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WILLIAM C. CRAMER
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July 1, 2019

Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

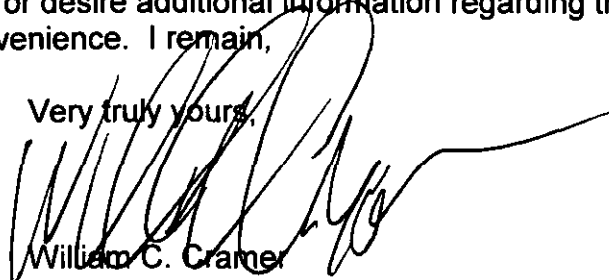
**Re: GECO Holding, Ltd. v. West Penn Power Company
Docket No. C-2019-3010108**

Dear Sir/Madam:

Enclosed herewith please find the original and three copies of an Answer to New Matter to be filed in the above referenced matter. Please return a filed copy to me in the enclosed self-addressed stamped envelope.

Should you have any questions or desire additional information regarding this matter, please contact me at your earliest convenience. I remain,

Very truly yours,



William C. Cramer

WCC:skr

Enclosures

cc Aron J. Beatty, Esq.

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

GECO HOLDING, LTD.

vs.

WEST PENN POWER COMPANY

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:
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Docket No. C-2019-3010108

ANSWER TO NEW MATTER

NOW COMES GECO Holding, Ltd., by and through counsel, namely, William C. Cramer, and answers the New Matter as follows:

11. Paragraphs 1 through 10 of the Complaint are incorporated herein by reference as if set forth therein.

12. Admitted that the Commission possesses only the authority as provided by law under and in accordance with the Public Utility Code. All other averments within this paragraph are denied as conclusions of law to which no responsive pleading is required.

13. Admitted that the Commission's jurisdiction arises from the lawful authority granted to the Commission by the statutes and laws of the Commonwealth. All other averments within this paragraph are denied as conclusions of law to which no responsive pleading is required.

14. Admitted that the parties may not confer jurisdiction upon a tribunal where none exists under the laws of the Commonwealth. All other averments of this

paragraph are denied as conclusions of law to which no responsive pleading is required.

15. Admitted that the issue of subject matter jurisdiction is not waived, but rather, may be raised at any stage of the judicial process. All other averments of this paragraph are denied as conclusions of law to which no responsive pleading is required.

16. Denied, as a conclusion of law to which no responsive pleading is required.

17. Admitted that Section 501 of the Code, 66 Pa.C.S. §501, provides the language as stated within that Section. All other averments within this paragraph are denied as conclusions of law to which no responsive pleading is required.

18. Admitted that Section 701 of the Code, 66 Pa.C.S. §701, states the language as provided within that Section. All other averments within this paragraph are denied as conclusions of law to which no responsive pleading is required.

19. Denied, as a conclusion of law to which no responsive pleading is required. Further denied for the reason that Paragraph 4 of the Complaint filed raises issues regarding the reasonableness of the location and/or the necessity of a relocation of the utility poles and transmission lines crossing Complainant's property. Further, in conversations between Complainant and a West Penn Power representative, as averred within Paragraph 4 of the Complaint, the customer was led to believe that West Penn Power agreed to relocate the poles and transmission lines at the expense of West Penn because of customer's building operations. Subsequently, however, West

Penn refused to cooperate with customer regarding the needed relocation of the poles and transmission lines. All of these factual matters raise the issue of the reasonableness of the actions of West Penn under the facts and circumstances pertaining.

21. Denied, as a conclusion of law to which no responsive pleading is required. Further denied for those reasons set forth within Paragraph 4 of the Complaint and the answer stated within Paragraph 19 of this Answer, all of which are incorporated herein by reference thereto. That is, the issues raised within the Complaint and this Answer to New Matter involve issues in addition to those concerning the scope and validity of a utility company's right-of-way.

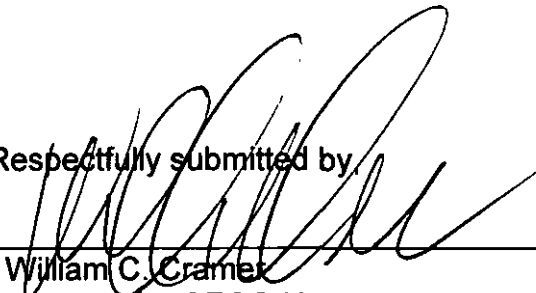
22. Denied, as a conclusion of law to which no responsive pleading is required. Further denied for those reasons set forth within the answers to Paragraphs 19 and 21, all of which are incorporated herein by reference thereto.

23. Denied, as a conclusion of law to which no responsive pleading is required. Further denied for those reasons set forth within the answers stated within Paragraphs 19 and 21, which are incorporated herein by reference thereto.

24. Denied, as a conclusion of law to which no responsive pleading is required. Further denied for those reasons set forth within the answers stated within Paragraphs 19 and 21, which are incorporated herein by reference thereto.

WHEREFORE, it is respectfully requested that the Commission grant the relief requested, that is, requiring West Penn Power Company to relocate the poles and transmission lines crossing Complainant's property at the expense of West Penn Power Company.

Respectfully submitted by,



William C. Cramer
Attorney for GECO Holding, Ltd.
220 Lincoln Way East
Chambersburg, PA 17201
(717) 264-3711
Supreme Court I.D. No. 22495

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I, David L. George, President of GECO Holding, Ltd., verify that the statements made in the attached Answer are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. §4904, relating to unsworn falsification to authorities.

GECO Holding, Ltd.

Date: June 26, 2019



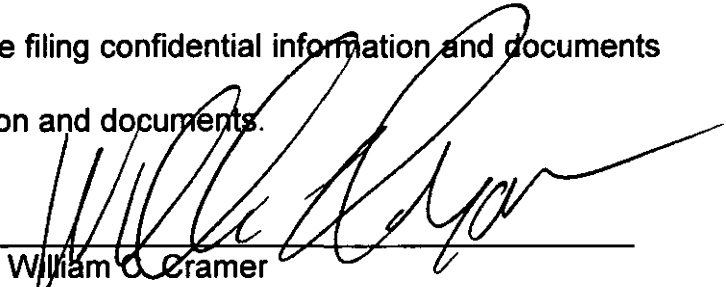
David L. George, President

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CERTIFICATION

I, William C. Cramer, certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Date: July 1, 2019



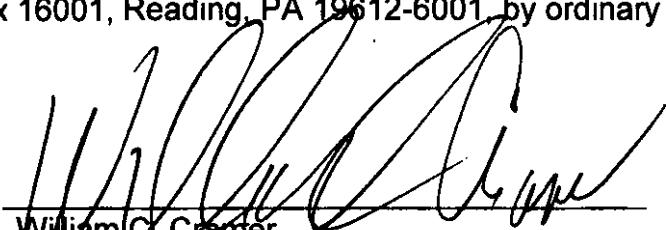
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CERTIFICATE OF SERVICE

I, William C. Cramer, Attorney for GECO Holding, Ltd., hereby certify that on this date I served a true and correct copy of the attached Answer to New Matter upon Aron J. Beatty, Esq., Attorney for West Penn Power Company, at FirstEnergy Service Company, 2800 Pottsville Pike, P.O. Box 16001, Reading, PA 19612-6001, by ordinary first class mail, postage prepaid.

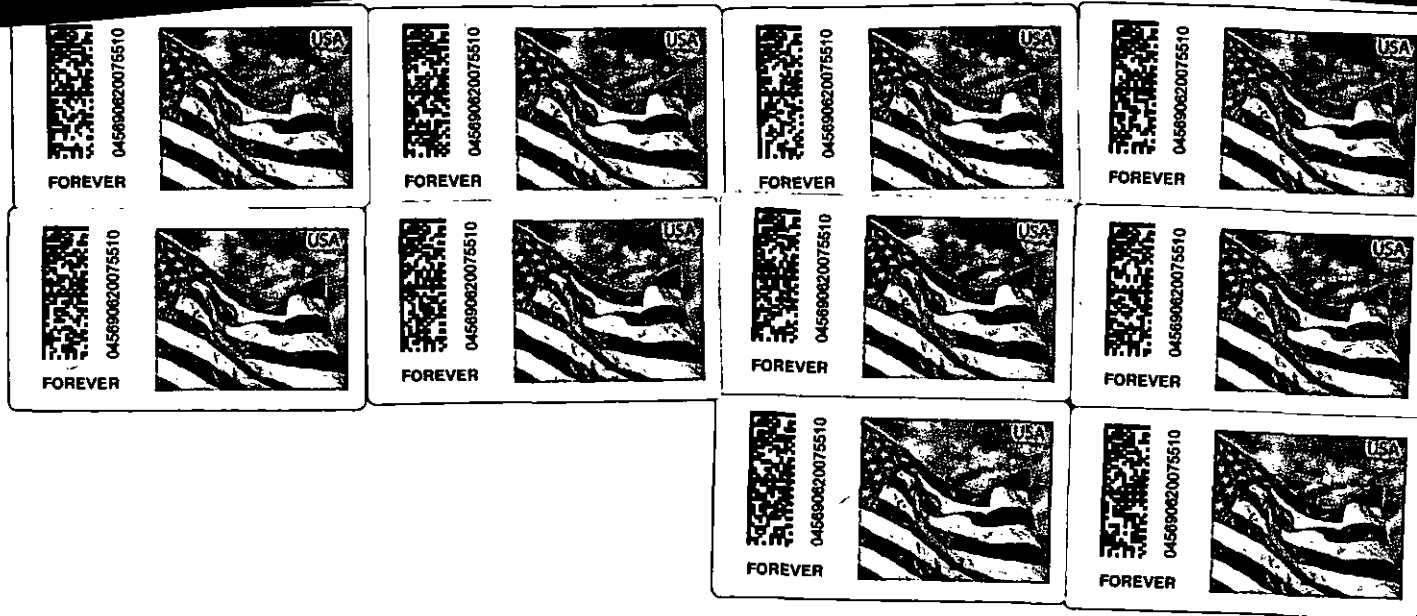
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William C. Cramer
Attorney for GECO Holding, Ltd.

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William C. Cramer, Esq.
220 Lincoln Way East
Chambersburg, PA 17201



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