

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

VERA SCROGGINS	:	
Complainant	:	
v.	:	Docket No. C-2023-3039609
PENNSYLVANIA -AMERICAN	:	
WATER COMPANY	:	
Respondent	:	

**ANSWER TO MOTION FROM
PENNSYLVANIA-AMERICAN WATER COMPANY
TO STRIKE ADDITIONAL AMENDED FORMAL COMPLAINT**

AND NOW, Vera Scroggins, as pro se, as complainant, hereby files this Motion to request that the Additional Amended Formal Complaint of Vera Scroggins (hereinafter "Vera") be not stricken as requested by Pennsylvania-American Water Company (hereinafter "PAWC").

**Now Responding to Some of the Points, as numbered by Respondent in
their motion as follows:**

11. During the argument on PAWC's Preliminary Objections, during our January 22, 2025 telephonic conference, Vera did not confirm that she was not a customer of PAWC. Vera confirms that she is a customer of PAWC.

Vera Scroggins is a customer of PAWC and on the account, along with Craig Stevens. My PAWC Account Number is 1024-210033850897.

12. I object to the allegation and deny that I filed an "Additional Amended Formal Complaint" for the sole purpose of "adding Craig Stevens" because of our shared concerns about gas drilling impacts from Lake Montrose, Montrose, Pa..

13. I deny that Vera is "attempting to leverage Mr. Stevens' status as a PAWC customer to cure my lack of standing" to ask Mr. Stevens to join me as an additional Complainant.

14. Vera denies circumventing principles for legal standing. I am asking to add Craig Stevens, as co-customer of PAWC, on the above-mentioned account, to add his voice to the issues Vera has presented in her original Formal Complaint. Mr. Stevens was not allowed to speak on the telephonic conference in January. I am adding him to my Formal Complaint to allow for Mr. Stevens to contribute his concerns to this on-going Formal Complaint before the PUC.

15. Vera is pro se, and not aware of any legal protocol to add Mr. Stevens to my on-going Amended Formal Complaint. I apologize for any improper filing of Mr. Stevens. If Mr. Stevens needs to file a petition to intervene and

serve that petition, then he will do so, if such is required. Vera is asking if such is required based on what PAWC is alleging.

16. Vera Denies that Additional Amended Formal Complaint was intended to rebut arguments from PAWC's Preliminary Objections.

18. Vera denies that my purpose for adding Mr. Stevens name to my Amended Formal Complaint is to render "PAWC's Preliminary Objections moot".

20. Vera is simply adding Mr. Stevens name to my Complaint to allow him to speak at any future telephonic conferences as a co-customer of our PAWC customer account.

24. Vera is again explaining to the PUC and alleging that PAWC needs to further prove that PAWC is supplying safe water to its customers. Vera is asking the PUC to stand by its good intentions to allow a Utility to supply a safe product to its customers.

26. Vera and Mr. Stevens assert their concerns that the impacts of the Gas industry in and around Lake Montrose, Pa., may be polluting or adversely affecting the safety and quality of the water that PAWC is supplying its customers. This serious concern needs to be addressed.

27. Vera asserts that these concerns of water quality safety and quality are within the Commission's jurisdiction, since the Commission, PUC, is asserting in their regulations that Utility customers must receive a safe product.

28. Water purity and quality in Pennsylvania is statutorily regulated by the DEP and EPA. Vera is asserting that since Montrose and Susquehanna County, Pa. have been seriously industrialized since 2008 by the Gas Industry, further assessments by the DEP and EPA need to be conducted and further comprehensive testing for an industrialized area needs to be arranged and conducted by PAWC to assure the safety and quality of the water they treat and supply. Also, Vera is requesting more transparency to the public by making available all the PAWC water testing and water test results to the public.

29. Vera is requesting the PUC to inform the DEP and EPA of my concerns and request a new assessment of the possible impacts of the Gas Industry surrounding Lake Montrose, Pa. and require more testing of an industrialized area. Radiums, Radioactive constituents, need special attention and more frequent testing than every nine years.

30. Vera is requesting that the PUC not consider my Additional Amended Formal Complaint defective and decide to have it stricken. If additional changes need to be made or additional petition needs to be presented, then Vera requests to be informed of this and be allowed to comply with the PUC decision for such.

The PUC can expand its powers, jurisdiction and oversight.

As with this example in 2011: ACT 127 – THE PIPELINE ACT. Signed into law Dec. 22, 2011, the Gas and Hazardous Liquids Pipelines Act expanded the Pennsylvania Public Utility Commission’s (PUC) authority to enforce the federal pipeline safety laws as they relate to non-public utility gas and hazardous liquids pipeline equipment and facilities within the state.

I am, therefore, asking the PUC to expand its oversight on the PAWC to better test and reveal their test results to the public to assure us of the safety of our water.

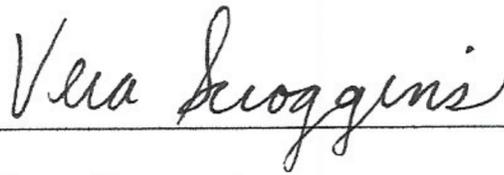
Thank you for your attention to this matter.

Attached Exhibit 1 : Additional Amended Formal Complaint

REQUEST FOR RELIEF

WHEREFORE, for all the reasons stated herein, Complainant, Vera Scroggins, respectfully requests that the Respondent Pennsylvania-American Water Company's request to have Complainant's Additional Amended Formal Complaint not be stricken. And that any changes to my Additional Amended Formal Complaint be allowed and any suggestions for changes be allowed by the PUC Judge.

Respectfully submitted,



Vera Scroggins, pro se

71 Gus Park Lane

Brackney, Pa. 18812

607-237-9685

veraduerga@gmail.com

DATE: February 13, 2025

**C-2023-3039609 – VERA SCROGGINS v. PENNSYLVANIA AMERICAN
WATER COMPANY**

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of **ANSWER TO
MOTION FROM Vera Scroggins to
PENNSYLVANIA-AMERICAN WATER COMPANY
TO STRIKE ADDITIONAL AMENDED FORMAL COMPLAINT**

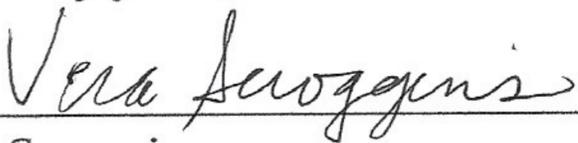
with Exhibit 1 upon the parties listed below.

eService to all

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very truly yours,



Vera Scroggins
71 Gus Park Lane, Brackney, Pa. 18812
607-237-9685
Dated: February 13 , 2025

EXHIBIT 1

Vera Scroggins docket no.
C-2023-3039609

1. I am adding Craig Stevens to my Amended Formal Complaint. He is the primary name on the account with PAWC, which also has my name on it. The account number is 1024-210033850897, which is the same one I am on.
2. Craig Stevens wants to add to the testimony and concerns about the safety of the PAWC – supplied water in Montrose, Pa., Susquehanna County.

Craig Stevens is also concerned about possible gas drilling impacts to the water which is extracted from Lake Montrose in Montrose, Pa., 18801.

I have written to representatives in PAWC with my questions and concerns and Craig Stevens, my neighbor, has also written to PAWC with concerns and we have not been assured to our satisfaction of the water's safety relating to the proximity of gas wells and gas production near Montrose Lake Treatment Plant. We have at least six well pads with several gas wells surrounding Lake Montrose within two to three miles.

Thank you for your consideration and help,

Sincerely,

Vera Scroggins

Vera Scroggins
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1-22-25

Craig Stevens

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