

PITTSBURGH, PA 15234

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PA PUC
SECRETARY'S BUREAU

May 14, 2018

Rosemary Chiavetta, Secretary
Pennsylvania Public Utilities Commission
P.O. Bo 3265
Harrisburg, PA 17105-3265

**RE: Amended Complaint Against Pennsylvania Water and Sewer Authority ["PWSA"]
Docket No. C-2018-3000961**

Dear Ms. Chiavetta:

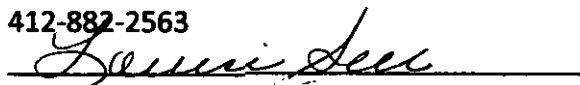
Please accept for filing the attached Reply to New Matter in the above referenced matter.

Thank you for your attention to this matter.

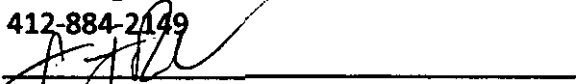
Yours truly,



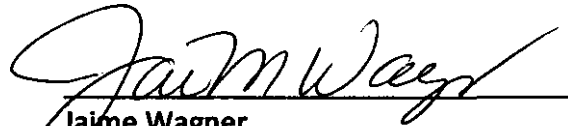
Natalie Leon
2805 Homehurst Ave.
Pittsburgh, PA 15234
412-882-2563



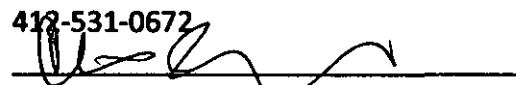
Louise Sell
2913 Homehurst Ave.
Pittsburgh, PA 15234
412-884-2149



James Rauber
1801 Byrnwick Dr.
Pittsburgh, PA 15243
412-279-0484



Jaime Wagner
2901 Homehurst Ave.
Pittsburgh, PA 15234
412-531-0672



Christopher Cratsley
2915 Homehurst Ave.
Pittsburgh, PA 15234
412-478-0140

Cc: Certificate of Service [w/enc.]

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BEFORE THE PENNSYLVANIA PUBLIC UTILITIES COMMISSION

Natalie Leon, Jaime Wagner, Louise Sell,
Christopher Cratsley, and James Rauber

v.

Doc. No. C-2018-3000961

Pennsylvania Water and Sewer Authority
("PWSA")

REPLY TO NEW MATTER

Ratepayers' Statement

The Pennsylvania Water and Sewer Company ["PWSA"] chose to argue its case through its Answer and New Matter. The facts were misrepresented and erroneous off-point statements made to the Commission in order to diffuse PWSA's actual responsibility to these Ratepayers. PWSA's own regulations permit them entry onto public and private property. In addition, material in the public record was denied. Their entire refusal to service Homehurst Avenue is based on the personal opinion of a single employee. At the time of hearing, Ratepayers will present actual witnesses to prior service by the City of Pittsburgh on the Homehurst line. The actions of PWSA violate public policy, and Ratepayers are entitled to the relief requested in the Amended Complaint.

Reply to New Matter

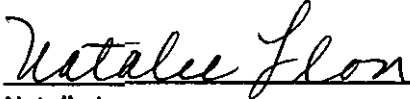
Ratepayers generally deny the allegations of PWSA's New Matter as:

1. An Amended Complaint has been filed.
2. PWSA has failed to attach a material contract on which they rely in Paragraph 47 of their New Matter.

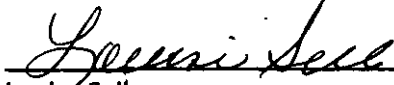
WHEREFORE, Ratepayers pray that the New Matter be dismissed in its entirety and that they be granted the relief requested.

Dated: May 14, 2018

Respectfully submitted,



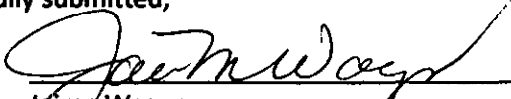
Natalie Leon



Louise Sell



James Rauber



Jaime Wagner



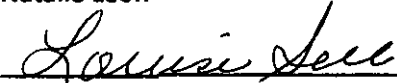
Christopher Cratsley

VERIFICATION

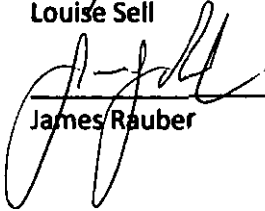
The undersigned *pro se* Ratepayers state that the facts set forth in the foregoing Reply to New Matter and true and correct to the best of their knowledge, information and belief. We expect to prove the same at a hearing to be held in this matter. We further understand that the statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904 relating to false statements to authorities.




Natalie Leon




Louise Sell



James Rauber



Jaime Wagner



Christopher Cratsley

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BEFORE THE PENNSYLVANIA PUBLIC UTILITIES COMMISSION

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Christopher Cratsley, and James Rauber

v.

Doc. No. C-2018-3000961

Pennsylvania Water and Sewer Authority
("PWSA")


CERTIFICATE OF SERVICE

We hereby certify that on May 14, 2018 we served a copy of the foregoing Reply to New Matter by first-class mail upon the persons listed below:

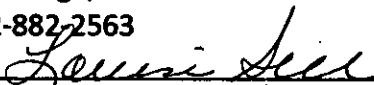
Rosemary Chiavetta, Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Daniel Clearfield, Esquire
Carl R. Shultz, Esquire
Eckert Semans Cherin & Mellott, LLC
213 Market Street
Harrisburg, PA 17101

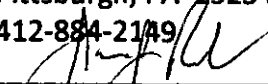
Office of Administrative Law Judge
PA Public Utility Commission
400 North Street
Harrisburg, PA 17120




Natalie Leon
2805 Homehurst Ave.
Pittsburgh, PA 15234
412-882-2563



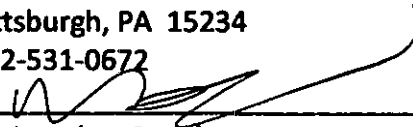
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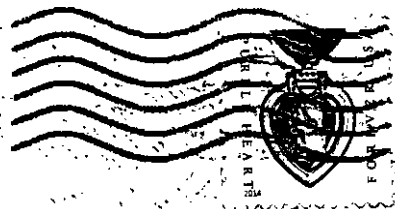
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PO BOX 3265
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17105-326565

