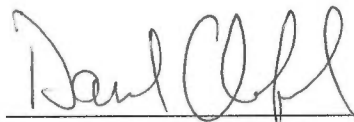
I hereby certify that this day I served a copy of PWSA's Motion for Continuance upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

**Via First Class Mail and Email**

William Towne  
4243 Glen Lytle Rd  
Pittsburgh, PA 15217  
[Firstpeterfourten@gmail.com](mailto:Firstpeterfourten@gmail.com)

Hon. Mark Hoyer  
Administrative Law Judge  
PA Public Utility Commission  
Piatt Place, Suite 220  
301 Fifth Avenue  
Pittsburgh, PA 15222  
[mhoyer@pa.gov](mailto:mhoyer@pa.gov)

Dated: July 8, 2019



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Daniel Clearfield, Esq.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

William Towne,	:	
	Complainant	:
	:	
v.	:	Docket No. C-2019-3008437
	:	
The Pittsburgh Water and Sewer Authority,	:	
	Respondent	:

**MOTION FOR CONTINUANCE**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE MARK A. HOYER:

The Pittsburgh Water and Sewer Authority (“PWSA”) files this Motion for Continuance, pursuant to Section 1.15 of the Pennsylvania Public Utility Commission’s (“PUC” or “Commission”) regulations, 52 Pa. Code § 1.15, and in connection therewith avers as follows:

1. On March 12, 2019, William Towne (“Complainant”) filed formal complaint against PWSA at the PUC
2. On April 1, 2019 PWSA filed and Answer and New Matter and Preliminary Objections.
3. On April 11, 2019, Complainant filed an Answer to Preliminary Objections.
4. On April 22, 2019, Complainant filed Reply to New Matter.
5. On May 8, 2019, an Interim Order Granting Preliminary Objections in Part and Denying Preliminary Objections in Part was entered by Administrative Law Judge Mark a. Hoyer (“ALJ”).
6. By hearing notice dated June 7, 2019, a telephonic hearing was scheduled on the Complaint for July 19, 2019 at 10:00 a.m. The due date for the filing of trial exhibits is July 12, 2019

7. PWSA's counsel has a prior commitment in Philadelphia, Pennsylvania on July 19, 2019, which would preclude him from participating in the hearing as it is currently scheduled. The PUC has scheduled a workshop meeting in Philadelphia on stormwater tariffs and regulations for July 19, 2019 with the Philadelphia Water Department, the PUC and PWSA. Mr. Clearfield must attend this meeting in his role as lead counsel to PWSA on these issues.

8. Requests for continuance may be granted by the presiding officer "for good cause" under Section 1.15 of the Commission's regulations, 52 Pa. Code § 1.15.

9. PWSA submits that the scheduling conflict of its counsel is "good cause" for granting a continuance.

10. PWSA has reached out to the Complainant regarding a rescheduling of the hearing.

WHEREFORE, Pittsburgh Water and Sewer Authority respectfully requests that the Honorable Administrative Law Judge Mark A. Hoyer grant this Motion for Continuance and reschedule the hearing on the formal complaint to another mutually convenient date and time. (This request includes a new due date for filing hearing exhibits.)

Respectfully submitted,



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Dated: July 8, 2019