

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Justin Cohen, Complainant  
v.  
Pennsylvania-American Water Company, Respondent

**Docket No. C-2026-3061336**

**REPLY TO NEW MATTER**

Complainant, Justin Cohen, hereby responds to the New Matter filed by Pennsylvania-American Water Company ("PAWC") as follows:

Complainant denies each and every allegation contained in Respondent's New Matter except where expressly admitted.

Complainant specifically denies that the charges at issue are accurate, properly calculated, or supported by sufficient verification. Respondent has failed to provide any certified meter testing, calibration records, or documented investigation results to substantiate the alleged usage. The assertion that high usage occurred on a "constant basis" is unsupported by independently verifiable data and does not align with historical consumption patterns.

Complainant further denies any implication that excessive usage was caused by leaks, internal plumbing defects, or customer-side conditions. Respondent has provided no evidence of such conditions and has not conducted or documented a reasonable investigation to support that conclusion.

Complainant also denies that Respondent has acted in good faith in reviewing or addressing the disputed charges. Despite multiple requests, Respondent has not produced sufficient documentation to validate billing accuracy.

With respect to Respondent's assertion that 19 Amity LLC must be represented by counsel, Complainant objects to any attempt to dismiss this matter on procedural grounds. Complainant initiated this action and is directly involved in and responsible for the account and dispute at issue. This proceeding involves factual billing disputes and consumer protection concerns, and Complainant is capable of responding to the allegations raised.

Complainant respectfully requests that the Pennsylvania Public Utility Commission require Respondent to produce all documentation supporting the disputed charges, including but not limited to meter testing results, calibration reports, usage logs, and internal investigation records, prior to any consideration of dismissal or adverse action.

Complainant further requests that no collection or termination actions be permitted while this dispute remains under review.

Respectfully submitted,

  
Justin Cohen  
Complainant