

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Carson DevCo, LLC,

Docket No. C-2022-3034935 (water)

Docket No. C-2022-3034934 (wastewater)

v.

The Pittsburgh Water and Sewer Authority,

**CARSON DEVCO, LLC'S RESPONSE
TO THE PITTSBURGH WATER AND
SEWER AUTHORITY'S MOTION TO
CONSOLIDATE**

Filed on Behalf of Carson DevCo, LLC

Counsel of Record for This Party:
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AND NOW, comes Carson DevCo, LLC, by and through its attorneys, Michael E. Fiffik, and Fiffik Law Group, P.C., and files the within Response to The Pittsburgh Water and Sewer Authority's Motion to Consolidate as follows:

1. On September 2, 2022, Carson DevCo, LLC filed a Formal Complaint with the Commission regarding a billing dispute with The Pittsburgh Water and Sewer Authority ("PWSA").
2. The Formal Complaint was docketed at Docket Nos. C-2022-3034935 (water) and C-2022-3034934 (wastewater) due to the involvement of two utility services.
3. On September 22, 2022, PWSA filed a Motion to Consolidate Docket Nos. C-2022-3034935 (water) and C-2022-3034934 (wastewater).
4. As the Formal Complaint disputes bills from PWSA which contain charges for both water and wastewater/sewer services, Carson DevCo, LLC does not object to PWSA's request for consolidation.
5. Moreover, Carson DevCo, LLC recognizes that the Commission has authority pursuant to Section 5.81(a) of its Regulations to consolidate proceedings involving a common question of law or fact to be considered.

6. Carson DevCo, LLC agrees that consolidating Docket Nos. C-2022-3034935 (water) and C-2022-3034934 (wastewater) would promote judicial economy and conserve resources of the parties and the Commission.

WHEREAS, Carson DevCo, LLC respectfully submits the within Response to PWSA's Motion for Consolidation and consents to PWSA's request that the Office of Administrative Law Judge Consolidate Docket Nos. C-2022-3034935 (water) and C-2022-3034934 (wastewater) into one proceeding.

Date: October 12, 2022

Respectfully submitted,

FIFFIK LAW GROUP, P.C.

/s/ Michael E. Fiffik _____

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CERTIFICATE OF SERVICE

I hereby certify that on October 12, 2022, I served a copy of the foregoing Response to Motion to Consolidate upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via Electronic Mail Only

Hon. Charles E. Rainey, Jr.
Chief Administrative Law Judge
Pa. Public Utility Commission
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