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October 15, 2024

**VIA ELECTRONIC FILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, Filing Room  
Harrisburg, PA 17120

Re: Application For Certificate Of Public Convenience And All Necessary Approvals Nunc Pro Tunc For Mainlines, Manholes & Wastewater Treatment Inc. To Provide Wastewater Services To Portions Of Girard Township and Waterford Township, Erie County, Pennsylvania, Approval Of Affiliated Interest Agreement, And All Other Approvals As May Be Necessary Or Proper, Including an Affiliated Interest Agreement; Docket Nos. A-2024-3050786; **UNOPPOSED MOTION FOR STAY**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is Mainlines, Manholes & Wastewater Treatment Inc.'s Unopposed Motion for Stay.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

*/s/ Whitney E. Snyder*

Whitney E. Snyder  
Aaron D. Rosengarten

*Counsel for  
Mainlines, Manholes & Wastewater Treatment Inc.*

WES/das

Enclosures

cc: Honorable Katrina L. Dunderdale ([kdunderdal@pa.gov](mailto:kdunderdal@pa.gov))  
Mary G. Swarner, Legal Assistant ([mswarner@pa.gov](mailto:mswarner@pa.gov))  
Per Certificate of Service



3. On August 28, 2024, MMWT filed an amended application updating the service area from Fairview Township to Waterford Township and advising the Pennsylvania Public Utility Commission (“Commission”) that MMWT is not seeking to serve Fairview Township (“Amended Application”).

4. On September 10, 2024, OSBA filed a protest to the Amended Application.

5. On September 13, 2024, the Commission’s Bureau of Technical Utility Services (“TUS”) served MMWT data requests.

6. On September 20, 2024, the Commission issued a Call-in Telephonic Prehearing Conference Notice scheduling a prehearing conference for October 22, 2024 before Administrative Law Judge (“ALJ”) Katrina L. Dunderdale.

7. On October 3, 2024, MMWT served partial responses to TUS’ Data Requests.

8. On October 7, 2024, ALJ Dunderdale issued a Prehearing Conference Order requiring the parties to submit prehearing conference memoranda by 4:00 p.m. Monday October 21, 2024.

## **II. MOTION TO STAY PROCEEDING**

9. MMWT respectfully requests that this proceeding be stayed for 90 days.

10. MMWT is requesting a stay to engage in settlement discussions and to allow it to continue gathering and submitting information that the Commission requested be submitted in connection with the Amended Application.

11. The Bureau of Technical Utility Services issued approximately 50 data requests. MMWT is continuing to gather, compile and submit information requested.

12. MMWT will provide status updates on behalf of the parties every 30 days.

13. Prior to filing this Motion, the undersigned conferred with counsel for OSBA who advised that it does not oppose MMWT's request to stay the proceeding.

14. MMWT further notes that it is already providing service to the area for which it has applied for a certificate of public convenience and is continuing to do so under the same terms and conditions as prior to the filing of the Application and Amended Application. MMWT is a very small, family operated utility that is doing its best to come into compliance with Commission regulation but requires additional time to gather information the Bureau of Technical Utility Services has requested.

15. Accordingly, in the interest of judicial economy and to prevent litigation costs and strain on the limited resources of the parties, MMWT respectfully requests that Your Honor grant this Motion and stay this proceeding for 90 days.

### III. CONCLUSION

WHEREFORE, for the reasons stated above, Mainlines, Manholes & Wastewater Treatment Inc. respectfully requests that Administrative Law Judge Katrina L. Dunderdale grant this Motion and stay the above-captioned proceeding for 90 days.

Respectfully submitted,

/s/ Whitney E. Snyder

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*Attorneys for Mainlines, Manholes & Wastewater Treatment Inc.*

Dated: October 15, 2024

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

**BY EMAIL ONLY**

Rebecca Lyttle  
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Harrisburg, PA 17101  
[relyttle@pa.gov](mailto:relyttle@pa.gov)

*/s/ Whitney E. Snyder*

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Whitney E. Snyder

Aaron D. Rosengarten

Dated this 15<sup>th</sup> day of October, 2024