

June 30, 2025

Via Electronic Filing

Matthew Homsher, Esquire
Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Docket Nos. F-2025-3054411 and F-2025-3054412
Eleanor Weaver v. Aqua Pennsylvania, Inc.
Motion to Consolidate of Aqua**

Dear Secretary Homsher:

Attached for filing is the Motion of Aqua Pennsylvania, Inc. to consolidate the Formal Complaints of Eleanor Weaver at Docket Nos. F-2025-3054411 and F-2025-3054412.

A copy of the attached Motion to Consolidate has been provided to the Complainant in the manner indicated on the attached Certificate of Service.

If there are any questions, please do not hesitate to contact me.

Very truly yours,

Reger Rizzo & Darnall LLP



Margaret A. Morris

MAM/co
Enclosures

cc: Mediator Cynthia Lehman, PA Public Utility Commission [w/encls.]
Heather S.D. Harrison, Aqua Pennsylvania, Inc. [w/encls.]
Eleanor Weaver [w/encls.]

**Re: Docket Nos. F-2025-3054411 and F-2025-3054412
Eleanor Weaver v. Aqua Pennsylvania, Inc.
Motion to Consolidate of Aqua**

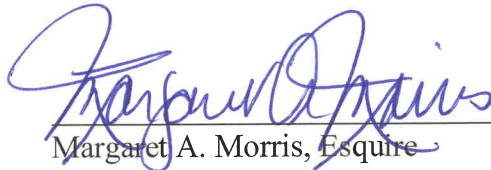
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served upon the following person(s), in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Via Electronic Mail

Eleanor Weaver
pssunegotiator@yahoo.com

Dated: June 30, 2025



Margaret A. Morris, Esquire

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ELEANOR WEAVER	:	
	:	Docket Nos. F-2025-3054411
v.	:	F-2025-3054412
	:	
AQUA PENNSYLVANIA, INC.	:	

NOTICE TO PLEAD

Pursuant to 52 Pa. Code § 5.103, you are hereby notified that if you do not file a written response to the enclosed Motion to Consolidate of Aqua Pennsylvania, Inc., within twenty (20) days from service of this Notice, the facts set forth by Aqua Pennsylvania, Inc. in the Motion to Consolidate may be deemed to be true, whereby requiring no other proof. All pleadings, such as Answer to Motion to Consolidate, must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy served to counsel for Aqua Pennsylvania, Inc., Margaret A. Morris, Esq., and where applicable the Administrative Law Judge presiding over the issue.

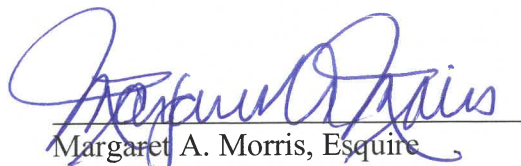
File by Mail or e-filing with:

Matthew Homsher, Esquire
Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

With a copy to:

Margaret A. Morris, Esquire
Reger Rizzo & Darnall LLP
Cira Centre, 13th Floor
2929 Arch Street
Philadelphia, PA 19104
mmorris@regerlaw.com

Date: June 30, 2025



Margaret A. Morris, Esquire
Attorney ID No. 75048
Reger Rizzo & Darnall LLP
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(215) 495-6524 (tel.)
mmorris@regerlaw.com

Counsel for Aqua Pennsylvania, Inc.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ELEANOR WEAVER	:	
	:	Docket Nos. F-2025-3054411
v.	:	F-2025-3054412
	:	
AQUA PENNSYLVANIA, INC.	:	

MOTION OF AQUA PENNSYLVANIA, INC. TO CONSOLIDATE FORMAL COMPLAINTS FILED BY ELEANOR WEAVER

Aqua Pennsylvania, Inc. (Respondent, Aqua or Company), by and through its attorneys, Reger Rizzo & Darnall LLP, hereby submits its Motion to Consolidate the Formal Complaints of Eleanor Weaver (Complainant) filed in the above-captioned dockets with the Pennsylvania Public Utility Commission (Commission), pursuant the Commission’s regulations, 52 Pa. Code §§ 5.103 and 5.81. In response thereto, the Respondent avers and represents as follows:

I. BACKGROUND

1. On March 31, 2025, Complainant filed a Formal Complaint with the Commission at Docket No. F-2025-3054411 (First Complaint) regarding service to 135 Point Road, West Hickory, Pennsylvania 16370 under Account No. 002936620-1575356 (Point Road Account) and checked the boxes on the formal complaint form indicating that there are incorrect charges on the Point Road Account and she is experiencing a reliability, safety or quality problem with the water service provided.

2. On April 1, 2025, Complainant filed a Formal Complaint with the Commission at Docket No. F-2025-3054412 (Second Complaint) regarding service to 3480 Main Street, West Hickory, Pennsylvania 16370 under Account No. 002936496-1575232 (Main St. Account) and

checked the boxes on the formal complaint form indicating that there are incorrect charges on the Main St. Account and she is experiencing a reliability, safety or quality problem with the water service provided

3. On April 23, 2025, pursuant to 52 Pa. Code § 5.62, the Company filed its responsive Answers in each respective docket, denying the material allegations therein.

4. By Interim Order, dated May 19, 2025, each respective Complaint was sent to mediation with Cynthia Lehman assigned as the Mediator.

II. CONSOLIDATION

5. Section 5.81 of the Commission’s regulations, 52 Pa. Code § 5.81, allows the Commission or the presiding officer to order the consolidation of proceedings “involving a common question of law or fact.” Both the First and Second Formal Complaints contain identical issues of law and fact, which, in order to further judicial economy and avoid needless duplication of litigation, justify consolidation.

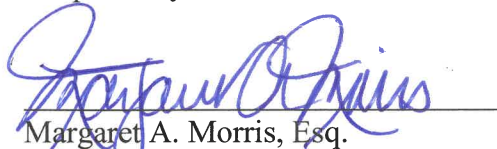
6. Although the First and Second Formal Complaints involve different service locations, the dispute in each Formal Complaint raises the identical issues. The Complainant alleges that the Company is charging more than the rates authorized, Aqua’s bills are confusing, there have been boil or discolored water advisories, and the Company damaged a Township Road. First Formal Complaint at ¶ 4; Second Formal Complaint at ¶ 4.

7. Mediator Lehman and the Commission have significant discretion in deciding a Motion to Consolidate Proceedings. Consolidation of these proceedings will avoid: (i) the need to appoint a separate administrative law judge to preside over both Formal Complaints; (ii) participation by the parties in two separate proceedings on identical issues; and (iii) duplication of witnesses, discovery, testimony, and cross-examination. Moreover, consolidation of the

Formal Complaints for hearing and decision will avoid the potential for inconsistent decisions due to separate treatment in different proceedings, which ultimately may require Commission resolution. Basic principles of judicial economy, the avoidance of needless duplication of litigation and a desire to save Commission, and the parties' resources, all support consolidation of these proceedings

WHEREFORE, for the foregoing reasons, Aqua Pennsylvania, Inc., respectfully requests that its Motion to Consolidate the Formal Complaints filed by Eleanor Weaver at Docket Nos. F-2025-3054411 and F-2025-3054412 be granted.

Respectfully submitted,



Margaret A. Morris, Esq.

Attorney ID No. 75048

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Philadelphia, PA 19104

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Dated: June 30, 2025

Counsel for Aqua Pennsylvania, Inc.