

BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCKET NO: C-2022-3036138

EDGAR N. PERSONS III

V.

AQUA PENNSYLVANIA, INC.

ANSWER TO AQUA'S NEW MATTER

11. ADMITTED IN PART. DENIED THAT AQUA WAS ENTITLED TO BILL FOR SERVICES NOT RENDERED.

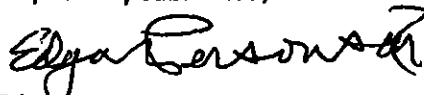
12. ADMITTED IN PART. DENIED THAT THE APPROVED TARIFF ENTITLED AQUA TO BILL FOR SERVICES NOT RENDERED.

13. DENIED THAT CLAIMANT IS SEEKING TO HAVE AQUA BILL HIM A DIFFERENT RATE. CLAIMANT ONLY SEEKS TO HAVE AQUA NOT BE ABLE TO BILL HIM FOR SERVICES NOT RENDERED.

14. DENIED THAT CLAIMANT IS SEEKING TO HAVE AQUA BILL HIM AT A DIFFERENT RATE. CLAIMANT IS ONLY SEEKING TO HAVE AQUA NOT BILL HIM FOR SERVICES NOT RENDERED.

WHEREFORE, FOR THE ABOVE REASONS, CLAIMANT REQUESTS THAT AQUA BE ORDERED TO ONLY CHARGE CLAIMANT FOR SERVICES ACTUALLY RENDERED.

Respectfully submitted,



Edgar N. Persons III
520 Raspberry Lane
West Chester, Pa. 19382

Dated: November 11, 2022

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RCVD PUC SEC BLR
NOV 15 2022 AM 11:38

DOCKET NO: C-2022-3036138

NOTICE TO PLEAD


Pursuant to Pa. Code Sec.5.63, you are hereby notified that unless you file a written response to Complainant's Requests for Admissions, Request for Production of Documents, and Answer the Interrogatories within 20 days from service of this notice, Judgment may be entered against Aqua as requested in this Complaint. All pleadings must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy served to the Claimant.

File With

Secretary Rosemary Chiavetta
Pennsylvania Public Utility Commission
Commonwealth Keystone Building – 2 North
PO Box 3265
Harrisburg, Pa. 17105

with a copy to:

Edgar N. Persons III
520 Raspberry Lane
West Chester, Pa. 19382


Edgar N. Persons III
520 Raspberry Lane
West Chester, Pa. 19382

DATED: NOVEMBER 11, 2022

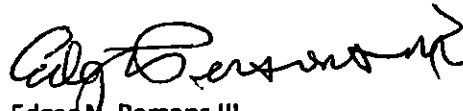
BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCKET NO. C-2022-3036138

INTERROGATORIES TO AQUA PENNSYLVANIA ,INC.

1. How many residential customers does Aqua serve in the Commonwealth of Pennsylvania?
2. How many of those customers have meters on their wastewater/sewer systems monitored by Aqua?
3. Does Aqua charge all of those residential customers as if all of the water delivered to said customer is discharged through Aqua's wastewater/sewer system



Edgar W. Persons III
520 Raspberry Lane
West Chester Pa. 19382

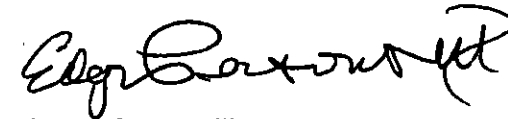
Dated: November 11, 2022

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCKET NO: C-2022-30361338

REQUEST FOR ADMISSIONS

1. Aqua has no meter or other device to accurately measure the amount of wastewater Claimant introduces into Aqua's wastewater/sewer system.
2. Aqua is aware that Claimant's water use goes up markedly in the growing season.
3. Aqua is aware that water used to water Claimant's lawn does not enter its wastewater/sewer system.
4. Despite this knowledge, Aqua bills Claimant as if all of the water it delivers to Claimant is routed through its wastewater/sewer system.
5. This practice allows Aqua to charge Claimant for services that it does not render.



Edgar N. Persons III
520 Raspberry Lane
West Chester, Pa. 19382

Dated: November 11, 2022

RCVD PUC SEC BUR
NOV 15 2022 09:11:39

BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

REQUEST TO PRODUCE

DOCKET NO. C-2022-3036138

1. Produce any and all records Aqua has documenting conversations between Edgar N. Persons III and Aqua representatives on September 29, 2022 and October 4, 2022 and October 6, 2022.

2. Produce any and all documents in Aqua's possession that specifically permits Aqua to charge for services not rendered.



Edgar N. Persons III
520 Raspberry Lane
West Chester, Pa. 19382

Dated: November 11, 2022

VERIFICATION

RCVD PUC SEC BUR
NOV 15 2022 09:11:09

I, Edgar N. Persons III hereby state that the facts and allegations set forth in Claimant' original Formal Complaint and his answer to new matter are true and correct to the best of my knowledge, information and belief and I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. sec 4904 (relating to unsworn falsification to authorities.



Edgar N. Persons III
520 Raspberry Lane
West Chester, Pa. 19382

Dated: November 11, 2022

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RCUD PUC SEC BUR
NOV 15 2022 AM 11:38

EDGAR N. PERSONS III

DOCKET NO: C-2022-3036138

VS.

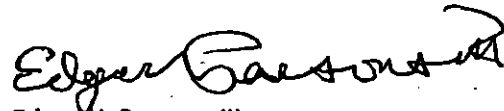
AQUA PENNSYLVANIA, INC.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing documents, Claimant's Answer to Aqua's New Matter along with Claimant's Interrogatories, Request to Produce and Request for Admissions in the manner set forth below.

Via USPS Mail

Mary McFall Hopper, Esquire
762 W. Lancaster Avenue
Bryn Mawr, Pa. 19010



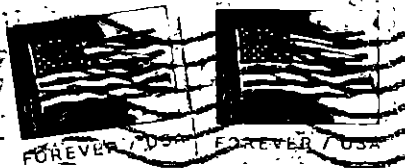
Edgar N. Persons III
520 Raspberry Lane
West Chester, Pa. 10382

Dated: November 11, 2022P

Edgar N. Persons III
520 Raspberry Lane
West Chester, PA 19382

WILMINGTON DE 197

12 NOV 2022 PM 3 1



Secretary Rosemary Chiavetta
Pennsylvania Public Utility Commission
Commonwealth Keystone Building - 2 North
PO Box 3265
Harrisburg, PA 17105

17105-3265 85

