

# Stevens & Lee

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October 29, 2024

VIA ELECTRONIC FILING

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

**RE: Vera Scroggins v. Pennsylvania-American Water Company**  
**Docket No. C-2023-3039609**

Dear Secretary Chiavetta:

Enclosed for filing on behalf of Pennsylvania-American Water Company is its Motion requesting a continuance of the hearing scheduled for November 13, 2024 in this matter, or in the alternative, conversion of the hearing to a Prehearing Conference. A copy has been served on the Complainant in accordance with the attached Certificate of Service.

If you have any questions, please feel free to contact me.

Very truly yours,

STEVENS & LEE



Michael A. Gruin

Enc.

cc: Certificate of Service  
Administrative Law Judge Marta Guhl (via electronic mail)

Allentown • Bergen County • Bala Cynwyd • Fort Lauderdale • Harrisburg • Lancaster • New York  
Philadelphia • Princeton • Reading • Rochester • Scranton • Valley Forge • Wilkes-Barre • Wilmington  
A PROFESSIONAL CORPORATION

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

VERA SCROGGINS	:	
Complainant	:	
	:	
v.	:	Docket No. C-2023-3039609
	:	
PENNSYLVANIA-AMERICAN	:	
WATER COMPANY	:	
Respondent	:	

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**MOTION FOR CONTINUANCE OF  
PENNSYLVANIA-AMERICAN WATER COMPANY**

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AND NOW, Pennsylvania-American Water Company (“PAWC” or “Company”), by and through its attorneys Stevens & Lee, P.C., hereby files this Motion pursuant to 52 Pa Code § 1.15 to request a continuance of the hearing scheduled for November 13, 2024 in this matter, for the reasons set forth below:

1. On April 6, 2023, the Company was served with a notice of the Formal Complaint (“Complaint”) filed by the Complainant against the Company.
2. On April 26, 2023, the Company filed an Answer and New Matter to the Complaint, as well as Preliminary Objections to the Complaint.
3. On December 1, 2023, Administrative Law Judge Marta Guhl issued an Interim Order on Preliminary Objections (“Interim Order”).
4. The Interim Order held that:

“Complainant did not specify any actions by the Company that violate the Commission’s statute, regulations or orders in this particular matter. The Complainant failed to indicate any specific relief that the Commission can grant in this case. The Respondent is left to speculate as to the reason for the Complaint and the relief that the Complainant is seeking.”

5. The Interim Order directed the Complainant to file an amendment to the Complaint which includes more details regarding the nature of her dispute with the Respondent and which states with specificity what she would like the Commission to do to resolve his dispute.

6. The Complainant filed her “Amended Formal Complaint” on December 12, 2023.

7. On January 2, 2024, PAWC filed its Preliminary Objections to the Amended Complaint, which request dismissal of the Amended Complaint for Lack of Standing and for Legal Insufficiency.

8. By Prehearing Order issued on October 23, 2024, a Telephonic Hearing in this matter was scheduled for November 13, 2024.

9. PAWC’s Preliminary Objections to the Amended Complaint are still pending and no order has been issued regarding the disposition of PAWC’s Preliminary Objections.

10. Because PAWC’s Preliminary Objections have not been resolved yet, and because resolution of those Preliminary Objections may result in the dismissal of the Amended Complaint without the need for a hearing, Pennsylvania-American Water Company respectfully requests that the hearing be postponed until such time as a ruling on the Preliminary Objections is issued.

11. In the alternative, PAWC would request that the hearing scheduled for November 13, 2024 be converted to a Pre-Hearing Conference in order to clarify the scope of the proceeding.

**REQUEST FOR RELIEF**

WHEREFORE, for all of the reasons stated herein, Pennsylvania-American Water Company respectfully requests that the November 13, 2024 hearing in this matter be continued, as set forth above, or in the alternative, converted to a prehearing conference.

Respectfully submitted,



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COUNSEL FOR PENNSYLVANIA  
AMERICAN WATER COMPANY

DATE: October 29, 2024

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

VERA SCROGGINS	:	
Complainant	:	
	:	
v.	:	Docket No. C-2023-3039609
	:	
PENNSYLVANIA-AMERICAN	:	
WATER COMPANY	:	
Respondent	:	

**CERTIFICATE OF SERVICE**

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

VIA First Class U.S. Mail

Vera Scroggins  
71 Gus Park Lane  
Brackney, PA 18812



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Michael A. Guin

DATED: October 29, 2024