
TKACIK LAW OFFICE, P.C.

May 11, 2020

Via Electronic Filing

Rosemary Chiavetta, Secretary
PA Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

Re: Ya Ping Wu a/k/a Mabel Wu v. Pittsburgh Water and Sewer Authority
Docket No. C-2020-3019410

Dear Secretary Chiavetta:

Please find enclosed for electronic filing Ya Ping Wu a/k/a Mabel Wu's Reply to New Matter.
Copies will be served in accordance with the attached Certificate of Service.

Sincerely,

TKACIK LAW OFFICE, P.C.

/s/ David M. Tkacik

David M. Tkacik

Enc.

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that this day I served a copy of the foregoing Reply to New Matter upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via email only (due to the current pandemic emergency)

Charles E. Rainey, Jr., Administrative Law Judge
crainey@pa.gov

Shannon F. Barkley, Esq.
Pittsburgh Water and Sewer Authority
Penn Liberty Plaza I
1200 Penn Avenue
Pittsburgh, PA 15222
Sbarkley@pgh2o.com

Lauren M. Burge, Esq.
Eckert Seamans Cherin & Mellot, LLC
600 Grant St., 44th Floor
Pittsburgh, PA 15219

Date: May 11, 2019

/s/ *David M. Tkacik*
David M. Tkacik, Esq.
Attorney for Complainant, Ya Ping Wu
a/k/a Mabel Wu

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Ya Ping Wu a/k/a Mabel Wu,

Docket No. C-2020-3019410

Complainant,

v.

The Pittsburgh Water and Sewer Authority,

Respondent.

COMPLAINANT'S REPLY TO NEW MATTER

Pursuant to 52 Pa. Code § 5.63, Complainant, Ya Ping Wu a/k/a Mabel Wu (“Complainant”) submits this Reply to New Matter, which was served on Complainant on April 21, 2020. In support of this Reply to New Matter avers as follows:

1-10. Complainant incorporates by reference paragraphs 1-10 of her Formal Complaint.

11. Admitted. By way of further response, PWSA’s erroneous charges first appeared on Complainant’s bill in September of 2019, well-within the three-year statute of limitation.

12. Admitted. By way of further response, PWSA's erroneous charges first appeared on Complainant's bill in September of 2019, well-within the three-year statute of limitation.
13. Denied. To the contrary, the Formal Complaint contains allegations about erroneous charges appearing on Complainant's invoices for the first time in September of 2019.
14. Denied. To the contrary, the Formal Complaint contains allegations about erroneous charges appearing on Complainant's invoices for the first time in September of 2019.

WHEREFORE, Complainant demands the relief requested in her Formal Complaint, along with any other relief deemed appropriate.

Respectfully Submitted

/s/ David M. Tkacik

DAVID M. TKACIK, ESQUIRE

PA ID No. 209084

Counsel for Complainant, Ya Ping Wu a/k/a Mabel Wu

TKACIK LAW OFFICE, P.C.

722 Seth Drive

Cranberry Twp., PA 16066

Phone: (412) 414-9644

VERIFICATION

I, Ya Ping Wu a/k/a Mabel Wu, have read and verify the foregoing Reply to New Matter. The statements therein are true and correct to the best of my personal knowledge, information and belief. This statement of verification is made subject to the penalties of 18 Pa.C.S.A. § 4904 relating to unsworn falsification to authorities, which provides that if I make knowingly false averments, I may be subject to criminal penalties.

<u><i>/s/ Ya Ping Wu a/k/a Mabel Wu</i></u>	<u><i>5/11/20</i></u>
Ya Ping Wu a/k/a Mabel Wu	Date