

BEFORE THE PENNSYLVANIA UTILITY COMMISSION

KRIEBEL MINERALS, INC. AND	:	
ERD ENERGY LLC	:	
	:	Docket No. C-02023-3041055
Petitioners,	:	
	:	
v.	:	
	:	FORMAL COMPLAINT
WEST PENN POWER,	:	
	:	
Respondent.	:	

PETITIONERS’ REPLY TO RESPONDENT’S NEW MATTER

AND NOW, comes Petitioners Kriebel Minerals, Inc. and ERD Energy, LLC, by and through their undersigned counsel to file their Reply to the New Matter of Respondent West Penn Power, and aver as follows:

REPLY TO NEW MATTER

29. Admitted with clarification. It is admitted the instant dispute between the parties is such that early resolution is appropriate. Furthermore, it is admitted such early resolution should be conducted remotely via telephone in order to decrease the burden on and costs to the parties.

30. Admitted.

31. Admitted with clarification. It is admitted the instant dispute between the parties is such that early resolution is appropriate. Furthermore, it is admitted such early resolution should be conducted remotely via telephone in order to decrease the burden on and costs to the parties.

32. Admitted with clarification. Furthermore, it is admitted such early resolution should be conducted remotely via telephone in order to decrease the burden on and costs to the parties, and this matter should be referred to mediation before the Office of Administrative Law Judge’s Mediation Unit.

Respectfully submitted,

SAXTON & STUMP LLC

Dated: June 27, 2023

By:

A handwritten signature in black ink, appearing to read "Kathy L. Pape", with a long horizontal flourish extending to the right.

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*Counsel for Kriebel Minerals, Inc.
and ERD Energy, LLC*

CERTIFICATE OF SERVICE

I, Kathy L. Pape, Esquire, certify that on this date, I served a certified true and correct copy of the foregoing *Petitioners' Reply to Respondent's New Matter* upon the following counsel and parties of record, via email only, addressed as follows:

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Counsel for West Penn Power Company

SAXTON & STUMP LLC

Dated: June 27, 2023

By:

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Kathy L. Pape, Esquire