

PITTSBURGH, PA 15234

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PA PUC
SECRETARY'S BUREAU

June 26, 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:

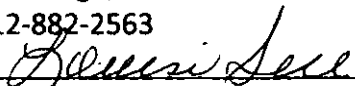
Please accept for filing the attached Reply to New Matter in the above referenced matter.

Thank you for your attention to this matter.

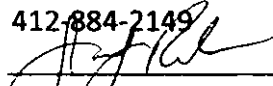
Yours truly,



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



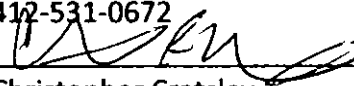
Louise Sell
2913 Homehurst Ave.
Pittsburgh, PA 15234
412-884-2149



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. The City of Pittsburgh Department of Public Works has serviced the dedicated Homehurst sewer line for over 70 years, and there are witnesses to this servicing by the Department of Public Works.

PWSA has been attempting to prevent Ratepayers from taking any action on their claims since 2014 by relying on a single decision maker whose allegations they know are not credible. These actions of PWSA violate public policy, and Ratepayers are entitled to the relief requested.

Reply to New Matter

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

1. A Second Amended Complaint has been filed.
2. PWSA relies on a material contract they have not attached and to which their own attorney has voiced objection to.

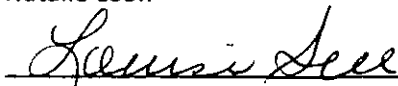
WHEREFORE, Ratepayers pray that the New Matter be dismissed in its entirety and that they be granted the relief requested.

Dated: JUNE 26, 2018

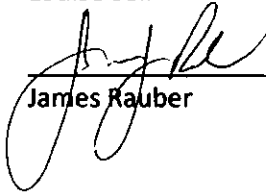
Respectfully submitted,



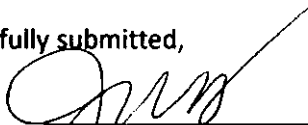
Natalie Leon



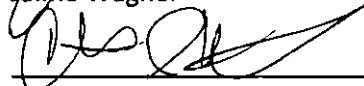
Louise Sell



James Rauber




Jaime Wagner



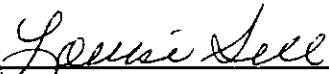
Christopher Cratsley

VERIFICATION

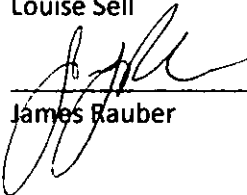
The undersigned Ratepayers state that the facts set forth in the foregoing Reply to New Matter and true and correct to the best of their knowledge, information and belief. We expect to prove the same at a hearing to be held in this matter. We further understand that the statements herein are made subject 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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v.

Doc. No. C-2018-3000961

Pennsylvania Water and Sewer Authority
("PWSA")

CERTIFICATE OF SERVICE

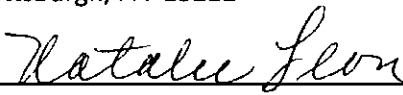
We hereby certify that on 6/26/18 we served a copy of the foregoing Reply to New Matter by first-class mail upon the persons listed below:

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

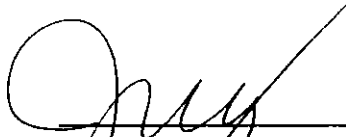
Daniel Clearfield, Esquire
Carl R. Shultz, Esquire
Eckert Semans Cherin & Mellott, LLC
213 Market Street
Harrisburg, PA 17101

Honorable Mark A. Hoyer
Office of Administrative Law Judge
PA Public Utility Commission
301 5th Avenue, Suite 220
Pittsburgh, PA 15222

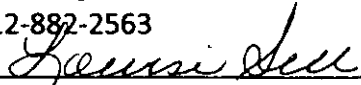
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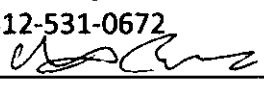
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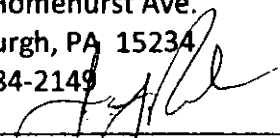
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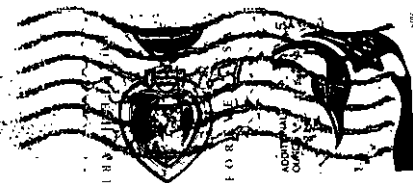


James Rauber
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PGH, PA 15234

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26 JUN 2018 PM 9 L



ROSEMARY CHIAVETTA, SECY
PA P.U.C.

P.O. BOX 3265

HARRISBURG, PA 17105-3265

17105-326565

