

July 11, 2024

Via Electronic Filing

Rosemary Chiavetta, Esquire
Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Docket Nos. C-2022-3036893 and C-2022-3037118
SCH USA, LLC v. Aqua Pennsylvania Wastewater, Inc.
Motion to Stay Procedural Schedule of Aqua**

Dear Secretary Chiavetta:

Attached for filing is the Motion of Aqua Pennsylvania Wastewater, Inc. to stay the procedural schedule in the above-referenced matters.

A copy of the attached Motion has been provided to the relevant parties in the manner indicated on the attached Certificate of Service.

If there are any questions, please do not hesitate to contact me.

Very truly yours,

Reger Rizzo & Darnall LLP


Margaret A. Morris

MAM/co
Enclosures

cc: The Hon. John Coogan, PA Public Utility Commission [w/encl.]
Heather S. D. Harrison, Aqua Pennsylvania, Inc. [w/encl.]
Service List [w/encl.]

**Re: Docket Nos. C-2022-3036893 and C-2022-3037118
SCH USA, LLC v. Aqua Pennsylvania Wastewater, Inc.
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served upon the following person(s), in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

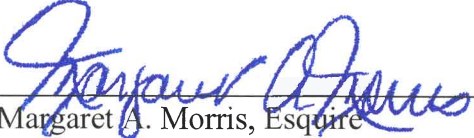
Via Electronic Mail

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Dated: July 11, 2024


Margaret A. Morris, Esquire

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

SCH USA, LLC :
 :
 v. : Docket No. C-2022-3036893
 : Docket No. C-2022-3037118
 :
 AQUA PENNSYLVANIA WASTEWATER, INC. :

NOTICE TO PLEAD

Pursuant to 52 Pa. Code § 5.103(c), you are hereby notified that if you do not file a written response to the enclosed Motion of Aqua Pennsylvania Wastewater, Inc. to Stay the Procedural Schedule, **within five (5) days** from service of this Notice, the facts set forth by Aqua Pennsylvania Wastewater, Inc. in the Motion may be deemed to be true, whereby requiring no other proof. All pleadings, such as an Answer to the Motion to Stay the Procedural Schedule, must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy served to counsel for Aqua Pennsylvania Wastewater, Inc., Margaret A. Morris, Esq., and the Honorable John M. Coogan presiding over this proceeding.

File by Mail or e-filing with:

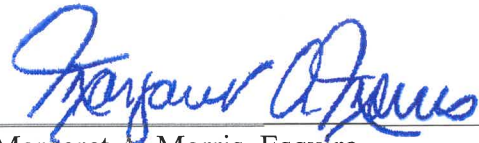
Rosemary Chiavetta, Esquire
Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

With a copy to:

Margaret A. Morris, Esquire
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Philadelphia, PA 19104
mmorris@regerlaw.com

Date: July 11, 2024

The Hon. John M. Coogan
jcoogan@pa.gov



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Counsel for Aqua Pennsylvania Wastewater, Inc.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

SCH USA, LLC	:	
	:	Docket Nos. C-2022-3036893
v.	:	C-2022-3037118
	:	
AQUA PENNSYLVANIA	:	
WASTEWATER, INC.	:	

**MOTION OF AQUA PENNSYLVANIA WASTEWATER, INC.
TO STAY PROCEDURAL SCHEDULE**

TO THE ADMINISTRATIVE LAW JUDGE JOHN COOGAN:

Aqua Pennsylvania Wastewater, Inc. (“Aqua PA WW”) hereby respectfully requests a stay of the procedural litigation schedule in the Formal Complaints of SCH USA, LLC (“Complainant”) at Docket Nos. C-2022-3036893 and C-2022-3037118, collectively the “Complaints.” As explained in more detail in the Company’s Motion to Consolidate efiled earlier today, Aqua is requesting consolidation of the Complaints with the Aqua PA WW pending base rate case at Docket Nos. R-2024-3047824, *et al.* (“2024 Base Rate Case”) due to the same issues¹ being raised by the Complainant who recently intervened in the 2024 Base Rate Case. When the Complaints were filed, the 2024 rate application had not been filed.

The Company contends that in the interests of administrative efficiency and judicial economy, that the litigation schedule in the above-captioned matters should be stayed until a ruling on the Motion to Consolidate. There is no harm to the Complainant if the requested

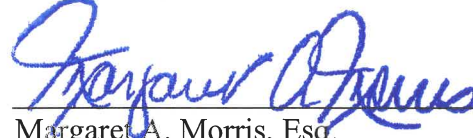
¹ The issue not raised in the 2024 Base Rate Case is the Complainant’s request, should the allocated EDUs be reduced, a retroactive refund to the purchase date of the property in October 2020.

stay is granted. The due date for their responsive testimony, should the Motion to Consolidate be denied, will be adjusted.

In the alternative, the Company respectfully requests a limited extension of time to submit its Rebuttal Testimony, due on July 12, 2024, be granted to allow it to address the impact of the Complainant's intervention in the 2024 Base Rate Case on the instant proceeding.

WHEREFORE, Aqua Pennsylvania Wastewater, Inc. respectfully requests a stay of the procedural schedule pending the disposition of its Motion to Consolidate or, in the alternative, an extension of time for the Company to file its Rebuttal Testimony.

Respectfully submitted,



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Date: July 11, 2024

Counsel for Aqua Pennsylvania Wastewater, Inc.