



January 9, 2025

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VIA E-FILE

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

Re: *Nunc Pro Tunc* Petition of Pennsylvania-American Water Company for Limited Waiver of 52 Pa. Code § 56.11(a) and Related Tariff Provisions; Docket No. P-2024-3051518

Joint Motion of Pennsylvania-American Water Company and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission is the above-referenced Joint Motion. Copies have been served in accordance with the attached Certificate of Service.

If you have any questions regarding this filing, please direct them to me. Thank you for your attention to this matter.

Sincerely,

COZEN O'CONNOR

By: David P. Zambito
Counsel for *Pennsylvania-American Water Company*

DPZ
Enclosures

cc: Hon. Deputy Chief Administrative Law Judge Mark A. Hoyer
Per Certificate of Service
Elizabeth Rose Triscari, Esq.
Teresa K. Harrold, Esq.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Nunc Pro Tunc Petition of Pennsylvania-American :
Water Company for Limited Waiver of 52 Pa. Code : Docket No. P-2024-3051518
§ 56.11(a) and Related Tariff Provisions :

CERTIFICATE OF SERVICE

I hereby certify that I am this 9th day of January, 2025, serving the **Joint Motion of Pennsylvania-American Water Company and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania** upon the persons and in the manner indicated below, which service satisfies the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

Service by First Class Mail and Email

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Ria M. Pereira, Esq.
Elizabeth R. Marx, Esq.
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Respectfully submitted,



David P. Zambito, Esq.
Counsel for *Pennsylvania-American Water
Company*

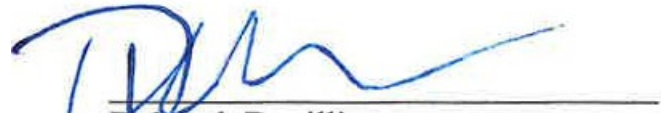
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In re: *Nunc Pro Tunc* Petition of :
Pennsylvania-American Water Company for : Docket No. P-2024-3051518
Limited Waiver of 52 Pa. Code § 56.11(a) and :
Related Tariff Provisions :

VERIFICATION

I, **Deborah Degillio**, hereby state that the facts set forth in the Joint Motion are true and correct to the best of my knowledge, information, and belief. I understand that this verification is made subject to the provisions and penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Date: January 9, 2025



Deborah Degillio

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Nunc Pro Tunc Petition of Pennsylvania-American : Docket Nos. P-2024-3051518
Water Company for Limited Waiver of 52 Pa. Code :
§ 56.11(a) and Related Tariff Provisions :

JOINT MOTION

Pennsylvania-American Water Company (“PAWC”) and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (jointly, the “Moving Parties”) file this Joint Motion in the above-captioned proceeding. In support of the Motion, the Moving Parties represent as follows:

1. On October 3, 2024, PAWC filed the Petition for Limited Waiver (“Petition”) that initiated this proceeding.
2. On October 23, 2024, the Office of Small Business Advocate (“OSBA”) filed a Notice of Intervention.
3. On October 23, 2024, CAUSE-PA filed a Petition to Intervene and Answer.
4. On November 12, 2024, PAWC filed Preliminary Objections at this docket requesting that the Administrative Law Judge (“ALJ”) strike impertinent matter from CAUSE-PA’s Petition to Intervene, and direct CAUSE-PA to file an amended Petition to Intervene to establish its standing regarding the narrow scope of issues in this proceeding.
5. On November 19, 2025, Deputy Chief Administrative Law Judge Mark A. Hoyer was assigned to this matter.
6. On November 20, 2024, the Office of Consumer Advocate (“OCA”) filed a Notice of Intervention.

7. On November 22, 2025, CAUSE-PA filed an Answer to PAWC's Preliminary Objections.

8. A Prehearing Conference is scheduled for January 15, 2025 at 10 a.m. ALJ Hoyer directed the Parties to submit prehearing memoranda, including proposed litigation schedules, by January 14, 2025.

9. The Moving Parties have begun and intend to continue informal discovery and settlement discussions in this matter. Accordingly, the Moving Parties respectfully request to remain in a settlement phase and not to adopt a litigation schedule at this time.

10. The Moving Parties further request cancellation of the January 15, 2025 Prehearing Conference. Instead, the Parties propose to provide status reports via e-mail to ALJ Hoyer every 30 days regarding the Moving Parties' settlement progress beginning on or about February 15, 2025.

11. Finally, the Moving Parties request that ALJ Hoyer hold any ruling on PAWC's Preliminary Objections in abeyance until the Moving Parties determine if settlement is achievable in this matter. Through this Joint Motion, PAWC withdraws its objection to CAUSE-PA's standing in this matter, but continues to object to the scope of the proceeding described in CAUSE-PA's Petition to Intervene and Answer. If the Moving Parties do not reach a settlement, the Moving Parties expect to be able to mutually agree to limit the scope of issues for litigation, which may allow PAWC to withdraw its Preliminary Objections.

12. The Moving Parties contacted the OCA and the OSBA regarding this Joint Motion. Neither the OCA nor the OSBA oppose this Joint Motion.

WHEREFORE, the Moving Parties, by their respective counsel, respectfully request that the Honorable Deputy Chief Administrative Law Judge Mark A. Hoyer approve this Joint Motion.



Respectfully submitted,

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Respectfully submitted,



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