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June 20, 2013

VIA eFILE

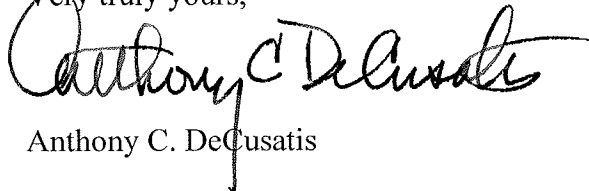
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: S. Stockton Alloway v. Pennsylvania-American Water Company
Docket No. C-2013-2366239

Dear Secretary Chiavetta:

Enclosed is the **Motion of Pennsylvania-American Water Company to Consolidate the Complaint of S. Stockton Alloway in the above-referenced matter with the Rate Investigation at Docket No. R-2013-2355276** (the "Motion"). Copies of the Motion will be served on all persons listed on the attached Certificate of Service in the manner indicated.

Very truly yours,



Anthony C. DeCusatis

ACD/tp
Enclosures

c: Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

S. STOCKTON ALLOWAY	:	
	:	
v.	:	
	:	DOCKET NO. C-2013-2366239
	:	
PENNSYLVANIA-AMERICAN WATER COMPANY	:	
	:	

CERTIFICATE OF SERVICE

I hereby certify that I have served copies of the foregoing **Motion of Pennsylvania-American Water Company to Consolidate the Complaint of S. Stockton Alloway with Rate Investigation at Docket No. R-2013-2355276** upon the following persons in the manner indicated in accordance with the requirements of 52 Pa. Code § 1.54:

VIA FIRST CLASS MAIL

S. Stockton Alloway
755 Main Street
Parkesburg, PA 19365

VIA ELECTRONIC AND FIRST CLASS MAIL

The Honorable Angela T. Jones
Administrative Law Judge
Pennsylvania Public Utility Commission
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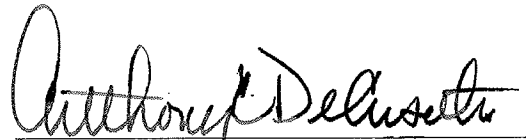
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Date: June 20, 2013



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*Counsel for Pennsylvania-American
Water Company*

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

S. STOCKTON ALLOWAY	:	
Complainant	:	
	:	
v.	:	DOCKET NO. C-2013-2366239
	:	
PENNSYLVANIA-AMERICAN WATER	:	
COMPANY	:	
Respondent	:	

NOTICE TO PLEAD

To: S. Stockton Alloway

You are hereby notified to file a written response to the attached within twenty (20) days from the date of service of this notice. If you do not file a written response denying or correcting the enclosed Motion within twenty (20) days of service, the facts set forth by Pennsylvania-American Water Company may be deemed to be true, thereby requiring no other proof, and judgment may be entered against you. All pleadings, such as responses to Motions, must be filed with the Secretary of the Pennsylvania Public Utility Commission:

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Second Floor
Harrisburg, PA 17120

You must also serve a copy of your response on the undersigned counsel for Pennsylvania-American Water Company. Failure to respond to this Motion could result in the dismissal of your case.

Anthony C. DeCusatis
Attorney I.D. No. 25700
Morgan, Lewis & Bockius LLP
1701 Market Street
Philadelphia, PA 19103-2921

Counsel for Pennsylvania-American Water
Company

Dated: June 20, 2013

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

S. STOCKTON ALLOWAY	:	
Complainant	:	
	:	
v.	:	DOCKET NO. C-2013-2366239
	:	
PENNSYLVANIA-AMERICAN WATER COMPANY	:	
Respondent	:	

**MOTION OF PENNSYLVANIA-AMERICAN WATER COMPANY
TO CONSOLIDATE THE COMPLAINT OF S. STOCKTON ALLOWAY
WITH THE RATE INVESTIGATION AT DOCKET NO. R-2013-2355276**

Pursuant to 52 Pa. Code § 5.103(a) Pennsylvania-American Water Company (“PAWC” of the “Company”) hereby requests that the Complaint (“Complaint”) filed by S. Stockton Alloway (“Complainant”) at the above-referenced docket be consolidated with the Pennsylvania Public Utility Commission’s investigation of PAWC’s existing and proposed water and wastewater rates at Docket No. R-2013-2355276.

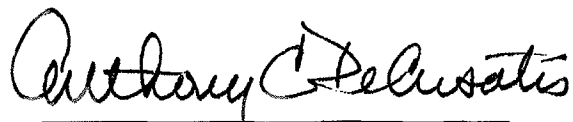
1. On May 31, 2013, the Commission served the Complaint upon PAWC.
2. Contemporaneously with the filing of this Motion, PAWC is filing an Answer to the Complaint.
3. The Complaint takes issue with the Company’s existing rate for residential wastewater service furnished to Complainant by PAWC’s Coatesville wastewater operations. Specifically, Complainant avers that the existing flat rate for unmetered wastewater service is “unfair” to him as a “single person living in a single family dwelling” and requests that the Commission require PAWC to revise the design of that rate to incorporate a “sliding scale” based on “how many people occupy a house.”

4. On April 30, 2013, the Company filed a general base rate case for its water and wastewater operations, which was docketed at R-2013-2355276. On June 16, 2013, the Commission issued an order initiating an investigation of the Company's existing and proposed rates and assigned the case to Administrative Law Judges Angela T. Jones and Darlene D. Heap.

5. The Complaint addresses a rate design issue that is within the scope of the Commission's investigation of the Company's pending base rate case, which, as previously noted, encompasses the Company's existing and proposed water and wastewater rates. Conducting parallel proceedings that address fundamentally similar issues is administratively inefficient, imposes unnecessary costs, and creates the possibility of inconsistent results. Moreover, because the resolution of the Complaint at this docket could potentially apply to the entire customer class of which Complainant is a member, it is more appropriate to address issues of that scope within the context of a general base rate proceeding. Accordingly, the Complaint properly should be consolidated with the Commission's investigation at Docket No. R-2013-2355276.

WHEREFORE, for the foregoing reasons, the Complaint of S. Stockton Alloway, if not denied in its entirety based on the Company's Answer that is being filed contemporaneously with this Motion, should be consolidated with the Commission's investigation at Docket No. R-2013-2355276.

Respectfully submitted,



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Water Company*

Dated: June 20, 2013