

Stevens & Lee

17 N. Second Street, 16th Floor
Harrisburg, PA 17101
(717) 234-1090
www.stevenslee.com

Direct Dial: (717) 255-7365
Email: michael.gruin@stevenslee.com

March 25, 2022

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

**RE: 600 Scranton, LLC v. Pennsylvania-American Water Company
Docket No. C-2021-3024207**

Dear Secretary Chiavetta:

Enclosed please find Pennsylvania-American Water Company's Uncontested Motion for a Continuance in the above-referenced matter. Please feel free to contact me with any questions or concerns.

Best Regards,

STEVENS & LEE



Michael A. Gruin

cc: ALJ Dennis Buckley (via email)
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

600 SCRANTON, LLC	:	
Complainant	:	
	:	
v.	:	Docket No. C-2021-3024207
	:	
PENNSYLVANIA-AMERICAN	:	
WATER COMPANY	:	
Respondent	:	

**UNOPPOSED MOTION FOR CONTINUANCE OF
PENNSYLVANIA-AMERICAN WATER COMPANY**

AND NOW, Pennsylvania-American Water Company (“PAWC” or “Company”), by and through its attorneys Stevens & Lee, P.C., hereby files this Motion pursuant to 52 Pa Code § 1.15 to request a continuance of the hearing scheduled for March 29, 2022 in this matter, for the reasons set forth below:

1. On February 18, 2021, PAWC was served with a Formal Complaint (“Complaint”) filed by 600 Scranton, LLC (“Complainant”) against the Company.
2. PAWC filed its Answer to the Complaint on March 10, 2021.
3. By Notice issued on February 14, 2022, the Hearing in this matter was scheduled for March 29, 2022.
4. Since the issuance of the hearing Notice, the parties have engaged in discussions towards a settlement and the Complainant undertook a new investigation of the potential sources of water leaks at the Complainant’s property.
5. The parties have agreed that a 30 day continuance of the hearing in this matter may streamline the issues in dispute and allow for a potential full settlement of the Complaint. Therefore, Pennsylvania-American Water Company, with the consent of the

Complainant, respectfully requests that the hearing be postponed for approximately 30 days and re-scheduled.

6. Counsel for PAWC conferred with counsel for the Complainant, and he indicated that he has no objection to a rescheduling of the hearing.

REQUEST FOR RELIEF

WHEREFORE, for all of the reasons stated herein, Pennsylvania-American Water Company respectfully requests that the hearing in this matter be continued and the hearing rescheduled, as set forth above.

Respectfully submitted,



Michael A. Gruin, (I.D. No. 78625)
STEVENS & LEE
17 N. 2nd St., 16th Fl
Harrisburg, PA 17101
Tel. (717) 255-7365
Fax (610) 988-0852
COUNSEL FOR PENNSYLVANIA
AMERICAN WATER COMPANY

DATE: March 25, 2022

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

600 SCRANTON, LLC	:	
Complainant	:	
	:	
v.	:	Docket No. C-2021-3024207
	:	
PENNSYLVANIA-AMERICAN	:	
WATER COMPANY	:	
Respondent	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing Motion upon the party listed below, in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a party).

VIA Electronic Mail

Thomas Jones, Esq.
410 Spruce St., Suite 301
Scranton, PA 18503
TjJonesLaw@comcast.net



Michael A. Gruin

DATED: March 25, 2022

