



August 10, 2026

VIA EFILING

Dawn Kurtz Crompton

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Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
400 North Street, 2nd Floor (Filing Room)
Harrisburg, PA 17120

Re: Office of Small Business Advocate and Office of Consumer Advocate v. Veolia Water
Pennsylvania, Inc.; Docket Nos. C-2025-3058757 and C-2025-3058865

**Joint Motion to Stay the Proceeding by the Office of Small Business Advocate, the
Office of Consumer Advocate, and Veolia Water Pennsylvania, Inc.**

Dear Secretary Homsher:

“On behalf of Veolia Water Pennsylvania, Inc., the Office of Small Business Advocate, the
Office of Consumer Advocate, enclosed please find the **Joint Motion to Stay the Proceeding
by the Office of Small Business Advocate, the Office of Consumer Advocate, and Veolia
Water Pennsylvania, Inc.** Copies have been served as shown on the attached Certificate of
Service.

If you have any questions, please feel free to contact me.

Sincerely,
Cozen O'Connor

A handwritten signature in blue ink, appearing to read 'DKC', followed by a long horizontal flourish.

By: Dawn Kurtz Crompton, Esq. (#311701)
Counsel for *Veolia Water Pennsylvania, Inc.*

DKC
Enclosures

cc: Administrative Law Judge Chad Allensworth
Per Certificate of Service
Phoebe Youhanna, Esq., Veolia North America
Michael Corona, Esq., Veolia North America
Larry Finnicum, Regional President, VWPA

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Office of Small Business Advocate
and Office of Consumer Advocate

v.

Veolia Water Pennsylvania, Inc.

:
:
:
:
:

Docket Nos.

C-2025-3058757

C-2025-3058865

CERTIFICATE OF SERVICE

I hereby certify that I have this 10th day of August, 2026 served a true copy of the foregoing **JOINT MOTION TO STAY THE PROCEEDING BY OFFICE OF SMALL BUSINESS ADVOCATE, OFFICE OF CONSUMER ADVOCATE, AND VEOLIA WATER PENNSYLVANIA, INC.** upon the parties, listed below and in the manner described below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

Via E-mail and First Class Mail

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Respectfully submitted,



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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Office of Small Business Advocate	:	
and Office of Consumer Advocate	:	
	:	Docket Nos.
v.	:	C-2025-3058757
	:	C-2025-3058865
Veolia Water Pennsylvania, Inc.	:	

**JOINT MOTION TO STAY THE PROCEEDING
BY THE OFFICE OF SMALL BUSINESS ADVOCATE,
THE OFFICE OF CONSUMER ADVOCATE, AND
VEOLIA WATER PENNSYLVANIA, INC.**

AND NOW COME the Office of Small Business Advocate (“OSBA”), the Office of Consumer Advocate (“OCA”), and Veolia Water Pennsylvania Inc. (“VWPA” or the “Company,” together with the OSBA and the OCA, the “Moving Parties”), by their respective attorneys, to submit this Joint Motion to Stay the Proceeding (“Joint Motion”). In support of their Joint Motion, the Moving Parties submit as follows:

1. By and through this Joint Motion, the Moving Parties request that this proceeding be stayed to allow the parties to engage in focused settlement discussions.

2. The requested stay would suspend all pending deadlines in this matter, including (i) the OCA’s pending Objections to VWPA’s Set 1 Discovery and VWPA response(s) to those Objections, (ii) the August 10 exhibit objection deadline, (iii) the August 31 Direct Testimony deadlines, as well as (iv) all other deadlines in the litigation schedule.

3. The Moving Parties further agree to provide Administrative Law Judge (“ALJ”) Chad Allensworth with informal joint status updates via email every thirty (30) days in connection

with this proceeding. Should settlement negotiations prove unsuccessful, the Moving Parties would promptly advise ALJ Allensworth and propose a revised litigation schedule.

4. The Pennsylvania Public Utility Commission's policy is to encourage settlements pursuant to 52 Pa. Code § 5.231(a). Moreover, a stay of the proceeding while the parties assess settlement will promote judicial economy and conserve judicial resources.

WHEREFORE, the Office of Small Business Advocate, the Office of Consumer Advocate and Veolia Water Pennsylvania jointly and respectfully request that ALJ Allensworth grant this Joint Motion to Stay the Proceeding as aforesaid.

**THE OFFICE OF
SMALL BUSINESS ADVOCATE**

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**THE OFFICE OF
CONSUMER ADVOCATE**

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**VEOLIA WATER PENNSYLVANIA,
INC.**

By: 

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Dated: August 10, 2026