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October 14, 2025

Via Electronic Filing

Matthew L. Homsher, Secretary
Pa. Public Utility Commission
400 North Street
Harrisburg, PA 17120

Re: Harry Bolton v. The Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water,
Docket No. C-2025-3056203

Dear Secretary Homsher:

Enclosed for electronic filing please find The Pittsburgh Water and Sewer Authority's ("Pittsburgh Water") Motion for Continuance with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

A handwritten signature in black ink that reads "Lauren M. Burge". The signature is written in a cursive, flowing style.

Lauren M. Burge

Enclosure

cc: Cert. of Service w/enc.

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of Pittsburgh Water's Motion for Continuance upon the person listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via First Class Mail

Harry Bolton
318 Johnston Avenue
Pittsburgh, PA 15207

Via Email

Hon. Emily I. DeVoe
Office of Administrative Law Judge
Pennsylvania Public Utility Commission
301 5th Avenue, Suite 220
Pittsburgh, PA 15222
edevoe@pa.gov

Date: October 14, 2025



Lauren M. Burge, Esquire

*Counsel for
The Pittsburgh Water and Sewer Authority
d/b/a Pittsburgh Water*

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Harry Bolton,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2025-3056203
	:	
	:	
The Pittsburgh Water and Sewer Authority	:	
d/b/a Pittsburgh Water,	:	
	:	
Respondent.	:	

NOTICE TO PLEAD

To: Harry Bolton
318 Johnston Avenue
Pittsburgh, PA 15207

You are hereby notified that a reply to the enclosed **Motion for Continuance** of The Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water (“Pittsburgh Water”) must be filed within 20 days or such shorter time period as may be established by the Administrative Law Judge. All pleadings, such as a response to a Motion for Continuance, must be filed with the Secretary of the Pennsylvania Public Utility Commission with a copy served to counsel for Pittsburgh Water and the ALJ.

File with:

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

With a copy to:

Lauren M. Burge, Esquire
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Bryce R. Beard, Esquire
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Lauren M. Burge, Esquire

Date: October 14, 2025

*Counsel for The Pittsburgh Water and Sewer
Authority d/b/a Pittsburgh Water*

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Harry Bolton,	:	
	:	
Complainant,	:	
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v.	:	Docket No. C-2025-3056203
	:	
The Pittsburgh Water and Sewer Authority	:	
d/b/a Pittsburgh Water,	:	
	:	
Respondent.	:	

**THE PITTSBURGH WATER AND SEWER AUTHORITY’S
MOTION FOR CONTINUANCE OF HEARING**

Pursuant to the regulations of the Pennsylvania Public Utility Commission (“Commission” or “PUC”) at 52 Pa. Code § 1.15(b) and in accordance with the Prehearing Order dated August 21, 2025 issued by Administrative Law Judge Emily I. DeVoe (“ALJ”), The Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water (“Pittsburgh Water”) submits this Motion for Continuance of the evidentiary hearing scheduled for October 28, 2025 regarding the Formal Complaint of Harry Bolton (“Mr. Bolton” or “Complainant”).

On October 9, 2025, undersigned counsel for Pittsburgh Water contacted Mr. Bolton to discuss Pittsburgh Water’s need for a continuance of the October 28, 2025 hearing. Mr. Bolton indicated that he opposes Pittsburgh Water’s request. As such, Pittsburgh Water requests that Your Honor waive the response time set forth under 52 Pa. Code § 5.103 and grant this motion expeditiously and in advance of the hearing scheduled for October 28, 2025 so that it can be rescheduled at Your Honor’s earliest convenience as provided below.

In support of this Motion, Pittsburgh Water avers as follows:

I. BACKGROUND

1. The Complainant filed a Formal Complaint against Pittsburgh Water with the Commission, which was served on Pittsburgh Water on July 9, 2025. In the Complaint, Mr. Bolton

objects to Pittsburgh Water’s proposed rate increase filed with the Commission on June 4, 2025. The Complaint does not allege any specific service issues, but instead generally opposes the proposed rate increase.¹ The Complainant further indicated that he is in need of a payment plan.²

2. On July 30, 2025, ALJ DeVoe issued an Interim Order directing that Mr. Bolton file correspondence by August 6, 2025 clarifying whether he wanted his Complaint to be treated as a stand-alone Complaint seeking a payment arrangement or a rate complaint to be consolidated with Pittsburgh Water’s rate filing. Mr. Bolton did not file the required correspondence by August 6, 2025.

3. On August 19, 2025, ALJ DeVoe issued an Interim Order stating that the Complaint will be treated as a stand-alone Complaint seeking a payment arrangement and required that Pittsburgh Water file a responsive pleading to the Formal Complaint by September 8, 2025.

4. Pittsburgh Water filed an Answer to the Formal Complaint on September 8, 2025 requesting that the Complaint be dismissed, because: (1) to the extent the Complainant disputes the proposed rate increase, that issue should be addressed as part of the consolidated proceedings currently pending before the Commission at Docket Nos. R-2025-3055010 (water), R-2025-3055011 (wastewater), and R-2025-3055012 (stormwater); and (2) although Mr. Bolton indicates that he is seeking a payment arrangement, Pittsburgh Water’s records confirm that Mr. Bolton’s account is current and carries no past due balance.

5. On October 3, 2025, Pittsburgh Water filed a Withdrawal and Entry of Appearance, withdrawing the appearance of Conor D. Farley, Esquire, and entering the appearance of Lauren M. Burge, Esquire and Bryce R. Beard, Esquire, as counsel on behalf of Pittsburgh Water.

¹ Complaint, ¶ 4.

² Complaint, ¶ 4.

6. A hearing is currently scheduled for October 28, 2025 before ALJ DeVoe.

7. By this Motion, Pittsburgh Water respectfully requests a continuance of the hearing due to unavailability of counsel.

8. Pittsburgh Water has consulted with Mr. Bolton who stated that he **opposes** the request.

II. APPLICABLE LEGAL STANDARDS

9. The Commission's Rules of Administrative Practice and Procedure permit parties to file requests for continuance of a hearing. Requests for continuance will be considered for good cause shown, and should be filed at least 5 days prior to the hearing date. 52 Pa. Code § 1.15(b).

10. Similarly, the Prehearing Order dated August 21, 2025 that was issued in this proceeding provides that a continuance may be requested if a party has a good reason, and that continuances will be granted only for good cause. The Prehearing Order further notes that to request a continuance, a party must submit a motion at least 5 days before the hearing, which includes the case name, case number and hearing date; the reason for the request; and an indication of whether the other party agrees to the request.

III. REASON FOR REQUEST

11. On October 3, 2025, Pittsburgh Water withdrew the appearance of Conor D. Farley, its original counsel in this proceeding, as Mr. Farley is no longer with Pittsburgh Water. On that date, Pittsburgh Water entered the appearance of Lauren M. Burge and Bryce R. Beard as its new counsel in this proceeding.

12. Pittsburgh Water's new counsel has a conflict with the current October 28, 2025 hearing date, as both counsel will be travelling on business on that date.

13. Pittsburgh Water submits that new counsel's unavailability on October 28, 2025 is good cause for a continuance of the hearing date.

14. Pittsburgh Water proposes to reschedule the hearing on November 5 or November 12, 2025. In the alternative, Pittsburgh Water can also be available on November 4, November 14, or November 17, 2025. Pittsburgh Water also proposes that hearing exhibits be due at least 5 business days before the rescheduled evidentiary hearing, consistent with the August 21, 2025 Prehearing Order.

15. Pittsburgh Water submits that the reason for the requested continuance establishes good cause for the hearing to be rescheduled. Pittsburgh Water also notes that this request was made more than 5 days prior to the hearing date. Further, the proposed rescheduled hearing dates are shortly after the current hearing date and will not cause significant delay in the resolution of this matter.

CONCLUSION

WHEREFORE, Pittsburgh Water respectfully requests that ALJ DeVoe grant this Motion for Continuance and reschedule the hearing on the Formal Complaint as described herein.

Respectfully submitted,



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Date: October 14, 2025

*Counsel for The Pittsburgh Water and Sewer
Authority d/b/a Pittsburgh Water*

Verification

I, Lauren M. Burge, am counsel for The Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water (“Pittsburgh Water”), and I hereby state that the facts set forth in the foregoing **Motion for Continuance** are true and correct to the best of my knowledge, information and belief. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Dated: October 14, 2025



Lauren M. Burge