

**Edgar N. Persons III**

**December 2, 2022**

**Via USPS MAIL**

**Rosemary Chiavetta, Esquire  
PA. Public Utility Commission  
Secretary  
P.O. Box 3265  
Harrisburg, Pa. 17105-3265**

**DATE OF DEPOSIT**

**DEC -2 2022**

**PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU**

**Re: Persons vs. Aqua Pa.**

**Docket No. C-2022-3036138**

**Dear Secretary Chiavetta:**

**Enclosed please find copies of Pleadings I have filed in the above matter along with correspondence I have had with Attorney's for Aqua to date.**

**I have received the notice of the Telephonic Hearing set for Friday, March 10, 2023 and am  
Ready to participate in same.**

**As I am not as Tech savvy as is required for handling Discovery, Pleadings, etc electronically, I will be  
Using the USPS Mail for all of my written material.**

**Very truly yours,**

**Edgar N. Persons III**

**Enc.**

**Cc: Attorney Margaret A. Morris**

**Edgar N. Persons III**

**Margaret A. Morris Esq.  
Cira Centre 13<sup>th</sup> Floor  
2929 Arch Street  
Philadelphia, Pa. 19104**

**DATE OF DEPOSIT**

**DEC -2 2022**

**PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU**

**Re; Persons vs. Agua Pa.**

**Docket No. C-2022-3036138**

**Dear Ms. Morris:**

**Enclosed find a copy of the Documents I filed on November 11, 2022 on Attorney Mary McFall Hopper via USPS mail.**

**This will confirm our discussion on December 1<sup>st</sup>, 2022 wherein I agreed you may have a reasonable extension of time to respond to those documents as Attorney Hopper did not supply them to you.**

**Should you have any questions or concerns, do not hesitate to contact me by phone or e-mail.**

**As I explained to you, I am not tech savvy and prefer to use paper and the USPS mail to exchange Documents, Pleadings, etc.**

**Thank you for your courtesy in understanding my preferences.**

  
**Edgar N. Persons III**

**520 Raspberry Lane**

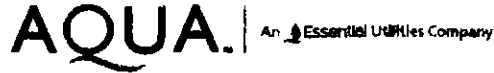
**West Chester Pa. 19382**

**Enc.**

DATE OF DEPOSIT

DEC - 2 2022

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU



Service To:  
**EDGAR N. PERSONS III**  
**520 RASPBERRY LN**  
**WEST CHESTER, PA 19382-2251**

Account Number  
**000460170 0398713**  
MAIN DIVISION  
1101010 PWSID # PA1460073

**Aqua Pennsylvania, Inc.**  
762 W. Lancaster Avenue  
Bryn Mawr, PA 19010-3489

Toll Free: **877.987.2782**  
Fax: **866.780.8292**  
**AquaAmerica.com**

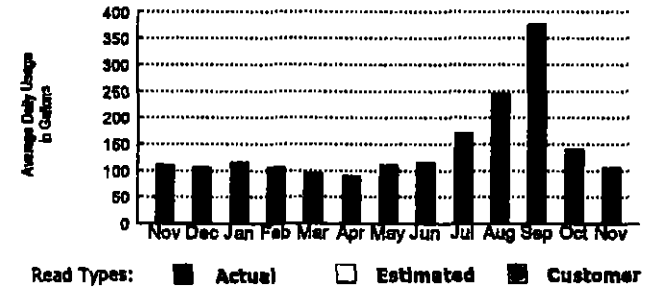
Questions about your water/sewer service? Contact us before the due date.  
Bill Date **November 28, 2022** Total Amount Due **\$ 159.86** Current Charges Due Date **December 20, 2022**

Meter Data	Meter	Size	Billing Period	Days	Read Type	Meter Readings	Usage	Units
	18312766	5/8	11/22/22	32	Actual	252400	3,400	Gallons
			10/21/22		Actual	249000		
Average Daily Usage = 106 Gallons			Total Days: 32		Total Usage:		3,400	Gallons

**Billing Detail**

Amount Owed from Last Bill .....	\$ 190.23	
Total Payments Received .....	190.23	
Remaining Balance .....	0.00	
Customer Charge Water .....	20.51	
2,000 gallons @ \$0.01305 per gallon.....	26.10	
Next 1,400 gallons @ \$0.015451 per gallon.....	21.63	
Current Water Charges.....	68.24	
Customer Charge Sewer.....	57.61	
3,400 gallons @ \$0.011737 per gallon .....	39.91	
Current Sewer Charges.....	97.52	
May/June Rate Case Adjustment - Water .....	1.87	
May/June DSIC Adjustment - Water .....	4.37	Credit
May/June DSIC Adjustment - Wastewater .....	3.40	Credit
<b>Amount Due.....</b>	<b>\$ 159.86</b>	

**Water Usage History**



**Message Center** (see reverse side for other information)

- Your bill may contain a Rate Case Adjustment and Distribution System Improvement Charge Credit. They reflect an adjustment for the period between when Aqua's new rates were effective on 5.19.2022 and when they were implemented, 6.20.2022. Learn more at <https://www.aquaamerica.com/our-states/pennsylvania>
- Your bill may contain a Rate Case Adjustment and Distribution System Improvement Charge Credit. They reflect an adjustment for the period between when Aqua's new rates were effective on 5.19.2022 and when they were implemented, 6.20.2022. Learn more at <https://www.aquaamerica.com/our-states/pennsylvania>

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# East Bradford

## TOWNSHIP NEWSLETTER

CHESTER COUNTY, PENNSYLVANIA

FALL 2022 • WWW.EASTBRADFORD.ORG

MAGGIE CANTLIN 610 436-5108

### Aqua PA Increases Rates

In May, the Pennsylvania Public Utility Commission (PUC) approved water and wastewater (sewer) increases for Aqua Pennsylvania across its territory. According to the PUC's press release, the Commission voted to approve an increase in annual revenue of approximately \$50.510 million (9.88%) for Aqua's water service and an increase in annual revenue of approximately \$18.741 million (50.55%) for wastewater service. The approved amounts are approximately 30% lower than what Aqua originally requested.

In East Bradford, most residents with public sewer will notice a shift from a fixed rate to a variable rate based on water usage (those on well will move to a higher fixed rate). By way of example, an average household that uses about 4,000 gallons per month will increase from a fixed rate of \$71.49 to a rate of about \$104.00.

Residents should understand that how much water you use will now affect the cost of your sewer bill. Watering the garden or yard will increase the sewer bill, even though the water is not going into the sewer system.

### Volunteers Needed

Every year we have openings on our various boards and committees. If you are interested in serving on one of our boards or committees or want to learn more about what is involved, contact Township Manager Mandie Cantlin at 610-436-5108 x101 or mcantlin@eastbradford.org.

### 2022 Trail Blazer Run Report

The 9th annual Trail Blazer Run took place on Thursday, June 16th on the scenic grounds of the CCWA Paradise Farm Camps property. By the 6:30 pm race start, conditions were dry and not too warm, making an ideal environment for the runners! There were over 200 participants and 40 volunteers - good numbers considering that the run was making its return after two years of cancellation due to the Covid-19 pandemic. Mr. Jared Murphy (31:22) and Ms. Kara Rubinich (35:56) were the top male and female finishers, respectively. Congrats and many thanks to all who participated in the 5-mile run and the 1.5-mile fun run!



The event would not have been possible without the many local businesses, sponsors, and donors who provided financial support and materials for the run. Top-level sponsors in 2022 were ACE Hardware of West Chester, Kit Anstey Real Estate, CCWA Paradise Farm Camps, In-Fleet Truck Service, Artillery Brewing Company, A.J. Blosenski Trash & Recycling, Gilmore & Associates, Inc., Carroll Engineering Corporation, R.H. Reinhardt Co., Unruh, Turner, Burke & Frees, Malvern Bank National Association, and Brandywine Valley Heating & Air Conditioning. Thank you to all of the Trail Blazer Run sponsors and we hope to keep earning your support in 2023!

Congratulations and thanks once more to all of the volunteers and runners who participated in this year's Trail Blazer Run. The event raised \$10,500 that will go towards several of the Township's ongoing public trail initiatives. On behalf of the Township Trails Committee, we will see you in 2023 and keep on blazing! ●

### INSIDE THIS ISSUE

PAGE 2 Honoring Township Heros

PAGE 10 A.J. Blosenski Continues as Refuse/Recycling Contractor for 2023-2025

BEFORE THE

DATE OF DEPOSIT

PENNSYLVIA PUBLIC UTILITY COMMISSION

DEC 2 2022

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

EDGAR N. PERSONS III

DOCKET NO. C-2022-3036138

VS.

AQUA PENNSYLVANIA, INC

CERTIFICATE OF SERVICE

I hereby certify that I have on 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

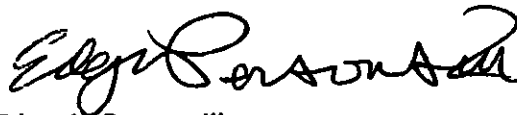
December 2, 2022

Margaret A. Morris Esq.

Cira Centre 13<sup>th</sup> Floor

2929 Arch Street

Philadelphia, Pa. 19104



Edgar N. Persons III

520 Raspberry Lane

West Chester, Pa. 19382

CC: Pennsylvania Public Utility Commission

DATE OF DEPOSIT

BEFORE THE

DEC 2 2022

PENNSYLVANIA PUBLIC UTILITY COMMISSION

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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.

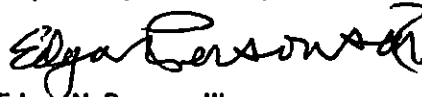
12. ADMITTED IN PART. DENIED THAT THE APPROVED TARIFF ENTITLED AQUA TO BILL FOR SERVICES NOT RENDERED.

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

DATE OF DEPOSIT

DEC -2 2022

BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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, Judgement 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

DATE OF DEPOSIT

DEC - 2 2022

BEFORE THE

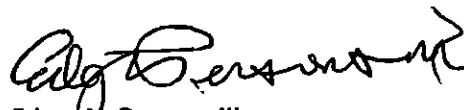
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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

Dated: November 11, 2022

DATE OF DEPOSIT

BEFORE THE

DEC -2 2022

PENNSYLVANIA PUBLIC UTILITY COMMISSION

PA PUBLIC UTILITY COMMISSION

SECRETARY'S BUREAU

DOCKET NO: C-2022-30361338

**REQUEST FOR ADMISSIONS**

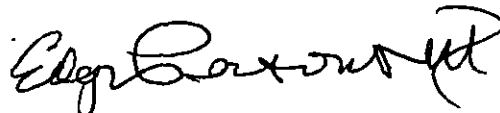
1. Aqua has no meter or other device to accurately measure the amount of wastewater Claimant introduces into Aqua's wastewater/sewer system.

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

DATE OF DEPOSIT

BEFORE THE

DEC - 2 2022

PENNSYLVANIA PUBLIC UTILITY COMMISSION

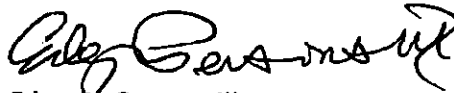
PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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

DATE OF DEPOSIT

DEC -2 2022

VERIFICATION

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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

DATE OF DEPOSIT

DEC -2 2022

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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

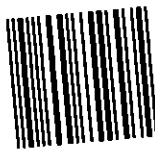
Dated: November 11, 2022P



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520 RASPBERRY LN  
WEST CHESTER PA 19382  
SECRETARY'S BUREAU EL 418573977 US



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HARRISBURG PA 17105-3265

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Time Accepted 1:16 <input checked="" type="checkbox"/> AM <input checked="" type="checkbox"/> PM	10:30 AM Delivery Fee \$ -	Return Receipt Fee \$ -	Live Annual Transportation Fee \$ -
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