

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Mark Mazza

V

C-2024-3047180

Aqua Pennsylvania, Inc.

MOTION FOR CONTINUANCE

1 The hearing regarding this matter was continued to July 2, 2024, and petitioner's prior motion for

continuance was dismissed as moot.

2 After receipt of the new hearing notice, petitioner advised counsel for respondent he would be

requesting a continuance of the hearing due to vacation the week of June 30 to July 6.

Petitioner will be

staying in a shared unit. No opposition was stated at that time for a continuance.

(Willbrook, NJ)

3. Petitioner's water meter was recently replaced, and the removed meter was tested by respondent on

June 17 and June 19.

4. In the fall 2023, prior to petition filing with the PUC, respondent was scheduled to conduct a onsite

water meter examination, and instead this was not done with the representative using a remote scanning

device while driving past the property to read the meter and confirmed there was no finding of water leaks

at the property in question.

5. At the time of the visit petitioner requested the representative provide the name of the scanning device

and printout of the scanning device findings which included information in chart and/or graph form.

6. The representative refused to provide the above and said to contact the respondents office about the

same.

7. Petitioner proceeded with contact to respondent seeking the above information and respondent failed to

provide the information and said another representative would contact petitioner but there was no follow

up by respondent.

8. With the water meter testing completed , petitioner seeks the above additional information in order to

address claims in the petition regarding monthly meter readings and billings, and how the meter

readings were obtained( actual or by scanner)

9. Monthly billing issues,, shutoffs and other claims are set forth in the complaint, which to the best extent

possible documents were requested from respondent by way of the request to produce , which is attached

hereto.(served 6/17/24)

10. This matter was continued so the parties could attempt resolution. Petitioner was unaware of PUC

discovery rules until recently ,and determined documents from respondent are necessary to discuss

settlement or for use at the hearing.

11. With the recent testing by respondent and to address the issue of bills and other matters in the

complaint, it is necessary that additional information be obtained through discovery.

12. Information requested, including the discovery, is in the exclusive control of the respondent.

13. Petitioner seeks a 14 day continuance of the hearing so discovery responses can be obtained

and to prepare for a full due process hearing, if necessary.

14. Petitioner avers good cause and reasons exist to support a 14 day continuance.

15. Due to lack of settlement discussions as the primary reason , respondent opposes this continuance

request. This opposition was received by email on June 18, a day after petitioner emailed counsel for

respondent requests for production of documents

16. If the request is granted , it will allow for productive settlement discussions, and if need be for a

full and fair hearing.

Wherefore, it is requested this motion be granted.

  
MARK MAZZA

RCVD PUC SEC BUR  
JUN 28 2024 AM 10:31

Certificate of Service

I hereby certify the attached was served on the below named by USPS First Class Mail on

6/28/24

Margaret Morris , Esq.  
Reger Rizzo and Darnell  
Cira Centre, 13th Fl.  
2929 Arch St.  
Phila. Pa. 19104

  
MARK MAZZA

1271 Fern Rd  
Berwyn, Pa. 19812

Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, Pa. 17120

NEOPOST  
06/20/2024  
US POSTAGE \$000.64<sup>0</sup>



ZIP 19406  
041M11461449

1712090079 0500

