

COMMONWEALTH OF PENNSYLVANIA  
BEFORE THE PUBLIC UTILITY COMMISSION

In the Matter of:	:	
	:	
ARIELLE SAGBOHAN,	:	
	:	
Complainant,	:	
v.	:	Docket No. C-2023-3042548
	:	
WEST PENN POWER COMPANY,	:	
	:	
Respondent.	:	

**REPLY TO NEW MATTER OF WEST PENN POWER COMPANY**

AND NOW COMES Complainant, Arielle Sagbohan (“Complainant”), by and through her undersigned counsel, and files in the above-captioned action the within REPLY TO NEW MATTER OF WEST PENN POWER COMPANY, stating as follows:

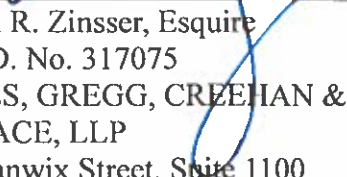
**REPLY TO NEW MATTER**

12. Paragraph 12 of the Answer and New Matter of West Penn Power Company to the Complaint of Arielle Sabahan constitutes a conclusion of law to which no response is required; and if deemed to be required, is denied. By way of further response, Paragraph 9 of the Complaint filed in this matter clearly states Complainant was represented by Attorney David L. Nixon at the time of its’ filing; and since that time the undersigned Counsel has entered his appearance upon Complainant. Accordingly, Respondent’s New Matter is moot and without merit.

WHEREFORE, Complainant, Arielle Sagbohan, hereby respectfully requests the relief sought in the Complaint filed by Complainant in this case be granted, and the relief sought by Respondent in its Answer and New Matter be denied with prejudice.

Dated: September 28, 2023

Respectfully submitted,

  
Adam R. Zinsser, Esquire  
PA I.D. No. 317075  
JONES, GREGG, CREEHAN &  
GERACE, LLP  
20 Stanwix Street, Suite 1100  
Pittsburgh, PA 15222  
Phone: (412) 261-6400  
Email: [arz@jgcg.com](mailto:arz@jgcg.com)

Counsel for Complainant,  
Arielle Sagbohan

**CERTIFICATE OF SERVICE**


I hereby certify that a true and correct copy of the foregoing REPLY TO NEW MATTER OF WEST PENN POWER COMPANY has been served this 28<sup>th</sup> day of September, 2023 upon the following parties, in the manner indicated below, in accordance with the requirements of 52 Pa. Code § 1.54:

Margaret A. Morris, Esquire  
Reger Rizzo & Darnall LLP  
Cira Center, 13<sup>th</sup> Floor  
2929 Arch Street  
Philadelphia, PA 19104  
[mmorris@regerlaw.com](mailto:mmorris@regerlaw.com)

*Counsel for Respondent, West Penn Power Company*  
**Service via email and e-filing notification**

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

**Service via U.S. Mail and e-filing notification**



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Adam R. Zinsser, Esquire  
PA I.D. No. 317075  
JONES, GREGG, CREEHAN &  
GERACE, LLP  
20 Stanwix Street, Suite 1100  
Pittsburgh, PA 15222  
Phone: (412) 261-6400  
Email: [arz@jgcg.com](mailto:arz@jgcg.com)

Counsel for Complainant,  
Arielle Sagbohan