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December 29, 2022

Via Electronic Filing

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

Re: SCH USA, LLC v. Aqua Pennsylvania Wastewater, Inc.
Docket No. C-2022-3036893

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Reply of SCH USA, LLC to New Matter of Aqua Pennsylvania Wastewater, Inc. with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

/s/ Lauren M. Burge

Lauren M. Burge

Enclosure

Cc: Cert. of Service w/enc.

CERTIFICATE OF SERVICE

I 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

Margaret A. Morris, Esq.
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Hon. Charles E. Rainey, Jr.
Chief Administrative Law Judge
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120
bobbwillia@pa.gov

Date: December 29, 2022

/s/ Lauren M. Burge

Lauren M. Burge, Esq.
Attorney for SCH USA, LLC

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

SCH USA, LLC,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2022-3036893
	:	
Aqua Pennsylvania Wastewater, Inc.,	:	
	:	
Respondent.	:	
	:	

**REPLY OF SCH USA, LLC TO NEW MATTER
OF AQUA PENNSYLVANIA WASTEWATER, INC.**

Pursuant to 52 Pa. Code § 5.63 of the Pennsylvania Public Utility Commission’s (“PUC” or “Commission”) regulations, SCH USA, LLC (“SCH USA”) files this Reply to the New Matter of Aqua Pennsylvania Wastewater, Inc. (“Aqua” or “Company”). In support hereof, SCH USA avers as follows:

REPLY TO NEW MATTER

11. Denied. By way of further response, the Complaint alleges, *inter alia*, that Aqua is incorrectly charging SCH USA’s accounts based on the number of Equivalent Dwelling Units (“EDU”) included in a Settlement Agreement to which neither SCH USA nor Aqua were a party, rather than applying the definition of EDU contained in Aqua’s tariff. The number of EDUs identified in that Settlement Agreement is outdated, inaccurate and arbitrary, as is does not accurately reflect either the number of EDUs that SCH USA actually acquired when it purchased the property, or the number of EDUs for which SCH USA is currently receiving wastewater service. Aqua has never explained how the definition of EDU in its tariff is being applied to SCH USA, despite the Complainant’s requests for such an explanation. As a result, SCH USA is being charged inaccurately in violation of Aqua’s tariff.

12. It is admitted that the three accounts are billed pursuant to Aqua's Rate Zone 4 Tariff. By way of further response, the reply to Paragraph 11 above is incorporated herein by reference.

CONCLUSION

WHEREFORE, SCH USA, LLC respectfully requests that the Commission dismiss Aqua's New Matter, sustain the Complaint and grant such other relief as may be deemed appropriate.

Respectfully submitted,

/s/ Lauren M. Burge

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Date: December 29, 2022

Attorneys for SCH USA, LLC

VERIFICATION

I, Carlos R. Padilla, hereby state that: (1) I am the Senior Counsel for SCH USA, LLC (“SCH USA”); (2) the facts set forth in SCH USA’s Reply to New Matter are true and correct (or are true and correct to the best of my knowledge, information and belief); and, (3) 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. § 4904 (relating to unsworn falsification to authorities).

December 29, 2022

Dated

/s/ Carlos R. Padilla

Carlos R. Padilla
Senior Counsel
SCH USA, LLC