

PENNSYLVANIA PUBLIC UTILITY COMMISSION

SHEILA WEAVER t/d/b/a
ENTERPRISE 22, LLC,

Complainant,

v.

AQUA PENNSYLVANIA
WASTEWATER, INC.,

Respondent.

Docket No.: C-2021-3028959

**SHEILA WEAVER'S ANSWER TO
AQUA PENNSYLVANIA WASTEWATER, INC.'S NEW MATTER**

Complainant Sheila Weaver t/d/b/a Enterprise 22, LLC (“Complainant” or “Ms. Weaver”), by and through her undersigned counsel, hereby responds to the new matter filed by Respondent Aqua Pennsylvania Wastewater, Inc. (“Respondent” or “Aqua”) to Complainant’s formal complaint, as follows:

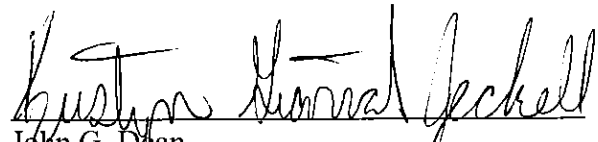
11. Denied. The planning module is a written document which speaks for itself and any characterization of its contents by Respondent is specifically denied. By way of further response and to the extent such a response is required, the planning module is allegedly no longer “valid” according to Respondent alone because Respondent abandoned the sewer line to which Complainant’s subdivision was going to be attached, despite being aware of Complainant’s plan to attach to the sewer line. By way of further response, the remaining averments contained in this paragraph consist of legal conclusions to which no responsive pleading is required. To the extent such a response is required, same is specifically denied.

12. Denied. The averments contained in this paragraph consist of legal conclusions to which no responsive pleading is required. To the extent such a response is required, same is specifically denied.

13. Denied. Complainant's formal complaint is a written document which speaks for itself and any characterization of its contents by Respondent is specifically denied.

WHEREFORE, Complainant Sheila Weaver t/d/b/a Enterprise 22, LLC demands that judgment be granted in her favor.

Respectfully submitted,



John G. Dean

Kristyn Giarratano Jeckell

ELLIOTT GREENLEAF & DEAN

15 Public Square, Suite 310

Wilkes-Barre, PA 18701

Attorneys for Complainant

DATED: November 9, 2021

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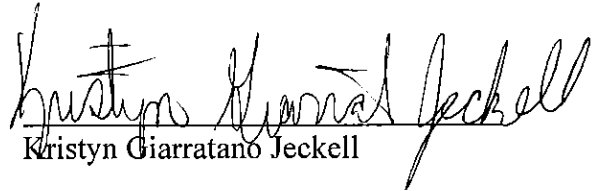
Respondent.

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CERTIFICATE OF SERVICE

I, KRISTYN GIARRATANO JECKELL, hereby certify that I have caused to be served on this day a true and correct copy of the foregoing Complainant's response to Respondent's new matter to Complainant's formal complaint on the following via electronic mail addressed as follows:

Margaret A. Morris, Esq.
Reger Rizzo & Darnall LLP
Cira Centre, 13th Floor
2929 Arch Street
Philadelphia, PA 19104
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Attorney for Respondent


Kristyn Giarratano Jeckell

DATED: November 9, 2021