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eFiling Confirmation	
Docket Number:	C-2016-2566322
Description:	Answer to objection
Transmission Date:	10/2/2016 1:09:31 PM
Filed On:	10/3/2016 8:00:00 AM
eFiling Confirmation Number:	1652192

Uploaded File List

File Name	Document Class	Document Type
Answer to objection 30 sept 2 oct 2016 1.pdf	Communication	Answer to Motion

02 October 2016

To: The Pa Public Utility Commission Secretary
400 North Street
Harrisburg, PA 17120

From: Ross E. Schell
203 Knollwood Drive
Harrisburg, PA 17109-5515
PH# 717-651-0824
Fax# same but call First.

To whom this concerns:

C-2016-2566322

Petition to Object

I have been paying for water that is to meet the standards of
the clean water act and Pa 52 5101

1501. Character of service and facilities. Every public utility shall furnish and maintain adequate, efficient, safe, and reasonable service and facilities, and shall make all such repairs, changes, alterations, substitutions, extensions, and improvements in or to such service and facilities as shall be necessary or proper for the accommodation, convenience, and safety of its patrons, employees, and the public. Such service also shall be reasonably

continuous and without unreasonable interruptions or delay. Such service and facilities shall be in conformity with the regulations and orders of the commission. Subject to the provisions of this part and the regulations or orders of the commission, every public utility may have reasonable rules and regulations governing the conditions under which it shall be required to render service. Any public utility service being furnished or rendered by a municipal corporation beyond its corporate limits shall be subject to regulation and control by the commission as to service and extensions, with the same force and in like manner as if such service were rendered by a public utility. The commission shall have sole and exclusive jurisdiction to promulgate rules and regulations for the allocation of natural or artificial gas supply by a public utility.

5 With dirty water coming into my house I do not think it even matches the above law. I have proved this with my previous complaints and Suez has admitted I have had dirt in my water in their evidence and answers to my complaints as well as their objections.

6. The meter they installed was stated as a smart meter. Yet it does not even do what their own web site says regarding smart meter. Since they cannot tell me where the dirt is coming from.

And FYI Perchlorate is hazardous to your health know by the EPA in drinking water and they have banned it, and I have that in my drinking water when I empty my hot water heater. Which cannot be explained by Suez's representatives.

7,8,9,10. As far as Any other complaint I may have Filed they are all excepted by the commission secretary as legitimate and not doubled. And they are different and should be handled that way.

11. again I have been paying for clean safe water yet have not received it so a pay back of bills is warranted in this case.

A handwritten signature in black ink, appearing to read 'Ross E. Schell', written in a cursive style.

Ross E. Schell

I request that the Objection be denied and my complaints continue aswritten

<http://www.mysuezwater.com/community-environment/solution-commitment>

SUEZ North America understands that making the most of limited water is more important than ever. Water shortages impact not only the environment, but also our very livelihoods. Mandated water cuts to agriculture and other industries present a new challenge that must be addressed in order to maintain the strength of our local economies and job markets.

In close collaboration with municipalities and consumers, SUEZ is facing this challenge head-on. From our Aquadvanced™ monitoring system to smart meters, we're leading the way by employing innovative technology that conserves billions of gallons of water each and every year.

Smart Meters

Saving Water & Money with Real-Time Data

With traditional water meters, you only get a glimpse of your monthly or quarterly water usage. Smart meters, on the other hand, record water usage in real time, and wirelessly transmit data back to the water company—instantly.

Other benefits of smart metersing:

- Enables you to save water and money by clearly showing how your personal choices impact your water usage; for example, how much water it takes to wash dishes by hand versus with a machine, or how much water your lawn sprinklers use compared to other smaller uses.

- Receive email or text message alerts for sudden spikes in water usage, which could indicate an emergency such as a pipe leak or toilet that constantly flows—including alerts while you are away or on vacation.

At the same time, smart meters allow SUEZ to provide your water at a competitive price, through cost-savings associated with in-person meter readings and improved ability to detect leaks and other forms of waste. SUEZ is testing to improve customer experience and will be rolling out these meters to various markets.

Case Study: Making an Impact in Bayonne, NY

In the first months of operation, over 1,000 homeowners had been notified of potential leaks

SUEZ has installed 34,700 smart meters in the New York Metropolitan area, including 10,500 new smart meters in Bayonne, NJ, covering 90% of the city's residents and businesses. In only the first months of operation, over 1,000 homeowners had been notified by SUEZ of potential leaks on their property.

Thanks to the new smart meter system, we were able to save these homeowners thousands of dollars in damages and repair, as well as increase operational efficiency through fewer in-person meter readings and repairs.

Aquadvanced™: Optimizing Water Networks with Real-Time Monitoring

As drinking water makes the journey from the source to your tap, you may be surprised to learn that a substantial amount is usually lost along the way. In fact, worldwide, over a third of drinking

water is lost, mainly due to aging pipes that develop leaks and breaks

The US is no exception. Much of our piping infrastructure was built over 60 years ago, in the 1940s, and requires constant monitoring and maintenance. In the event of a big main break, millions of gallons of water can be lost, taking weeks or months for leaks to surface and become visible.

In response to this challenge, we developed Aquadvanced™, an innovative platform that monitors the flow of drinking water networks in real time. This allows us to detect leaks much more quickly and pinpoint them to within a few feet, saving millions of gallons of water.

In 2014 we introduced Aquadvanced™ in Westchester County, NY, which had historically high rates of lost water due to underground leaks that were difficult to detect manually. With the system's advanced monitoring abilities, the savings started to add up. We were able to find leaks in hours, not days and fix them in under 24 hours; whereas, before it might have taken several days.

The lost water in our operations in Westchester County has been reduced from 27.9% in December 2013 to 25.2% as of the end of 2014.

Aquifer Storage & Recovery

Saving Water for When We Need it Most

As climate change and urban development add pressure on our finite supply of water, it's critical to explore opportunities to store

as much water as possible. One innovative approach is to store water in underground aquifers using a technique called Aquifer Storage & Recovery (ASR), which involves re-injecting treated water back into an aquifer for later recovery and use.

ASR technology enables our operations in Idaho to meet current and future water demands by storing water during wet periods or periods of low demand and recovering it during dry periods or times of high demand. In 2014 our operations in Idaho enhanced the natural ground water supplies by 478 million gallons.

Giving Waste a Second Life

The rate at which we consume and dispose of the world's resources is simply not sustainable. Factoring in the explosive population growth forecasted for the next fifty years, it's critical that we embrace new practices and technologies to reduce, reuse, and recycle. SUEZ North America is leading this charge—with extensive programs for water and solid materials.

In 2014, 12% of the water we produced was recycled

In 2014, we recycled 55 tons of materials

Wastewater Reused Company-Wide (%)



THOMAS, NIESEN & THOMAS, LLC

Attorneys and Counsellors at Law

THOMAS T. NIESEN
Direct Dial: 717.255.7641
tniesen@tntlawfirm.com

September 30, 2016

Via Electronic Filing

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

In re: Docket No. C-2016-2566322
Ross E. Schell v. Suez Water Pennsylvania Inc.

Dear Secretary Chiavetta:

We are counsel to Suez Water Pennsylvania Inc. in the above referenced matter and are submitting via electronic filing its Preliminary Objections to the Complaint of Ross E. Schell. A copy of the Preliminary Objections is being served upon Mr. Schell by first class mail, postage prepaid, as set forth on the certificate of service attached to them.

Very truly yours,

THOMAS, NIESEN & THOMAS, LLC

By

Thomas T. Niesen

Enclosure

cc: Certificate of Service (w/encl.)
Judith A. McCoy Jordan (via email, w/encl.)

160930-Chiavetta (Preliminary Objections).wpd

**Before The
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ROSS E. SCHELL,	:	
Complainant	:	
	:	
v.	:	Docket No. C-2016-2566322
	:	
SUEZ WATER PENNSYLVANIA INC.,	:	
Respondent	:	

NOTICE

TO: ROSS E. SCHELL
203 KNOLLWOOD DRIVE
HARRISBURG, PA 17109

PURSUANT TO 52 PA CODE SECTION 5.101(b), NOTICE IS HEREBY GIVEN THAT AN ANSWER TO THE FOLLOWING PRELIMINARY OBJECTIONS SHALL BE FILED WITHIN 10 DAYS OF THE DATE OF SERVICE.

DATE OF SERVICE: SEPTEMBER 30, 2016.

Before The
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ROSS E. SCHELL,

Complainant

v.

SUEZ WATER PENNSYLVANIA INC.,

Respondent

:
:
:
:
:
:
:
:

Docket No. C-2016-2566322

PERLIMINARY OBJECTIONS OF
SUEZ WATER PENNSYLVANIA INC.

AND NOW comes Suez Water Pennsylvania Inc. (“Suez”), by its attorneys, and, pursuant to 52 Pa. Code § 5.101, files these Preliminary Objections to the Complaint of Ross E. Schell (“Complainant”) at C-2016-2566322:

1. This proceeding concerns the Complaint of Ross E. Schell at Public Utility Commission (“Commission”) Docket No. C-2016-2566322.

2. Service of the Complaint was made by the Commission’s Office of the Secretary on September 13, 2016.

3. Regulations of the Commission at 52 Pa. Code Section 5.101 provide for the filing of preliminary objections in response to a Complaint.

4. Suez objects to the Complaint as follows:

Pendency of Prior Proceedings – 52 Pa. Code § 5.101(a)(6)

5. Complainant avers that there are incorrect charges on his bill and that he has a reliability, safety, quality or other problem with his water service. He includes with his Complaint a copy of a letter dated September 9, 2016, to the Commission Secretary.

6. The letter of September 9 discusses conversations between Complainant and Suez and claims that Complainant's meter is reading wrong. Significant for the purpose of these Preliminary Objections, the letter concludes with the explanation that the Complaint is about billing and meter reading since the installation of the new meter in April of this year.

7. Complainant has four other Complaint proceedings at C-2016-2551544, C-2016-2558244, C-2016-2559741 and C-2016-2563040, presently scheduled for hearing on October 4, 2016.

8. In the proceeding at C-2016-2558244, Complainant avers that there are incorrect charges on his bill and that Suez has not tested Complainant's meter.

9. In the proceeding at C-2016-2563040, Complainant expresses concern with the accuracy of the outside meter installed by Suez in April of this year.

10. The pendency of the prior and pending billing and meter reading proceedings makes this billing and meter reading proceeding unnecessary.

Lack of Commission Jurisdiction – 52 Pa. Code § 5.101(a)(1)

11. The Complaint seeks, as relief, \$50,000 dollars to be paid to Complainant as a fine.

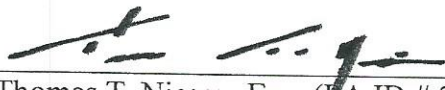
12. The Commission has no jurisdiction to direct a civil penalty payment (fine) to Complainant. Section 3301 of the Public Utility Code, 66 Pa. C.S. § 3301, provides that civil penalties are paid to the Commonwealth of Pennsylvania.

13. The Complaint also seeks, as relief, a "restart" of billing, suggesting that Complainant wants to be relieved of paying for his water service.

14. The Commission has no jurisdiction to relieve Complainant from paying tariff charges for his water service. Section 1303 of the Public Utility Code, 66 Pa. C.S. § 1303, requires that Suez charge and Complainant pay the tariff rate for service.

WHEREFORE, Suez Water Pennsylvania Inc. requests that the Pennsylvania Public Utility Commission grant these Preliminary Objections and dismiss the Complaint of Ross E. Schell at C-2016-2566322.

Respectfully submitted,

By 
Thomas T. Niesen, Esq. (PA ID # 31379)
THOMAS, NIESEN & THOMAS, LLC
212 Locust Street, Suite 600
Harrisburg, PA 17101
Tel: 717-255-7600

Attorney for Respondent Suez Water Pennsylvania Inc.

DATED: September 30, 2016

Before The
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ROSS E. SCHELL, :
Complainant :
v. : Docket No. C-2016-2566322
SUEZ WATER PENNSYLVANIA INC., :
Respondent :


CERTIFICATE OF SERVICE

I hereby certify that I have this 30th day of September 2016, served a true and correct copy of the foregoing Preliminary Objections of Suez Water Pennsylvania Inc., upon the persons and in the manner set forth below:

VIA FIRST CLASS MAIL

Ross E. Schell
203 Knollwood Drive
Harrisburg, PA 17109

The Honorable Jeffrey A. Watson
Piatt Place
Suite 220
301 5th Avenue
Pittsburgh, PA 15222


Thomas T. Niesen (PA ID # 31379)



PENNSYLVANIA PUBLIC UTILITY COMMISSION

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eFiling Confirmation	
Docket Number:	C-2016-2566322
Description:	Ross E. Schell v Suez Water Pennsylvania Inc.
Transmission Date:	9/30/2016 1:07:47 PM
Filed On:	9/30/2016 1:07:47 PM
eFiling Confirmation Number:	1652045

Uploaded File List

File Name	Document Class	Document Type
Suez Water Preliminary Objections to Schell Complaint - C-2016-2566322.pdf	Other Filing	Preliminary Objection

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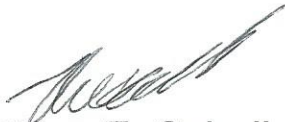
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Certificate Of Service

I do Herby Certify That I have This Day 02 October 2016 I Have Served a true And correct copy of the Answer to Suez's Objection form 30 September 2016 upon The person's and manner Set Forth Below.

Via Fax Answer to Objection

Thomas T Niesen
Thomas, Niesen & Thomas LLC
212 Locust Street
Suite 600
Harrisburg, PA 17101
The Honorable Jeffery A. Watson
Piatt Place
Suite 200
301 5th Avenue
Pittsburg, Pa 15222



Ross E. Schell