



January 31, 2023

VIA E-FILING

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

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

Answer of StoneyBank Development LLC to the Motion for Continuance of The Walnut Hill Utility Company

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission ("Commission") is the Answer of StoneyBank Development LLC to the Motion for Continuance of The Walnut Hill Utility Company. Copies are being served as shown on the attached certificate of service.

Please contact me if you have any questions regarding this filing. Thank you.

Sincerely,

COZEN O'CONNOR

By: Jonathan P. Nase
Counsel for *StoneyBank Development LLC*

JPN:kmg
Enclosure

cc: Administrative Law Judge Steven K. Haas
Per Certificate of Service
Stephen G. Mantakounis

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

StoneyBank Development LLC

v.

The Walnut Hill Utility Company

:
:
:
:
:

Docket No. C-2020-3022179

CERTIFICATE OF SERVICE

I hereby certify that I have this 31st day of January, 2023 served a true copy of the foregoing **Answer of StoneyBank Development LLC to Motion for Continuance of The Walnut Hill Utility Company** upon the following, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

Via E-mail and First Class Mail

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Jonathan P. Nase, Esquire
Counsel for *StoneyBank Development LLC*

VERIFICATION

I, STEPHEN MANTAKOONIS, hereby state that the facts set forth above are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: January 31, 2023



**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**ANSWER OF STONEYBANK DEVELOPMENT LLC
TO THE MOTION FOR CONTINUANCE OF
THE WALNUT HILL UTILITY COMPANY**

AND NOW COMES StoneyBank Development LLC (“StoneyBank”), pursuant to 52 Pa. Code §§ 5.103(c), to submit this Answer (“Answer”) to the Motion for Continuance (“Motion”) filed by The Walnut Hill Utility Company (“Walnut Hill”) on January 30, 2023. StoneyBank has no objection to the requested continuance.

1. Admitted.
2. Admitted.
3. It is admitted that this proceeding has an extensive procedural history, and that Walnut Hill’s new counsel needs a reasonable period of time to become familiar with it.
4. This paragraph states a request for relief, to which no response is required.
5. Admitted, but StoneyBank reserves its right to object to any future requests for continuance. As noted in the Motion, this proceeding already has an extensive procedural history, going back several years. StoneyBank is hopeful the matter can proceed without further delay.

WHEREFORE, StoneyBank Development LLC has no objection to The Walnut Hill Utility Company's request for a thirty-day extension of the Prehearing Conference scheduled for March 9, 2023.

Respectfully submitted,



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Date: January 31, 2023

Counsel for *StoneyBank Development LLC*