

# Stevens & Lee

17 N. Second Street, 16<sup>th</sup> Floor  
Harrisburg, PA 17101  
(717) 234-1090  
www.stevenslee.com

Direct Dial: (717) 255-7366  
Email: timothy.mchugh@stevenslee.com  
Direct Fax: (610) 236-4177

August 13, 2021

**VIA ELECTRONIC MAIL**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17120

**RE: John Solomond v. Pennsylvania-American Water Company  
Docket No. C-2021-3027149**

Dear Secretary Chiavetta:

Enclosed for filing on behalf of Pennsylvania-American Water Company is its Answer to Complainant's Motion to Add Sherwood Spring Property Holdings, LLC as Complainant in the above-referenced matter. A copy of the Answer has been served in accordance with the attached Certificate of Service.

If you have any questions, please feel free to contact me.

Best Regards,

STEVENS & LEE



Timothy K. McHugh

Enclosure

cc: Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

JOHN SOLOMOND	:	
Complainant	:	
	:	
v.	:	Docket No. C-2021-3027149
	:	
PENNSYLVANIA-AMERICAN	:	
WATER COMPANY	:	
Respondent	:	

**PENNSYLVANIA-AMERICAN WATER COMPANY’S  
ANSWER TO COMPLAINANT’S MOTION  
TO ADD COMPLAINANT**

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Pursuant to 52 Pa. Code § 5.61 of the Pennsylvania Public Utility Commission’s (“Commission”) regulations, Pennsylvania-American Water Company (“PAWC” or “Company”), by and through the undersigned counsel, hereby submits its Answer to John Solomond’s (“Complainant”) Motion to Add Sherwood Spring Property Holdings, LLC (“Sherwood Spring”) as a Complainant (“Motion”) to the above-captioned proceeding. In further support, PAWC submits as follows:

1. Denied. Respondent, PAWC, denies that either Complainant or Sherwood Spring is a customer of PAWC or receives water service from PAWC at 717 Sherwood Avenue, Pittsburgh, PA 15204 (“Property”). By way of further answer, PAWC provides water service to Ladonna Macon (“Account Holder”) at the Property. Neither the Complainant nor Sherwood Spring is authorized to speak on the Account Holder’s behalf regarding her account with PAWC for water service at the Property. PAWC also denies that Complainant or Sherwood Spring is a “landlord” of PAWC.

2. Denied. In its Formal Complaint, Complainant requests that the Commission require PAWC to terminate the Account Holder’s water service at the Property. Neither

Complainant nor Sherwood Spring is a customer of PAWC, nor is either authorized to speak on behalf of the Account Holder regarding her account for water service with PAWC at the Property. Furthermore, Sherwood Spring is not an individual. As such, it must have counsel in order to proceed in any legal action before the Commission because a business entity may not represent itself. *See Cars R Us c/o Holman Copeland, v. Philadelphia Gas Works*, Docket No. C-2008-2033437 (Order entered February 4, 2010); *see also Sherwood Springs Property Holdings, LLC v. Pittsburgh Water and Sewer Authority and Pennsylvania-American Water Company*, Docket No. C-2018-3004826 (Order entered November 27, 2018). Despite Complainant alleging otherwise in his Formal Complaint, PAWC has not filed a lien on the Property or threatened to file a lien on the Property. Therefore, Complainant's Motion should be denied because neither Complainant nor Sherwood Spring has a direct, immediate, and substantial interest in the Account Holder's account with PAWC for water service at the Property.

3. Denied. Complainant and Sherwood Spring lack standing to file a Complaint on behalf of the Account Holder regarding her account with PAWC for water service at the Property. Therefore, the Formal Complaint filed against PAWC by Complainant should be dismissed, and, similarly, the Complainant's Motion should be denied.

4. Denied. The Formal Complaint and the Motion filed by the Complainant should both be denied because the Complainant lacks standing. Complainant is not a customer of PAWC nor is he authorized to speak on behalf of the Account Holder regarding her account with PAWC for water service at the Property.

WHEREFORE, for all of the reasons stated herein, Respondent Pennsylvania-American Water Company respectfully requests that the Complainant's Motion to Add Sherwood Spring as a Complainant be denied.

Respectfully submitted,

STEVENS & LEE



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Timothy K. McHugh  
Attorney I.D. 317906  
17 N. 2<sup>nd</sup> St., 16<sup>th</sup> Floor  
Harrisburg, PA 17101  
Tel. (717) 255-7366  
Fax (610) 236-4177  
[timothy.mchugh@stevenslee.com](mailto:timothy.mchugh@stevenslee.com)  
COUNSEL FOR PENNSYLVANIA  
AMERICAN WATER COMPANY

DATE: August 13, 2021


**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

JOHN SOLOMOND	:	
Complainant	:	
	:	
v.	:	Docket No. C-2021-3027149
	:	
PENNSYLVANIA-AMERICAN	:	
WATER COMPANY	:	
Respondent	:	

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing Answer to Complainant's Motion upon the party listed below, in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a party).

**VIA Electronic Mail**  
John Solomond  
9025 Copperleaf Lane  
Fairfax Station, VA 22039  
johnsolomond@gmail.com

  
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Timothy K. McHugh

August 13, 2021