

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MUNICIPALITY OF PENN HILLS C/O	)	
SCOTT ADREJCHAK	)	No. C-2019-3013809
	)	
Complainant	)	<b>Electronically filed</b>
	)	
v.	)	
	)	
UNION RAILROAD COMPANY, CITY OF	)	
PITTSBURGH, BOROUGH OF VERONA,	)	
COUNTY OF ALLEGHENY, PENNDOT	)	
	)	
Respondent	)	

**RESPONSE TO NEW MATTER**

COMPLAINANT, Municipality of Penn Hills c/o Scott Andrejchak does hereby respond to Respondent Union Railroad Company's New Matter as follows:

1. Admitted.
2. The allegation set forth in paragraph 2 of Respondent's New Matter states a conclusion of law which requires no response. As such it is denied. To the extent a response is required, Complainant believes and therefore avers the line is located on URR owned property.
3. The allegation set forth in paragraph 2 of Respondent's New Matter states a conclusion of law which requires no response. As such it is denied. To the extent a response is required, Complainant believes and therefore avers the line is located on URR owned property.
4. The allegation set forth in paragraph 3 of Respondent's New Matter states a conclusion of law which requires no response. As such it is denied. To the extent a response is required, Complainant believes and therefore avers the line is located on URR owned property and with that a right an obligation to maintain the inlet of the storm water line.
5. The allegation set forth in paragraph 3 of Respondent's New Matter states a conclusion of law which requires no response. As such it is denied.
6. The allegation set forth in paragraph 3 of Respondent's New Matter states a conclusion of law which requires no response. As such it is denied.
7. The allegation set forth in paragraph 3 of Respondent's New Matter states a conclusion of law which requires no response. As such it is denied.

Wherefore, Complainant requests relief as more formally set forth in the formal complaint previously filed.

Respectfully submitted,



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Craig H. Alexander, Esquire  
Attorney for Plaintiff

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Pittsburgh, PA 15239  
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COUNTY OF ALLEGHENY, PENNDOT	)	
	)	
Respondent	)	

**CERTIFICATE OF SERVICE**

I, Craig H. Alexander, Esquire, do hereby certify that, a true and correct copy of the foregoing Response to New Matter was sent via email to the below named individuals:

Hon. Katrina L. Dunderdale  
Pennsylvania Public Utility Commission  
Piatt Building, Ste 220  
301 Fifth Avenue  
Pittsburgh, PA 15222  
[kdunderdal@pa.gov](mailto:kdunderdal@pa.gov)

Samuel F. Reynolds, Jr.  
Unites States Steel Corp.  
600 Grant Street, Suite 1500  
Pittsburgh, PA 15219  
[sfreynoldsjr@uss.com](mailto:sfreynoldsjr@uss.com)

Kayla Rost, Esquire PUC  
400 North Street  
Harrisburg, PA 17120  
[karost@pa.gov](mailto:karost@pa.gov)



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