



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE  
REFER TO OUR FILE

July 28, 2014

Rosemary Chiavetta  
Pa. Public Utility Commission  
2<sup>nd</sup> Floor, 400 North Street  
P.O. Box 3265  
Harrisburg, PA 17105

Re: Pennsylvania Public Utility Commission, Bureau of Investigation and  
Enforcement v. Snyder Brothers, Inc.; Docket No. C-2014-2402746

Dear Secretary Chiavetta:

Pursuant to the provisions of 52 Pa. Code § 5.102, please accept for filing the Bureau of Investigation and Enforcement's Answer and Supporting Brief to Respondent and Intervenor's Motion for Summary Judgment in the above referenced case. Copies have been served on the parties of record in accordance with the Certificate of Service.

If you have any questions on this matter, please call me at 717-214-9594.

Sincerely,

Heidi L. Wushinske  
Prosecuting Attorney  
Attorney ID No. 93792

Enclosures

cc: As per Certificate of Service

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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement,	:	
Complainant	:	
	:	
v.	:	Docket No. C-2014-2402746
	:	
Snyder Brothers, Inc.,	:	
Respondent	:	

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**I&E’S ANSWER TO THE MOTION FOR SUMMARY JUDGMENT FILED BY  
SNYDER BROTHERS, INC. AND PENNSYLVANIA INDEPENDENT OIL AND  
GAS ASSOCIATION**

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NOW COMES the Pennsylvania Public Utility Commission, Bureau of Investigation and Enforcement (“I&E”), by its prosecutor, pursuant to Section 701 of the Public Utility Code, 66 Pa. C.S. §701, and files this Answer to the Motion for Summary Judgment filed by Snyder Brother’s Inc. (“Snyder Brothers” or “Respondent”) and Pennsylvania Independent Oil and Gas Association (“PIOGA” or “Intervenor”). In support of its Answer, I&E respectfully represents the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.

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9. Admitted.
10. Admitted.
11. Admitted.
12. Admitted.
13. Admitted.
14. Admitted.
15. Admitted.
16. Admitted.
17. Admitted.
18. Admitted.
19. Admitted.
20. Admitted.
21. Admitted.
22. Admitted.

23. Admitted in part and denied in part. It is admitted that paragraph 23 contains a quote from I&E's petition for interlocutory Commission review. To the extent that Respondent attempts to change the meaning of the quote by adding emphasis not present in the original, this attempt is denied.

24. Admitted.
25. Admitted.
26. Admitted.
28. Admitted.
29. Admitted.
30. Admitted.

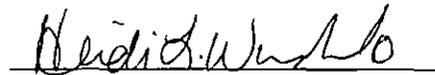
31. Denied. It is denied, for the reasons set forth in I&E's Brief in Support of its Answer to Respondent and Intervenor's Motion for Summary Judgment, that Respondent's wells listed on its Exhibit C to Joint Exhibit 1 are not subject to an impact fee for the year 2011.

32. Denied. It is denied, for the reasons set forth in I&E's Brief in Support of its Answer to Respondent and Intervenor's Motion for Summary Judgment that Respondent's wells listed on its Exhibit C to Joint Exhibit 4 are not subject to an impact fee for the year 2012.

33. Denied. It is denied that Respondent does not owe the impact fees and administrative charges as set forth in I&E's complaint. Respondent's assertion that summary judgment in favor of it is warranted and appropriate is a conclusion of law to which no response is required.

**WHEREFORE**, for all the foregoing reasons, the Bureau of Investigation and Enforcement of Pennsylvania Public Utility Commission respectfully requests that, after consideration of the record, the Office of Administrative Law Judge and the Commission deny Snyder Brothers and PIOGA's Motion for Summary Judgment.

Respectfully submitted,



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Bureau of Investigation and Enforcement  
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Date: July 28, 2014

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