

PITTSBURGH, PA 15234

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SECRETARY'S BUREAU

May 16, 2019

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

RE: *Leon, et al. v. Pennsylvania Water and Sewer Authority ["PWSA"]*
Docket No. C-2018-3000961

Dear Ms. Chiavetta:

Enclosed for filing is Complainants' Answer to New Matter in the above action.

Also enclosed is an individual signature page with Mr. Cratley's signature. Please annex it to the Reply to PWSA's Answer to Motion to Strike which was previously filed.

Thank you for your attention to this matter.

Yours truly,



Complainant

Cc: Certificate of Service [w/encs.]

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BEFORE THE PENNSYLVANIA PUBLIC UTILITIES COMMISSION

Natalie Leon, Jaime Wagner, Louise Sell,
Christopher Cratsley, James Rauber,
Patricia Schanck and Elwyn Family Trust
v.

Doc. No. C-2018-3000961

Pennsylvania Water and Sewer Authority
("PWSA")

ANSWER TO NEW MATTER

Complainants answer PWSA's New Matter as follows:

47. Admitted in part and denied in part. It is admitted that sewage is not presently being discharged from the Subject Line, but denies it is not a threat to the Complainants. A discharge that can occur at any time poses a risk not only to the health and welfare of the neighborhood, but causes property damage as well. Property at 2805 Homehurst becomes a swamp, and prior sewage discharges have already caused damage to existing concrete steps. When sewage is discharged, since there are no sidewalks on Homehurst Ave., residents, including children that must walk down the hill to meet their school buses, must walk through the feces discharge.

48. Admitted.

49. Admitted.

50. Denied. James Rauber has a substantial financial interest in 252 Elwyn Ave. which is part of the Subject Line per PWSA's own admission.

51-55. Admitted.

56. Admitted in part and denied in part. It is admitted that Mr. Rauber is not acting as a fiduciary or representative in this matter and that the Elwyn Family Trust has legal counsel, but it is denied that Mr. Rauber has no substantial interest in 252 Elwyn Ave. Mr. Rauber is a party in interest.

Further, Mr. Rauber was a party in the Court of Common Pleas matter, and his interest in 252 Elwyn Ave. was never disputed by PWSA; nor was his standing questioned. The outcome in favor of Complainants clearly includes Mr. Rauber.

57-58. Denied.

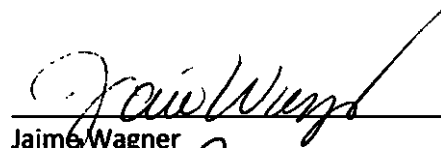
WHEREFORE, Complainants pray for an order from the PUC directing PWSA to fix the Subject Line in a reasonable period of time before the health, welfare and property of Complainants is again put at risk by PWSA's failure to service the line for which they are responsible.

Dated: 5/16/19

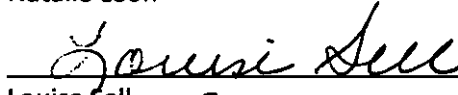
Respectfully submitted,



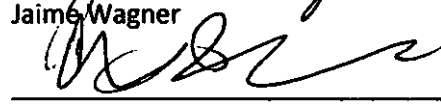
Natalie Leon



Jaime Wagner



Louise Sell

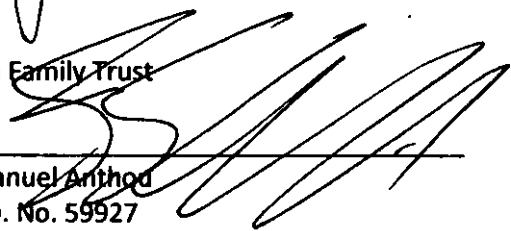


Christopher Cratsley



James Rauber

Elwyn Family Trust

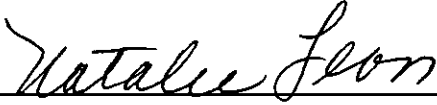

By: _____

Emmanuel Anthou
PA I.D. No. 59927
Anthou Legal Services, LLC
142-A McClelland Road
Canonsburg, PA 15317
(724) 743-1884

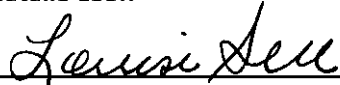
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VERIFICATION

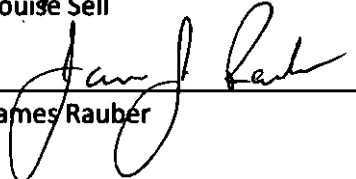
The undersigned Customers state that the facts set forth in the foregoing document and true and correct to the best of their knowledge, information and belief. We further understand that the statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904 relating to false statements to authorities.



Natalie Leon



Louise Sell



James Rauber



Jaime Wagner



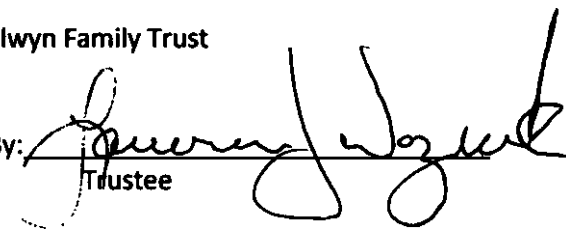
Christopher Cratsley

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VERIFICATION

I, L. WOZNIAK, Trustee of the Elwyn Family Trust, state that I am authorized to execute this Verification on behalf of said Trust, that the facts set forth in the foregoing document are true and correct to the best of my knowledge, information and belief. I further affirm that the statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904 relating to false statements to authorities.

Elwyn Family Trust

By: 
Trustee

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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")

CERTIFICATE OF SERVICE

I hereby certify that on May 16, 2019, I served a copy of the foregoing document 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
Deanne O'Dell, 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

Natalie Leon

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Dated: _____

Respectfully submitted,

Natalie Leon

Louise Sell

James Rauber

Elwyn Family Trust

By: _____

Emmanuel Anthou
PA I.D. No. 59927
Anthou Legal Services, LLC
142-A McClelland Road
Canonsburg, PA 15317
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Jaime Wagner



Christopher Cratsley

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2805 Nonheurst Ave
Pittsburgh, PA 15234

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

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