

**COMMONWEALTH OF PENNSYLVANIA
BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	Commission Docket No.:
Bureau of Investigation and Enforcement,	:	P-2017-2594688
	:	
v.	:	
	:	
Metropolitan Edison Company and	:	
North Heidelberg Sewer Company	:	

**North Heidelberg Sewer Company's
Exceptions to the Recommended Decision of ALJ Barnes**

Pursuant to 52 Pa. Code §5.533, North Heidelberg Sewer Company ("NHSC"), through its undersigned counsel, files these exceptions to the Recommended Decision of Administrative Law Judge Elizabeth Barnes ("ALJ Barnes"), which was issued on April 11, 2017, in the above captioned matter.

I. Exceptions to Ordering Paragraphs Nos. 3 and 4

Ordering paragraphs numbers 3 and 4 of the recommended decision attempt to develop a payment plan under which NHSC is expected to make payments to lower its arrearage balance owed to Metropolitan Edison Company ("Met-Ed"). ALJ Barnes recommends that NHSC be directed to pay a lump sum amount of \$67,500 within sixty (60) days of the date of entry of a final Commission Order at docket number P-2017-2594688. Additionally, NHSC is directed to continue to make its monthly EDC and EGS consumption charges along with an additional monthly payment of \$ 2,812.50. Failure to abide by these provisions would see the Commission initiating a proceeding under 66 Pa. C.S. §529. *Recommended Decision*, p. 23.

NHSC takes exception to these recommended orders, and believes that these arrangements are unreasonable. A review of Met-Ed Exhibit 2 reveals that from March 11, 2013, until March 23, 2017, Met-Ed has assessed approximately \$88,592.09 in late fees, while only assessing approximately \$80,237.00 to EDC and EGS consumption charges. During that time, NHSC remitted approximately \$71,552.93 in payments. Absent these late payment charges, NHSC's arrearage balance would total approximately \$8,684.07. However, as it stands, over half of the outstanding balance is made up of late payment charges.

NHSC is cognizant of its responsibility to meet its financial obligations. However, Met-Ed now seeks to extract a lump-sum payment amount on a time frame that is not realistic. NHSC proposes that the Commission direct Met-Ed to cease assessing further late payment charges provided NHSC continues to pay in full its monthly EDC and EGS consumption charges. NHSC also asks the Commission to modify the proposed lump-sum payment amount to an number that more fairly reflects NHSC's ability to pay.

Wherefore, North Heidelberg Sewer Company respectfully requests that this honorable Commission modify the recommended decision of ALJ Barnes.

Date: 4/17/2017

Respectfully submitted,

_____/s/_____
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Certificate of Service

Pursuant to the Commission's Rules of Procedure, I hereby certify that on this date I served the following parties with North Heidelberg Sewer Company's *Affidavit of Joseph M. Aichholz Jr. on Behalf of North Heidelberg Sewer Company* and attachments via the means listed below:

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PO BOX 3265
HARRISBURG PA 17105-3265

Date: 4/17/2017

Respectfully submitted,

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