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January 30, 2023

VIA ELECTRONIC FILING

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

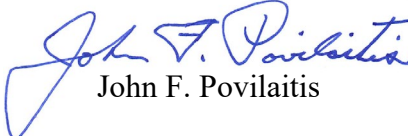
Re: StoneyBank Development, LLC v. The Walnut Hill Utility Company
Docket No. C-2020-3022179

Dear Secretary Chiavetta:

Enclosed for electronic filing please find Motion for Continuance, Service on Additional Parties and Consolidation on behalf of The Walnut Hill Utility Company with regard to the above-referenced matter.

Copies to be served in accordance with the attached Certificate of Service.

Very truly yours,


John F. Povilaitis

JFP/kas
Enclosure
cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

StoneyBank Development, LLC	:	
<i>Complainant,</i>	:	
	:	
v.	:	Docket No. C-2020-3022179
	:	
The Walnut Hill Utility Company	:	
<i>Respondent</i>	:	

NOTICE TO PLEAD

Via Email Only

To: StoneyBank Development, LLC

You are hereby notified that a reply to the enclosed Motion for Continuance, Service of Complaint on Additional Parties and Consolidation of The Walnut Hill Utility Company must be filed in accordance within 20 days or such shorter time period as may be established by the Administrative Law Judge. All pleadings, such as a response to a Motion for Continuance, must be filed with the Secretary of the Pennsylvania Public Utility Commission with a copy served to counsel for The Walnut Hill utility Company and the ALJ.

Filed with:

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

Hon. Steven K. Haas
Administrative law Judge
Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
400 North Street, 2nd Floor West
Harrisburg, PA 17120
sthaas@pa.gov

Eileen Lehman, President
The Walnut Hill Utility Company
400 Ashley Court
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jnase@cozen.com

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

StoneyBank Development, LLC	:	
<i>Complainant,</i>	:	
	:	
v.	:	Docket No. C-2020-3022179
	:	
The Walnut Hill Utility Company	:	
<i>Respondent</i>	:	

MOTION FOR CONTINUANCE

To The Honorable Steven K. Haas:

In accordance with 52 Pa. Code Section 5.103, The Walnut Hill Utility Company (“Walnut Hill”), Respondent in the above-captioned proceeding, respectfully requests a thirty (30) day extension of time for the Initial Telephonic Prehearing Conference set for this proceeding, and in support thereof, represents as follows:

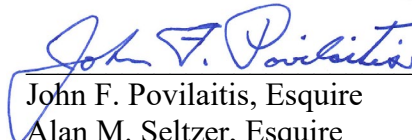
1. The Pennsylvania Public Utility Commission (“Commission”) has noticed an Initial Telephonic Prehearing Conference in this matter before Administrative Law Judge Steven K Haas for March 9, 2023.
2. Buchanan Ingersoll and Rooney PC has recently been retained as counsel for Walnut Hill and entered an appearance in this matter.
3. This proceeding has an extensive procedural history and involves matters extending back several years. In order to adequately represent Walnut Hill in this matter, counsel will require substantial time to become familiar with the facts and outstanding issues in this proceeding.

4. Accordingly, on behalf of Walnut Hill, counsel requests a thirty (30) day extension of time from March 9, 2023 for convening of the Initial Prehearing Telephonic Conference in this matter.

5. Counsel for Complainant StoneyBank Development LLC has been contacted regarding this request for continuance and does not object to it being granted.

WHEREFORE, The Walnut Hill Utility Company respectfully requests that a thirty (30) day extension of time be granted for convening the Initial Telephonic Prehearing Conference in this matter.

Respectfully submitted,



John F. Povilaitis, Esquire
Alan M. Seltzer, Esquire
Robert Burns, Esquire
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Date: January 30, 2023

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

StoneyBank Development, LLC	:	
Complainant	:	
	:	
v.	:	Docket No. C-2020-3022179
	:	
The Walnut Hill Utility Company	:	
Respondent	:	

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the foregoing document upon persons listed below in the manner indicated in accordance with the requirements of 52 Pa Code § 1.54.

VIA EMAIL

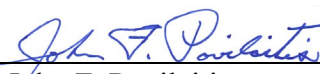
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tereswagne@pa.gov

By: 

John F. Povilaitis

DATED: January 30, 2023