

MARK J. SHAW, ESQ.
ADMITTED IN PA AND OH
DIRECT DIAL 814-870-7607
E-MAIL: MSHAW@MIJB.COM

February 6, 2026

VIA ELECTRONIC SUBMISSION

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

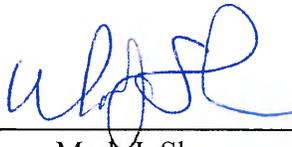
Re: Pennsylvania PUC, Bureau of Investigation and Enforcement v. Conneaut Lake Park
Water Corporation, Inc.
Docket Nos. P-2024-3051855 and I-2024-3051857

Dear Secretary Homsher:

Attached please find the Joint Motion to Amend Litigation Schedule in the above-captioned proceeding.

Very truly yours,

MacDONALD, ILLIG, JONES & BRITTON LLP

By  _____
Mark J. Shaw

MJS/nes/4897-6183-5403 v.1

Attachments

cc: ALJ Eranda Vero (*via e-mail*)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	P-2024-3051855
Bureau of Investigation and Enforcement	:	I-2024-3051857
	:	
v.	:	
	:	
Conneaut Lake Park Water Corporation, Inc.	:	

JOINT MOTION TO AMEND LITIGATION SCHEDULE

Conneaut Lake Park Water Corporation, Inc. ("CLPWC"), by and through its undersigned counsel, together with the Pennsylvania PUC Bureau of Investigation and Enforcement ("BI&E"), the Office of Consumer Advocate ("OCA"), the Office of Small Business Advocate ("OSBA") and Aqua Pennsylvania, Inc. ("Aqua") and their undersigned counsel hereby file this Joint Motion to Amend Litigation Schedule and the following in support thereof:

1. The parties are jointly submitting this proposed amendment.
2. In its Prehearing Order #3, dated November 5, 2025, Administrative Law Judge

Eranda Vero issued the following Litigation Schedule:

Public Input Hearings – Week of January 19, 2026 (one telephonic and one in person)
Direct Testimony - Friday, February 20, 2026
Rebuttal Testimony - March 16, 2026
Surrebuttal testimony - April 6, 2026
Written Rejoinder - April 20, 2026
Evidentiary Hearings - Week of April 20, 2026 (four days, in-person, in Harrisburg)
Main Briefs - May 13, 2026
Reply Briefs - May 27, 2026

3. Subsequent to that date, the parties have engaged in written discovery with CLPWC responding to BI&E Set 2 and OCA Sets 15 through 22.

4. As indicated during the prehearing conference, CLPWC retained the services of an engineer who specializes in water systems to conduct a thorough evaluation of the CLPWC system, including the treatment plant, the water tower and the distribution system.

5. CLPWC avers that as part of that evaluation, the engineer hired a company that specialized in evaluations of water tanks to inspect the water tower at CLPWC, but the inspection company indicated it would not be available for 6-8 weeks to conduct the water tower inspection.

6. On January 21, 2026, CLPWC hosted an inspection of the treatment plant and water tower that was attended by counsel for CLPWC, BI&E, and OCA, two operators for CLPWC, the engineer for CLPWC and an engineer for BI&E.

7. CLPWC avers that the day before the treatment plant inspection, CLPWC was informed that the tank inspector would conduct its inspection of the water tower on January 28, 2026.

8. On January 21, 2026, public input hearings were held both in person and by telephone.

9. Currently, direct testimony is due on Friday, February 20, 2026.

10. CLPWC avers that the water tank inspection company conducted and completed its inspection on January 28, 2026, and will be preparing a report.

11. CLPWC avers that the engineer hired by CLPWC has completed his evaluation and is in the process of drafting his report.

12. CLPWC believes it will be receiving final reports from its inspectors within the next couple of weeks, which would put it around the time direct testimony currently is due. Upon receipt, CLPWC will distribute those final reports to the parties.

13. The parties agree that review of the engineer and tank inspection reports prior to the submission of the direct testimony would be relevant for their experts as part of their evaluation of the CLPWC system.

14. The parties discussed options to modify the Litigation Schedule and agreed that a 2-week extension was the only viable option for the parties given everyone's current schedules.

15. Consistent with this discussion, the parties propose the following revised Litigation Schedule:

Direct	3/6/26
Rebuttal	3/30/26
Surrebuttal	4/20/26
Rejoinder	5/4/26
Hearings	5/4/26-5/5/26
Main Briefs	5/27/26
Reply Briefs	6/10/26

WHEREFORE, the parties jointly respectfully request that this Court amend the Litigation Schedule in Prehearing Order #3 to the above schedule.

Respectfully submitted,

/s/ Mark J. Shaw

Mark J. Shaw, Esq.

MacDONALD, ILLIG, JONES & BRITTON LLP

100 State Street, Suite 700

Erie, Pennsylvania 16507-1459

(814) 870-7607

Attorneys for Defendant

Conneaut Lake Park Water Corporation

/s/ Harrison W. Breitman
Harrison W. Breitman, Esq.
Ryan Morden, Esq.
Janna Williams, Esq.
Office of Consumer Advocate
555 Walnut Street 5th
Floor Forum Place
Harrisburg, PA 17101

Attorneys for Office of Consumer Advocate

/s/ Michael Podskoch
Michael Podskoch, Esq.
Adam J. Williams, Esq.
PA PUC BIE Legal Technical
Second Floor West
400 North Street
Harrisburg, PA 17120

Attorneys for Plaintiff
Bureau of Investigation and Enforcement

/s/ Rebecca Lyttle
Rebecca Lyttle, Esq.
Assistant Small Business Advocate
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101

Attorneys for Office of Small Business
Advocate

/s/ John Povilaitis
John Povilaitis, Esq.
Alan Seltzer, Esq.
Buchanan Ingersoll & Rooney PC
409 North Second Street, Suite 500
Harrisburg, PA 17101-1357

Attorneys for Aqua Pennsylvania