

**PUGLIESE, FINNEGAN, SHAFFER & FERENTINO LLC**  
ATTORNEYS AT LAW

Paul M. Pugliese  
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RIVERSIDE COMMONS  
575 PIERCE STREET - SUITE 500  
KINGSTON, PA 18704-5732

Of Counsel:  
Charles A. Shaffer

Phone: (570) 283-1800  
Fax: (570) 283-1840

October 17, 2025

**DATE OF DEPOSIT**

**OCT 17 2025**

PA Public Utility Commission  
Secretary's Bureau

VIA FEDEX

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

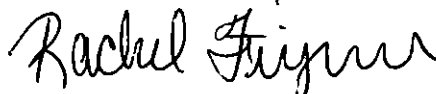
**Re: Eric Keiper v. Pennsylvania American Water Company**  
**Docket No. C-2025-3057455**

Dear Secretary Homsher:

Enclosed for filing on behalf of Eric Keiper is the Answer to Preliminary Objection of Pennsylvania American Water Company, Reply to New Matter and Request for Mediation. A copy of each has been served on the Respondent in accordance with the attached Certificate of Service.

Thank you for your time.

Regards,



RACHEL FINNEGAN

RAF/jr  
Enclosure

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Eric Keiper,  
Complainant

v.

Pennsylvania American Water Company,  
Respondent

Docket No. C-2025-3057455

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REQUEST FOR MEDIATION

AND NOW, comes the Complainant, ERIC KEIPER, by and through his Attorney, Rachel A. Finnegan, Esquire, and hereby submits that the Answer to Preliminary Objections of Pennsylvania American Water Company and the Reply to New Matter of Pennsylvania American Water Company has been filed. Complainant hereby formally requests that Mediation be scheduled in this matter.

Respectfully submitted,  
PUGLIESE, FINNEGAN, SHAFFER & FERENTINO LLC

BY: Rachel Finnegan  
RACHEL A. FINNEGAN, ESQUIRE  
ID. NO. 331195  
575 Pierce Street / Suite 500  
Kingston, PA 18704  
570-283-1800  
Counsel for Complainant

Date: October 17, 2025

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Eric Keiper,**  
**Complainant**

v.

**Pennsylvania American Water Company,**  
**Respondent**

**Docket No. C-2025-3057455**

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**ANSWER TO PRELIMINARY OBJECTION OF  
PENNSYLVANIA AMERICAN WATER COMPANY**

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AND NOW, comes the Complainant, ERIC KEIPER, by and through his Attorney, Rachel A. Finnegan, Esquire, and hereby submits the following Answers to the Respondent's Preliminary Objections pursuant to the regulations of the Pennsylvania Public Utility Commission at 52 Pa. Code § 5.101, and in support thereof, avers as follows:

**I. BACKGROUND**

1. Admitted upon information and belief.
2. Admitted upon information and belief.
3. Admitted.
4. Admitted.
5. Admitted in part. Complainant additionally requested that his August 2025 bill of \$9,187.52 be adjusted to his normal monthly average.
6. Denied. The averments of this paragraph are conclusions of law to which no response to pleading is required. To the extent a response is required the paragraph is denied.

**II. STANDARD OF REVIEW**

7. Denied. The averments of this paragraph are statements of law to which no response is required.

8. Denied. The averments of this paragraph are conclusions of law to which no response is required.
9. Denied. The averments of this paragraph are conclusions of law to which no response is required.

### III. PRELIMINARY OBJECTION

#### A. PRELIMINARY OBJECTION NO. 1 – THE COMPLAINT DOES NOT ALLEGE A VIOLATION OF THE PUBLIC UTILITY CODE, A COMMISSION REGULATION, A COMMISSION ORDER, OR THE COMPANY’S COMMISSION-APPROVED TARIFF AND, THEREFORE, IT IS LEGALLY INSUFFICIENT.

10. Incorporation paragraph to which no responsive pleading is required.
11. Denied. The averments of this paragraph are conclusions of law to which no response is required.
12. Denied. The averments of this paragraph are conclusions of law to which no response is required.
13. Denied. The averments of this paragraph are conclusions of law to which no response is required.
14. Admitted.
15. Admitted. The rule speaks for itself.
16. Admitted. The rule speaks for itself.
17. Denied. The averments of this paragraph are statements of law to which no response is required.
18. Denied. The averments of this paragraph are conclusions of law to which no response is required.
19. Denied.
20. Admitted in part. Denied in part. Complainant received the high-bill letters allegedly provided on May 7, 2025, June 4, 2025 and July 4, 2025. On August 1, 2025, Complainant made the initial discovery of a withdrawal of \$2,250.13 for the use of 117,000 gallons of water. Upon making this discovery, Complainant immediately notified the Respondent. Complainant received the first high-bill letter dated August 6, 2025 on August 15, 2025. The August 6, 2025 letter was sent five days after Complainants initial discovery and contact with the Respondent.

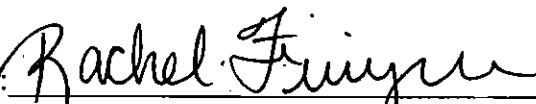
21. Denied. The averments of this paragraph are conclusions of law to which no response is required.

22. Denied. The averments of this paragraph are conclusions of law to which no response is required.

**WHEREFORE**, the Complainant prays this Honorable Court to dismiss the Respondents' Preliminary Objections.

Respectfully submitted,

PUGLIESE, FINNEGAN, SHAFFER & FERENTINO LLC

BY: 

RACHEL A. FINNEGAN, ESQUIRE

ID. NO. 331195

575 Pierce Street / Suite 500

Kingston, PA 18704

570-283-1800

Counsel for Complainant

Date: October 17, 2025

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Eric Keiper,**  
**Complainant**

v.

**Pennsylvania American Water Company,**  
**Respondent**

**Docket No. C-2025-3057455**

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PA Public Utility Commission  
Secretary's Bureau

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**REPLY TO NEW MATTER OF RESPONDENT,  
PENNSYLVANIA AMERICAN WATER COMPANY**

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AND NOW, comes the Complainant, ERIC KEIPER, by and through his Attorney, Rachel A. Finnegan, Esquire, and hereby submits the following Reply to New Matter of Respondent as follows:

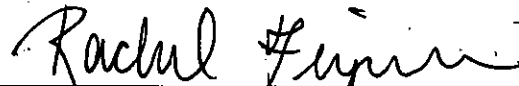
1. Incorporation paragraph to which no responsive pleading is required.
2. Denied. The averments of this paragraph are conclusions of law to which no response is required.
3. Admitted.
4. Admitted.
5. Admitted in part. Denied in part. Complainant received the high-bill letters allegedly provided on May 7, 2025, June 4, 2025 and July 4, 2025. On August 1, 2025, Complainant made the initial discovery of a withdrawal of \$2,250.13 for the use of 117,000 gallons of water. Upon making this discovery, Complainant immediately notified the Respondent. Complainant received the first high-bill letter dated August 6, 2025 on August 15, 2025. The August 6, 2025 letter was sent five days after Complainants initial discovery and contact with the Respondent.
6. Denied.

7. Denied. The averments of this paragraph are conclusions of law to which no response is required.
8. Admitted. The rule speaks for itself.
9. Denied. The averments of this paragraph are conclusions of law to which no response is required.
10. Denied. The averments of this paragraph are conclusions of law to which no response is required.

Respectfully submitted,

PUGLIESE, FINNEGAN, SHAFFER & FERENTINO LLC

BY:



RACHEL A. FINNEGAN, ESQUIRE

ID. NO. 331195.

575 Pierce Street / Suite 500

Kingston, PA 18704

570-283-1800

Counsel for Complainant

Date:

October 17, 2025

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Eric Keiper,  
Complainant

v.

Pennsylvania American Water Company,  
Respondent

Docket No. C-2025-3057455

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Secretary's Bureau

CERTIFICATE OF SERVICE

I, Rachel A. Finnegan, Esquire, of PUGLIESE, FINNEGAN, SHAFFER & FERENTINO LLC, Attorney for the Complainant, verify that I made service of the Answer to Preliminary Objections, Reply to New Matter and Request for Mediation upon the Respondent's counsel:

Nicholas A. Stobbe, Esquire  
17 North 2<sup>nd</sup> Street, 16<sup>th</sup> Floor  
Harrisburg, PA 17101

via first class mail on the 17<sup>th</sup> day of October, 2025.

PUGLIESE, FINNEGAN, SHAFFER & FERENTINO LLC

BY: Rachel Finnegan  
RACHEL A. FINNEGAN, ESQUIRE  
ID. NO. 331195  
575 Pierce Street / Suite 500  
Kingston, PA 18704  
570-283-1800  
Counsel for Complainant

Date: October 17, 2025

ORIGIN ID:HZLA (570) 283-1800  
RACHEL FINNEGAN, ESQUIRE  
PUGLIESE, FINNEGAN, SHAFFER & FEREN  
575 PIERCE STREET, SUITE 500  
KINGSTON, PA 18704  
UNITED STATES US

SHIP DATE: 17OCT25  
ACTWGT: 1.00 LB  
CAD: 103493786/INET4535

BILL SENDER

TO **MATTHEW L. HOMSHER, SECRETARY**  
**PA PUBLIC UTILITY COMMISSION**  
**400 NORTH STREET, SECOND FLOOR**  
**COMMONWEALTH KEYSTONE BUILDING**  
**HARRISBURG PA 17120**

58H-LA/008C/59F2

(800) 692-7380 REF: KEIPER, ERIC (JJF\_RAF)  
INV: DEPT:  
PO:

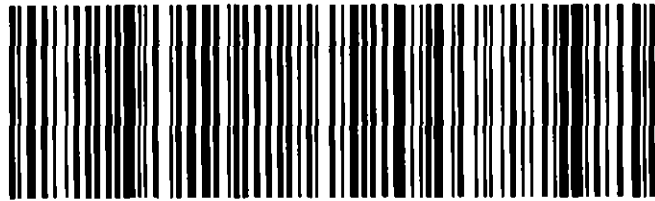


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0201

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17120  
PA-US MDT



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OCT 20 2025

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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