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January 12, 2021

Via Electronic Filing

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

Re: Proventus Holdings, LLC v. The Pittsburgh Water and Sewer Authority
Docket Nos. C-2020-3023420, C-2020-3023423, C-2020-3023424, C-2020-3023425,
C-2020-3023427, C-2020-3023429, C-2020-3023430, C-2020-3023431, C-2020-
3023433, C-2020-3023434, C-2020-3023435, C-2020-3023438, C-2020-3023439,
C-2020-3023440, C-2020-3023442, C-2020-3023443, C-2020-3023444, and
C-2020-3023445

Dear Secretary Chiavetta:

On December 24, 2020, the Pittsburgh Water and Sewer Authority (“PWSA” or “Authority”) was served with twenty-one Formal Complaints filed by Proventus Holdings, LLC. Under the Commission’s regulations at 52 Pa. Code § 5.61, the current due date for the Answers to the Complaints is January 13, 2021. PWSA respectfully requests a fourteen (14) day extension for the Answers to be filed, making them due on **January 27, 2021**.

PWSA was served with this large volume of Proventus Holdings, LLC formal complaints the day before the year-end holidays, which limited the response time that PWSA staff had to answer to each of the complaints. The additional time requested will allow PWSA’s Legal Department to more fully assess the claims made by Proventus Holding, LLC before providing a substantive and informed response.

At this time, Answers have been filed for three (3) of the twenty-one total Proventus Holdings Formal Complaints at Docket Nos. C-2020-3023421, C-2020-3023422, and C-2020-3023426. PWSA is working diligently to respond to each of the twenty-one Formal Complaints and will continue serving Answers as they are completed.

Accordingly, PWSA respectfully requests that the due date for the Answer to the remaining above captioned Complaints be extended by fourteen (14) days or until January 27, 2021.

Sincerely,

/s/ Lauren M. Burge

Lauren M. Burge

cc: Cert. of Service

CERTIFICATE OF SERVICE

I hereby certify that this date I served a copy of PWSA’s Letter Requesting Extension of Time upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via Email Only

Proventus Holdings, LLC
P.O. Box 58174
Pittsburgh, PA 15209
kim@wgroupholdings.com

Hon. Charles E. Rainey, Jr.,
Chief Administrative Law Judge
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265
bobbwillia@pa.gov

Dated: January 12, 2021

Lauren M. Burge

Lauren M. Burge, Esq.