

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of The City of Lancaster – Water :
Bureau for Approval of A Lead Service :
Line Replacement Program and Related : **Docket No. P-2023-3041043**
Tariff Changes, Pursuant to 66 Pa. C.S.A. :
§ 1311(b) and 52 Pa. Code §§ 65.51, et seq. :
:

**MOTION FOR ADMISSION
OF TESTIMONY AND EXHIBITS**

TO THE HONORABLE JEFFREY WATSON, ADMINISTRATIVE LAW JUDGE:

The undersigned move for admission into the evidentiary record the statements and exhibits identified in the Stipulation for Admission of Testimony and Exhibits (“Stipulation”) attached hereto as Appendix A. This Motion and the Stipulation are being submitted in conjunction with the Joint Petition for Complete Settlement (“Joint Petition”) filed in this proceeding on April 9, 2025 and, specifically, Paragraph No. 60 thereof.

Pursuant to the Stipulation, all the parties to this proceeding have stipulated to the authenticity of the statements and exhibits listed therein and have waived cross-examination of the witnesses sponsoring those statements and exhibits, subject to the provisions of Paragraph Nos. 63 and 64 of the Joint Petition (which addresses further proceedings in the event the Commission were to disapprove the Settlement).

Accordingly, the parties to this proceeding request that Administrative Law Judge Jeffrey Watson grant this Motion and admit into the evidentiary record such statements and exhibits. Upon issuance of an Order granting this Motion, copies of the statements and exhibits listed in the Stipulation, together with verifications of all statements and exhibits, will be e-filed

with the Secretary of the Commission for entry into the evidentiary record in this case.

Respectfully submitted,

/s/ Shane P. Simon

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Attorneys for City of Lancaster – Water Bureau

Dated: April 9, 2025

/s/ Christy A. Appleby

Christy M. Appleby, Esq.

Counsel for Office of Consumer Advocate

/s/ Carrie B. Wright

Carrie B. Wright, Esq.

Counsel for Bureau of Investigation &
Enforcement

/s/ Steven C. Gray

Steven C. Gray, Esq.

Counsel for Office of Small Business Advocate

APPENDIX A

**STIPULATION FOR ADMISSION
OF TESTIMONY AND EXHIBITS**

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	:	

**STIPULATION FOR ADMISSION
OF TESTIMONY AND EXHIBITS**

On April 9, 2025, a Joint Petition for Complete Settlement (“Joint Petition”) was filed with the Pennsylvania Public Utility Commission (“Commission”) at the above-referenced docket. The undersigned, being all of the parties to this proceeding, hereby stipulate to the authenticity of the following testimony and exhibits (the “Listed Statements and Exhibits”):

- a. The City’s Petition, filed on May 31, 2023, with accompanying exhibits; and
- b. The Direct Testimony of Christine Volkay-Hilditch, P.E., BCEE, Deputy Director of Public Works of the City of Lancaster.

Additionally, the parties to this proceeding acknowledge and agree that they waive cross-examination with respect to the Listed Statements and Exhibits, subject to the exception stated in Paragraph Nos. 63 and 64 of the Joint Petition, if the Commission were to reject the Settlement, and further stipulate that the Listed Statements and Exhibits should be admitted into the record in this case by Motion.

Accordingly, this Stipulation for Admission of Testimony and Exhibits is hereby executed by counsel for the respective parties set forth below.

Respectfully submitted,

/s/ Shane P. Simon

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Dated: April 9, 2025

/s/ Christy A. Appleby

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/s/ Carrie B. Wright

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/s/ Steven C. Gray

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