

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

AMERICA'S BEST VALUE INN

C-2024-3047802

C-2024-3047806

v.

PENNSYLVANIA AMERICAN
WATER COMPANY

Type of Pleading:
**MOTION FOR
RECONSIDERATION AND
REQUEST TO VACATE
ORDER**

Filed on Behalf of Complainant:
America's Best Value Inn

Counsel of Record for This Party:
LANE M. TURTURICE, ESQ.
PA I.D. NO. 85088

Turturice & Associates, LLC
70 E. Wheeling Street
Washington, PA 15301
(724) 470-9640

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

AMERICA'S BEST VALUE INN

C-2024-3047802

C-2024-3047806

v.

PENNSYLVANIA AMERICAN
WATER COMPANY

ORDER

AND NOW, this _____ day of _____, 2025 upon consideration of the within Motion for Reconsideration and Request to Vacate Order, it is hereby Ordered, Adjudged and Decreed that the Order, dated February 25, 2025, is hereby vacated and the Complaints filed at the above numbers are hereby reinstated. The record shall be marked as "open" and an Initial Telephonic Hearing shall be rescheduled at the convenience of the office of the Administrative Law Judge, as soon practically possible.

Dated: _____

Katrina L. Dunderdale
Administrative Law Judge

BEFORE THE
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AMERICA'S BEST VALUE INN

C-2024-3047802

C-2024-3047806

v.


PENNSYLVANIA AMERICAN
WATER COMPANY

NOTICE OF PRESENTATION

TO: Teresa K. Harold, Esq.
Michael A. Guin, Esq.

Kindly take notice that the attached Motion will be presented/delivered to the Office of the Administrative Law Judge on the 13th day of March, 2025 for disposition.

TURTURICE & ASSOCIATES, LLC

By: 

Lane M. Turturice, Esquire

Date: 3-13-25

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

AMERICA'S BEST VALUE INN

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C-2024-3047806

v.

PENNSYLVANIA AMERICAN
WATER COMPANY

MOTION FOR RECONSIDERATION AND
REQUEST TO VACATE ORDER

AND NOW, comes the Complainant, America's Best Value Inn, by and through its attorney, Lane M. Turturice, Esquire, who moves the Commission as follows:

1. The Complainant, America's Best Value Inn has filed Complaints against the Respondent, Pennsylvania American Water Company at the above mentioned docket numbers.

2. The Complainant, America's Best Value Inn had been proceeding

pro se in these matters, until the Administrative Law Judge issued an Order on January 30, 2025 directing that the Complainant retain a Pennsylvania Attorney to represent the Complainant in these proceedings before the Commission.

3. Due to family matters and other circumstances beyond the control of the Kishor Patel, the President of the Complainant, it was not able to secure Pennsylvania counsel in time in order to comply with the Order issued from the Administrative Law Judge.

4. As a result of the Complainant's failure to retain counsel, as directed the records of Complaints filed by the Complainant were deemed closed and it was directed that an Initial Decision in these matters be prepared and issued, without holding an Initial Hearing in these matters.

5. The Complainant seeks leave of the Commission so that its counsel may enter an Appearance and participate in the matter alongside the Complainant.

6. The Complainant respectfully requests that the Commission issue an Order vacating the Order of February 25, 2025, reinstate the Complaints in this matter and then schedule an Initial Hearing in these matters.

WHEREFORE, the Complainant moves the Commission to reconsider and vacate its Order and issue a subsequent order consistent with the relief requested herein.

Respectfully submitted,

TURTURICE & ASSOCIATES, LLC

By: 

LANE M. TURTURICE, ESQUIRE
Attorney for Complainant

CERTIFICATE OF SERVICE

I, Lane M. Turturice, Esquire, hereby certify that a true and correct copy of the foregoing Motion for Reconsideration and Request to Vacate Order was served upon the following parties via email on this 13th day of March, 2025.

TERESA K HARROLD COUNSEL
PENNSYLVANIA AMERICAN WATER COMPANY
852 WESLEY DRIVE
MECHANICSBURG PA 17055
teresa.harrold@amwater.com

MICHAEL A GRUIN ESQUIRE
STEVENS & LEE
17 NORTH SECOND STREET 16TH FLOOR
HARRISBURG PA 17101 717.255.7365 717.234.1090
michael.gruin@stevenslee.com

TURTURICE & ASSOCIATES, LLC

By: _____



Lane M. Turturice, Esquire
Attorney for Complainant