



THOMAS, NIESEN & THOMAS, LLC

*Attorneys and Counsellors at Law*

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September 15, 2021

***Via Electronic Filing***

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

Re: PaPUC Docket No. C-2021-3025797  
Sharon Wenrich v. Frontier Communications of Pennsylvania, Inc.

Dear Secretary Chiavetta:

We are counsel for Frontier Communications of Pennsylvania, Inc./Commonwealth Telephone Company d/b/a Frontier Communications Commonwealth Telephone Company in the above matter and are submitting, via electronic filing with this letter, a Motion to Continue Telephone Hearing Presently Scheduled for September 30, 2021. A copy of the Motion is being served upon Ms. Wenrich, Complainant, via overnight delivery, as presented in 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.)  
The Honorable F. Joseph Brady, Administrative Law Judge (w/encl., via email)  
Frederick Thomas, Esq. (w/encl. via email)

**Before The  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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**Administrative Law Judge F. Joseph Brady, Residing**

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<b>Sharon Wenrich,</b>	:	
<b>Complainant</b>	:	
	:	
v.	:	<b>Docket No. C-2021-3025797</b>
	:	
<b>Frontier Communications of Pennsylvania,</b>	:	
<b>Respondent</b>	:	

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**NOTICE**

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**TO: SHARON WENRICH  
147 ASPEN LANE  
LEESPORT, PA 19533**

**NOTICE IS HEREBY GIVEN THAT YOU MAY FILE AN ANSWER TO THE FOLLOWING MOTION TO CONTINUE TELEPHONE HEARING PRESENTLY SCHEDULED FOR SEPTEMBER 30, 2021. THE MOTION IS SUBMITTED IN ACCORDANCE WITH THE PREHEARING ORDER OF JUDGE BRADY WHICH PROVIDES THAT REQUESTS FOR CONTINUANCES MAY BE SUBMITTED AT LEAST FIVE DAYS BEFORE THE HEARING.**

**DATE OF SERVICE: SEPTEMBER 15, 2021**

**Before The  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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**Administrative Law Judge F. Joseph Brady, Presiding**

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<b>Sharon Wenrich,</b>	:	
<b>Complainant</b>	:	
	:	
<b>v.</b>	:	<b>Docket No. C-2021-3025797</b>
	:	
<b>Frontier Communications of Pennsylvania,</b>	:	
<b>Respondent</b>	:	

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**MOTION TO CONTINUE TELEPHONE HEARING PRESENTLY  
SCHEDULED FOR SEPTEMBER 30, 2021**

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AND NOW, comes Commonwealth Telephone Company d/b/a Frontier Communications Commonwealth Telephone Company (“Frontier”), by its attorneys, and, pursuant to Paragraph 2 – Continuances, of the Prehearing Order for Telephone Hearing, dated September 13, 2021, submits this Motion to Continue Telephone Hearing Presently Scheduled for September 30, 2021. In support of the Motion, Frontier submits as follows:

1. This proceeding concerns the Complaint of Sharon Wenrich against Frontier filed on or about April 16, 2021.
2. Frontier filed an Answer to the Complaint on June 18, 2021.
3. By Notice dated August 10, 2021, a Call-In Telephone Hearing was scheduled for September 30, 2021, with Administrative Law Judge F. Joseph Brady presiding.
4. Judge Brady issued a Prehearing Order for Telephone Hearing on September 13, 2021. Paragraph 2 of the Prehearing Order allows for continuances of the hearing and provides that a request for continuance must be submitted in writing.

5. The undersigned counsel for Frontier is also counsel for Aqua Pennsylvania Wastewater, Inc. in a Section 1329 Application proceeding at A-2021-3024267. Section 1329 proceedings must be concluded within six months of the filing of an Application. They are, consequently, processed on an expedited basis following a timeline created by the Commission, specifically, for Section 1329 proceedings.

6. At a prehearing conference on September 9, 2021, in the Aqua Section 1329 proceeding, evidentiary hearings were scheduled for September 29 and 30, 2021, creating a conflict for counsel with the September 30, 2021, hearing date in this Complaint proceeding.

7. Counsel submits that the conflict with the hearing dates should be resolved by continuing and rescheduling the hearing in this matter. Although the hearing in this complaint proceeding was scheduled prior to the hearing in the Section 1329 proceeding, there is no deadline for concluding this proceeding and scheduling flexibility exists to allow the hearing to be rescheduled.

8. The Section 1329 proceeding, on the other hand, has a six-month statutory deadline as set forth above and a timeline created by the Commission, specifically, for Section 1329 proceedings. The timeline affords no flexibility to avoid conflicts with already scheduled matters for which there is no statutory deadline.

9. Counsel submits that the foregoing presents good cause for continuing and rescheduling the hearing presently scheduled for September 30, 2021, in this matter and requests that the hearing in this Complaint proceeding be continued and rescheduled.

10. Ms. Wenrich's position concerning the continuance is not known. A call to Ms. Wenrich on September 15, 2021, was not answered and, as of the filing of this Motion, had not been returned.

WHEREFORE Commonwealth Telephone Company d/b/a Frontier Communications  
Commonwealth Telephone Company respectfully requests that Administrative Law Judge Brady grant  
this Motion and continue the Telephone Hearing presently scheduled for September 30, 2021.

Respectfully submitted,



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*Attorney for Respondent  
Commonwealth Telephone Company d/b/a  
Frontier Communications Commonwealth  
Telephone Company*

DATED: September 15, 2021

**Before The  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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**Administrative Law Judge F. Joseph Brady, Presiding**

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<b>Sharon Wenrich,</b>	:	
<b>Complainant</b>	:	
	:	<b>Docket No. C-2021-3025797</b>
<b>v.</b>	:	
	:	
<b>Frontier Communications of Pennsylvania,</b>	:	
<b>Respondent</b>	:	

**CERTIFICATE OF SERVICE**

I hereby certify that I have this 15<sup>th</sup> day of September 2021, served a true and correct copy of the foregoing Motion to Continue Telephone Hearing Presently Scheduled for September 30, 2021, upon the person and in the manner indicated below:

**VIA OVERNIGHT DELIVERY**

Sharon Wenrich  
147 Aspen Lane  
Leesport, PA 19533

  
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Thomas T. Niesen (PA ID # 31379)