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May 19, 2025

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 May 30, 2025 in this matter. 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)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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

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 May 30, 2025 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. The Telephonic Hearing was rescheduled for January 22, 2025, after PAWC filed a Motion for Continuance on October 29, 2024.

10. On January 9, 2025, PAWC filed another Motion requesting a Continuance of the Telephonic Hearing because its Preliminary Objections had not been resolved, or in the alternative, requesting that the Hearing be converted to a Prehearing Conference.

11. A Prehearing Conference was held on January 22, 2025, at which time the parties presented arguments in support of their position on the Preliminary Objections.

12. At the Prehearing Conference, the Complainant confirmed that she was not a customer of PAWC’s but stated that she was listed as a point of contact on an account that is in the name of Craig Stevens, and that the account in question is solely for an outside pump hydrant, rather than for domestic water service.

13. Shortly after the Prehearing Conference concluded, the Complainant filed an “Additional Amended Formal Complaint” for the sole purpose of “adding Craig

Stevens” to the complaint because he has similar concerns as she does about the impacts of gas drilling on water extracted from Lake Montrose in Montrose PA.

14. PAWC filed a Motion to Strike the “Additional Amended Formal Complaint”.

15. By Prehearing Order issued on May 12, 2025, a Telephonic Hearing in this matter was scheduled for May 30, 2025.

16. PAWC’s Preliminary Objections to the Amended Complaint are still pending and no order has been issued regarding either 1) the disposition of PAWC’s Preliminary Objections or 2) PAWC’s Motion to Strike the Additional Amended Formal Complaint.

17. Because PAWC’s Preliminary Objections and Motion to Strike have not been resolved yet, and because resolution of the Preliminary Objections and Motion to Strike 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 rulings on the Preliminary Objections and Motion to Strike are issued.

REQUEST FOR RELIEF

WHEREFORE, for all of the reasons stated herein, Pennsylvania-American Water Company respectfully requests that the May 30, 2025 hearing in this matter be continued, as set forth above, or in the alternative, converted to a prehearing conference.

Respectfully submitted,



Michael A. Green

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COUNSEL FOR PENNSYLVANIA
AMERICAN WATER COMPANY

DATE: May 19, 2025

**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 and Electronic Mail

Vera Scroggins
71 Gus Park Lane
Brackney, PA 18812



Michael A. Guin

DATED: May 19, 2025