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April 23, 2025

Via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: *Moravian Manors, Inc. v. nTherm, LLC*
Docket No. C-2025-3053949

Dear Secretary Chiavetta:

Enclosed for electronic filing in the above-referenced proceeding is Moravian Manor, Inc.'s Reply to New Matter. Copies will be provided as indicated in the Certificate of Service.

Respectfully submitted,



Matthew M. Hennesy

MMH/slr
Enclosures

CERTIFICATION OF SERVICE

I hereby certify that on this date, a true and correct copy of the foregoing Reply to New Matter was served via electronic mail upon the following counsel of record addressed as follows:

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BARLEY SNYDER LLP

Date: April 23, 2025

By: /s/ Matthew M. Hennesy
Matthew M. Hennesy, Esq. (ID No. 302070)
126 East King Street
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Attorney for Moravian Manors, Inc.

<p>MORAVIAN MANORS, INC.,</p> <p style="text-align: center;"><i>Complainant</i></p> <p style="text-align: center;">v.</p> <p>NTHERM, LLC</p> <p style="text-align: center;"><i>Respondent</i></p>	<p>COMMONWEALTH OF PENNSYLVANIA BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION</p> <p>Docket No. C-2025-3053949</p>
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REPLY TO NEW MATTER

AND NOW, comes Plaintiff Moravian Manors, Inc., doing business as Moravian Manor Communities (“MMC”), and hereby files this reply to the New Matter of nTherm, LLC (“nTherm”) as follows:

22. This paragraph is an incorporation clause to which no response is required.

23. Admitted.

24. Denied. MMC specifically denies that its billing clerk, Miranda Hubbs, identified herself as being authorized to change MMC’s gas or electric generation supplier.

25. MMC is without knowledge or information sufficient to form a belief as to whether its utility company mailed a letter informing MMC of a change in energy supplier. MMC further denies receiving notice of any energy supplier change through such communication.

26. Admitted.

27. Denied. MMC denies that it entered into a binding and enforceable energy supply contract with nTherm.

28. Admitted in part and denied in part. MMC admits only that the amounts nTherm attempted to charge are reflected on bills it issued to MMC. MMC denies that these charges were

authorized by any employee with actual authority to do so, or by anyone whom nTherm could have reasonably believed had such authority.

WHEREFORE, Complainant, Moravian Manors, Inc. requests that the Public Utility Commission enter judgment in its favor and against defendant nTherm, LLC pursuant to 66 Pa. C.S. A. § 3309(a) based on nTherm's violation of 52 Pa. Code §§ 57.171-179 and 52 Pa. Code §§ 59.91-59.99 in the total amount paid to nTherm after the unauthorized switch, plus interest, and award such further relief that the Commission deems just and appropriate.

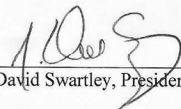
BARLEY SNYDER LLP

Date: April 23, 2025

By: /s/ Matthew M. Hennesy
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Attorney for Moravian Manors, Inc.

VERIFICATION

I, J. David Swartley, hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).



J. David Swartley, President/CEO

Date 4/22/2024