

SALTZ MATKOV P.C.

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Insurance Company of
Greater New York, a/s/o
Quail Run Real Estate L.P.
d/b/a Quail Run Apartments

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

INSURANCE COMPANY OF GREATER :
NEW YORK A/S/O QUAIL RUN REAL ESTATE :
L.P. D/B/A QUAIL RUN APARTMENTS :

Complainant, :

v. :

UNITED WATER COMPANY :

Respondent. :

NO.: C-2013-2393832

**RESPONSE OF COMPLAINANT, INSURANCE COMPANY OF GREATER NEW YORK
A/S/O QUAIL RUN REAL ESTATE L.P. D/B/A QUAIL RUN APARTMENTS, TO
NEW MATTER OF RESPONDENT, UNITED WATER COMPANY**

Complainant, Insurance Company of Greater New York a/s/o Quail Run Real Estate L.P.
d/b/a Quail Run Apartments (“Complainant”), by its counsel Saltz Matkov P.C., hereby files the
following Response to the New Matter of Respondent United Water Company:

NEW MATTER

20. This is an incorporation paragraph to which no responsive pleading is required.

21. Denied. This allegation states a conclusion of law to which no response is required.

Moreover, 66 Pa. C.S. Section 1501 is a document which, being in writing, speaks for itself.

22. Denied. This allegation states a conclusion of law to which no response is required.

Moreover, 52 Pa. Code and the Commission regulations are documents which, being in writing,
speak for themselves.

23. Denied. This allegation states a conclusion of law to which no response is required. To the extent the averment is deemed factual, the same is denied and strict proof thereof is demanded at the time of hearing and/or trial.

24. Denied. This allegation states a conclusion of law to which no response is required. Moreover, Pa. P.U.C. No. 7 (Tariff”) is a document which, being in writing, speaks for itself.

25. Denied. This allegation states a conclusion of law to which no response is required. Moreover, Pa. P.U.C. No. 7 (Tariff”) is a document which, being in writing, speaks for itself.

26. Denied. This allegation states a conclusion of law to which no response is required. Moreover, PPL Elec. Util. Corp. v. Pa. P.U.C., 912 A.2d 386,402 (Pa. Comwlth 2006) is an opinion which, being in writing, speaks for itself.

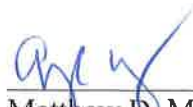
27. Denied. This allegation states a conclusion of law to which no response is required. To the extent the averment is deemed factual, the same is denied and strict proof thereof is demanded at the time of hearing and/or trial.

28. Denied. This allegation states a conclusion of law to which no response is required. To the extent the averment is deemed factual, the same is denied and strict proof thereof is demanded at the time of hearing and/or trial.

29. Denied. This allegation states a conclusion of law to which no response is required. Moreover, 52 Pa. Code Section 69.87 is a document which, being in writing, speaks for itself.

WHEREFORE, the Complainant, Insurance Company of Greater New York, a/s/o Quail Run Real Estate L.P. d/b/a Quail Run Apartments respectfully requests that the Pennsylvania Public Utility Commission find in its favor and against Respondent United Water Company and grant such other relief as may be just, reasonable and consistent with the Public Utility Code.

Respectfully Submitted,



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Dated: January 2, 2014

VERIFICATION

I, Gary L. Bailey, Esquire, hereby state and verify that I am the attorney for the Insurance Company of Greater New York a/s/o Quail Run Real Estate L.P. d/b/a Quail Run Apartments; and that the statements made in the foregoing pleadings are true and correct to the best of my knowledge, information and belief. I understand that the statements therein are made subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities.



Gary L. Bailey

Dated: January 2, 2014

CERTIFICATE OF SERVICE

I, Gary L. Bailey, Esquire, hereby certify that a true and correct copy of *Response of Complainant to New Matter of Respondent United Water* was served via certified mail on this 2nd day of January, 2014 upon the following:

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