



Neighborhood Legal Services Association

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SECRETARY'S BUREAU

Temple Building - Suite 329  
125 East North Street  
New Castle, PA 16101

Toll Free: 1-866-761-6572  
Phone: 724-658-2677  
Fax: 724-658-5994  
Web site: www.nlsa.us

December 28, 2015

Rosemary Chiavetta, Esquire  
Secretary  
PA Public Utility Commission  
Commonwealth Keystone Building, 2 North  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**RE: Docket No. C-2015-2513369  
Robert Wertman v. Pennsylvania Power Company  
Answer to New Matter**

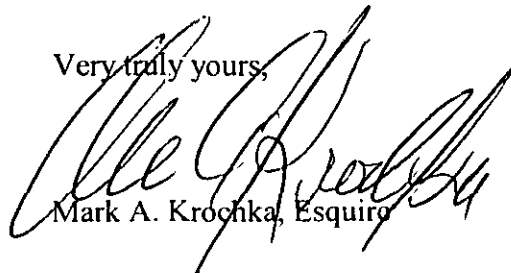
Dear Secretary Chiavetta:

Enclosed please find the original Answer to New Matter for filing in the above captioned matter. As my client, Robert Wertman, did not keep a copy of his original complaint filed in this matter, please provide a copy of that to the undersigned at your earliest convenience.

As indicated on the Certificate of Service, a copy of the Answer to New Matter has been provided to the Respondents in the manner indicated.

Thank you for your consideration.

Very truly yours,



Mark A. Krochka, Esquire

cc: Robert Wertman (w/enc.)  
Margaret A. Morris, Esquire (w/enc.)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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**ROBERT E. WERTMAN** :  
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**PENNSYLVANIA POWER COMPANY** : **Docket No. C-2015- 2513369**

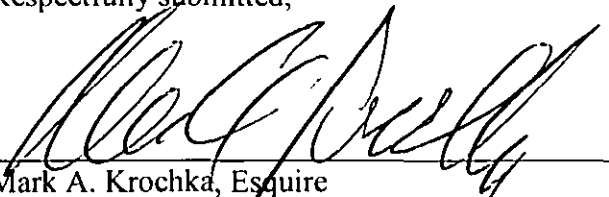
**ANSWER TO NEW MATTER**

AND NOW comes the Plaintiff, Robert E. Wertman, by and through his attorney, Mark A. Krochka, Esquire and Neighborhood Legal Services Association, and for his Answer to Defendants New Matter filed herein states as follows:

11. Paragraph 11 is a conclusion of law that requires no response. To the extent it is not a conclusion of law, it is specifically denied, and strict proof is demanded. By way of further defense, the Plaintiff submits that some charges alleged by the Defendant should have been discharged in bankruptcy, and the service was placed in the name of a legally incompetent person.

12. Paragraph 12 is a conclusion of law that requires no response. To the extent it is not a conclusion of law, it is specifically denied, and strict proof is demanded.

Respectfully submitted,

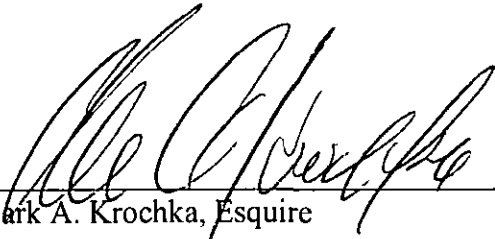
  
\_\_\_\_\_  
Mark A. Krochka, Esquire  
Neighborhood Legal Services Association  
125 E. North Street  
Suite 329 Temple Building  
New Castle, PA 16101-3751  
(724) 658-2677

**VERIFICATION**

I verify that the statements on the foregoing pleading are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa. Section 4904 relating to unsworn falsification to authorities.

This verification is made by counsel pursuant to Pa. R.C.P. § 1024(c) as the Petitioner is currently outside the jurisdiction and his signature can not be obtained within the time limits allowed for filing the pleading. A substitute verification will be submitted upon receipt from the client.

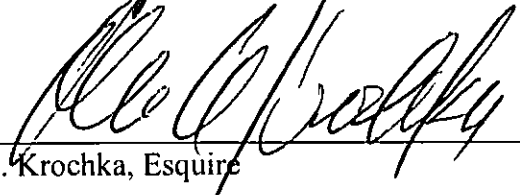
12/28/15  
Date

  
\_\_\_\_\_  
Mark A. Krochka, Esquire

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**CERTIFICATE OF SERVICE**

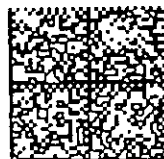
I hereby certify that a true copy of the foregoing was sent by regular U.S. Mail to  
Margaret A. Morris, Esquire, Reger Rizzo Darnall, LLP, Cira Center, 13<sup>th</sup> Floor, 2929 Arch  
Street, Philadelphia, PA 19104 this 28<sup>th</sup> day of December, 2015.


  
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Mark A. Krochka, Esquire

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