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November 30, 2025

**Via Electronic Filing**

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, PA 17120

**Re: Madrone Property Holdings, Inc. v. The Pittsburgh Water and Sewer Authority**  
Docket No.: C-2025-3058331

Dear Secretary Homsher:

Please accept for electronic filing the enclosed **Reply to New Matter** on behalf of Madrone Property Holdings, Inc. in the above-referenced proceeding.

A copy of this filing has been served upon Respondent's counsel in accordance with the Commission's Rules of Practice and Procedure.

Please contact me if you have any questions or require additional information.  
Thank you for your attention to this matter.

Respectfully submitted,



**Joette J. Scratow, Esq.**  
General Counsel  
Madrone Property Holdings, Inc.

Enclosure  
cc: Cert. of Service w/enc.

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing **Reply to New Matter** upon the party listed below in accordance with 52 Pa. Code § 1.54, by **Email**:

**Lauren M. Burge, Esq.**

Eckert Seamans Cherin & Mellott, LLC

600 Grant Street, 44th Floor

Pittsburgh, PA 15219

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Counsel for The Pittsburgh Water and Sewer Authority



**Joette J. Scratow, Esq.**

**Counsel for Madrone Property Holdings, Inc.**

Date: November 30, 2025

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Madrone Property Holdings, Inc. Complainant, v. The Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water,	: : : : : :	Docket No. C-2025-3058331
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**MADRONE PROPERTY HOLDINGS, INC.'S  
REPLY TO NEW MATTER TO THE FORMAL COMPLAINT**

**INTRODUCTION**

Madrone Property Holdings, Inc. (Complainant) through its general counsel, Joette Scoratow, hereby submits this reply to New Matter The Pittsburgh Water and Sewer Authority (Respondent) raised in response to the Formal Complaint filed by Madrone Property Holdings, Inc. in the above captioned matter.

**REPLY TO NEW MATTER**

1. Joette Scoratow is licensed to practice law in Pennsylvania (PA Attorney I.D. No.#28135) and licensed to practice law in California (CA Attorney I.D. No.#100212).
2. Ms. Scoratow serves as the general counsel for Madrone Property Holdings, Inc. and is authorized to appear as legal counsel for Madrone Property Holdings, Inc. in this proceeding.

**CONCLUSION**

WHEREFORE, Madrone Property Holdings, Inc. respectfully requests that the Commission:

- (a) deny Respondent's request to dismiss the Complaint; and,
- (b) grant the relief Madrone Property Holdings, Inc. requested in the Formal Complaint along with any other relief the Commission deems appropriate.

**Before and since filing the Formal Complaint, Madrone Property Holdings Inc. has repeatedly and unsuccessfully attempted to work with the Respondent to resolve this matter. Therefore**

**Madrone Property Holdings Inc. also respectfully requests that the Office of Administrative Law Judge issue an “Interim Order Setting Resolution Conference” directing the parties to hold a conference about resolving the case.**

**Respectfully submitted,**

**Madrone Property Holdings, Inc.**

**BY:** Joette J. Scratow

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Dated: November 30, 2025