

ORIGINAL



November 22, 2005

RECEIVED

NOV 22 2005

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

VIA OVERNIGHT MAIL

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, Pennsylvania 17120

Re: Lorenzo Suglia v. Pennsylvania-American Water Company
Docket No. C-20055401

DOCUMENT
FOLDER

Dear Secretary McNulty:

On behalf of Pennsylvania American Water, I enclose an original and three copies of its Answer and New Matter to the Formal Complaint of Lorenzo Suglia, an Entry of Appearance and Certificate of Service regarding this matter

As evidenced by the enclosed Certificate of Service, all parties to this proceeding have been duly served. Please time stamp the extra copy of this letter and return it to me in the stamped self-addressed envelope.

Respectfully submitted,

A handwritten signature in cursive script that reads "Seth A. Mendelsohn".

Seth A. Mendelsohn

Enclosures

c: Lorenzo Suglia
Judy Jordan

Pennsylvania American Water

Seth A. Mendelsohn
Corporate Counsel

800 West Hersheypark Drive
Hershey, PA 17033 USA

T 717-533-5000

F 717-531-3252

E seth.mendelsohn@amwater.com

I: www.pawc.com

The logo for RWE Group, featuring a stylized globe icon to the left of the text "RWE Group".

RWE Group

COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ORIGINAL

In the matter of:

Re: Lorenzo Suglia v. Pennsylvania-American Water Company
Docket No. C-20055401

NOTICE OF APPEARANCE

Please enter my appearance in the above-designated matter on behalf of Respondent, Pennsylvania American Water. I am authorized to accept service on behalf of said participant in this matter. I am already receiving or have access to a copy of each document issued by the Pennsylvania Public Utility Commission in this matter and do not on the basis of this notice require an additional copy.

DOCUMENT
FOLDER

Seth A. Mendelsohn

Seth A. Mendelsohn
800 West Hershey Park Drive
Hershey, Pennsylvania 17033
(717) 533-5000

Dated: November 22, 2005

RECEIVED

NOV 22 2005

DOCKETED
DEC 14 2005

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ORIGINAL

LORENZO SUGLIA,
Complainant

v.

PENNSYLVANIA-AMERICAN WATER
COMPANY,
Respondent

DOCKET NO. C-20055401

DOCUMENT
FOLDER

ANSWER TO FORMAL COMPLAINT OF LORENZO SUGLIA

NOW COMES the Respondent, Pennsylvania-American Water Company (the "Company"), by its attorney, and answers the Formal Complaint of Lorenzo Suglia as follows:

1. Admitted.

2. Admitted.

3. Admitted.

4. A. Denied.

4. B. Admitted in part; Denied in part. It is Admitted that the Company

issued a higher than normal water bill on March 1, 2004 to Complainant for 218,000 gallons of water in the amount of \$1,271.55. It is Denied that the Company is responsible for the bill or diagnosing leak issued within Complainant's home. By way of clarification, the Company provided Complainant with a one-time public relations/leak adjustment of 99,200 gallons or \$562.73. It is Denied that Complainant is entitled to any additional credit.

5. Paragraph No. 5 of the Complaint is a prayer for relief to which no response is required. To the extent that any of the remaining averments in Paragraph No. 5 are construed as allegations for which a response is required, the Company denies any and all such allegations.

6. This is a statement to which no response is required.

DOCKETED
DEC 14 2005

RECEIVED

NOV 22 2005

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

7. Admitted that the Complainant contacted the Company in regards to high water bill.

8. This is a statement to which no response is required.

NEW MATTER

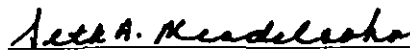
9. The averments contained in Paragraphs 1 through 8 are hereby incorporated by reference.

10. The outstanding balance on the account is \$1,047.73. The Company is entitled to immediate payment.

11. The Complaint fails to state a cause of action for which relief may be granted.

WHEREFORE, Pennsylvania American Water requests your Honorable Commission to dismiss, without hearing, the Formal Complaint of Lorenzo Suglia at Docket No. C-20055401.

Respectfully submitted,



Seth A. Mendelsohn
Corporate Counsel
Pennsylvania American Water
800 West Hershey Park Drive
Hershey, Pennsylvania 17033

Dated: November 22, 2005

ORIGINAL

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

LORENZO SUGLIA,	:	
Complainant	:	
	:	
v.	:	DOCKET NO. C-20055401
	:	
PENNSYLVANIA-AMERICAN WATER	:	
COMPANY,	:	
Respondent	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document, Pennsylvania American Water's Answer and New Matter to the Formal Complaint, upon the participants listed below, in accordance with the requirements of §1.54:

VIA OVERNIGHT MAIL

Lorenzo Suglia
106 Brooks Dr.
Middletown, DE 19709

RECEIVED

NOV 22 2005

Dated this 22nd day of November, 2005.

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

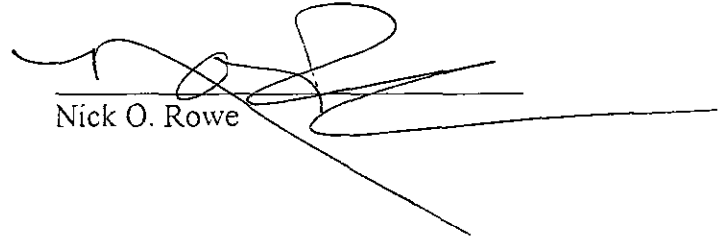
Seth A. Mendelsohn
Seth A. Mendelsohn
Pennsylvania American Water
800 West Hershey Park Drive
Hershey, Pennsylvania 17033
(717) 533-5000

ORIGINAL

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA)
) SS:
COUNTY OF DAUPHIN)

I, NICK O. ROWE, being duly sworn according to law, depose and say that I am authorized to make this Affidavit on behalf of Pennsylvania American Water, being the holder of the office of Vice President with that Company and that the facts set forth are true and correct, or are true and correct to the best of my knowledge, information and belief and that I expect the said Pennsylvania American Water to be able to prove the same at any hearing hereof.


Nick O. Rowe

Sworn to before me this 21st day
of November, 2005.


Notary Public

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
ROBERTA L. GAUTSCH, Notary Public
Derry Twp., Dauphin County
My Commission Expires Oct. 10, 2006

RECEIVED

NOV 22 2005

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

ORIGINAL