

Manwalamink Sewer Company

River Road, Fort DePuy
P.O. Box 48
Shawnee-on-Delaware, PA 18356-0048

570-517-2390
Fax: 570-476-9909

June 20, 2017

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JUN 20 2017

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

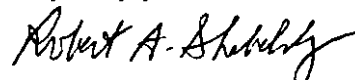
Re: PA Public Utility Commission v. Manwalamink Sewer Company
Formal Complaint Docket No. C-2017-2608641

Dear Ms. Chiavetta:

In regard to the above-referenced matter, enclosed please find our answer to the Formal Rate Complaint.

If you have any questions, please contact us. Thank you.

Very truly yours,



Robert A. Shebelsky
Chairman/Chief Executive Officer

Enclosure

RAS/cmc

cc: Christine Maloni Hoover, Office of Consumer Advocate
Office of Special Assistants (e-mail only: ra-OSA@pa.gov)
Office of Administrative Law Judge
Bureau of Technical Utility Services, Water/Wastewater Division (e-mail only)

**Response to PA PUC vs Manwalamink Sewer Company @ Formal Complaint Docket # C-2017-2608641
(Rate Case Docket # R-2017-2603038)**

Manwalamink Sewer Company (MSC) Responds to the Complaint as follows:

1. Complainant

Tanya J. McCloskey of the Office of Consumer Advocate.

2. Utility Name (RESPONDENT)

Manwalamink Sewer Company (MSC or Company).

3. Type of Utility

Sewer (Wastewater Service)

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4. Complaint

A. Admitted

B. Admitted

C. Admitted

D. Admitted

E. MSC believes its proposed rate increase is just, reasonable, lawful and in accordance with sound ratemaking principles resulting in a fair rate return. MSC further believes its services are reliable and its rates do not discriminate against any customer.

5. Relief

Acting Consumer Advocate seeks the following relief:


- A. **Suspension and investigation pursuant to operation of Section 1308 (d) of the Public Utility Code.** The Company believes that further investigation of the merits of the proposed increase and delay will adversely impact the Company's financial viability. Subsequent to filing for a proposed rate increase with the Commission, the Company has responded to the Bureau of Technical Utility Services Water/Wastewater Division's May 21, 2017 Data Request 1 written and additional verbal data requests by Technical Utility Services and OCA.
- B. **Consolidate all complaints.** No customers have filed complaints about the rate increase or the service rendered. The only complaint is from the OCA.
- C. **Hold evidentiary hearings examining the reasonableness of the Company's existing and proposed rate increase.** The Company believes that the rate case can be resolved by discussions with OCA to clarify any issues and thus avoid the expense and financial burden on the Company of formal hearings.
- D. **Provide the public with adequate notice to allow customers the opportunity to be heard on the record.** No customers have filed formal or informal complaints about the proposed rate increase.
- E. **Deny any charges that cannot be fully justified.** The Company seeks only rates that can be justified based on public utility practice and policy.

F. **Grant such other relief that the Commission may deem necessary.** The Company believes that it is in compliance with Public Utility Commission regulations and that other relief is not necessary.

6. VERIFICATION AND SIGNATURE

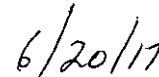
Verification:

I, Robert A. Shebelsky, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).



Robert A. Shebelsky

Chairman/Chief Executive Officer



Date

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