

Commission approve the proposed Tariff of Conneaut Lake Park Water Corporation, Inc.¹ Under Title 66 §1103(d), CLP also seeks the grant of a temporary Certificate of Public Convenience and the 2014 Trustees seek a temporary order of Abandonment pending resolution of the Joint Application.

In support thereof, the Joint Applicants aver as follows:

Introduction

This matter relates to the Conneaut Lake Park Water System ("Water System")² and its sale and operation by a new owner of the Water System. As will be more fully explained below, the United States Bankruptcy Court for the Western District of Pennsylvania approved the sale of the Water System and other assets associated with the Park from the 2014 Trustees for the Park, who hold the current Certificate of Public Convenience for the Water System, to Keldon Holdings LLC, who then transferred it to its wholly owned subsidiary, CLP. As part of the Bankruptcy proceeding, the Commission was given notice of the pending sale and the Final Decree, but failed to appear or make any comments regarding the sale or the Final Decree before the Bankruptcy Court. As a result, the sale was approved by the Bankruptcy Court, a Final Decree was entered, and the assets were transferred. Subsequent to the sale, the Commission notified the parties that they needed to file this Joint Application, which the Parties presently are doing. Given the circumstances that the sale has been consummated in accordance with the Bankruptcy Court's final

¹ Attached hereto as Exhibit A is the Application for Approval of Abandonment or Discontinuance of Service, In Whole or In Part and its accompanying exhibits submitted by the 2014 Trustees. Also attached hereto as Exhibit B is the Application for Certificate of Public Convenience and its accompanying exhibits submitted by Conneaut Lake Park.

² The Water System generally was a part of Conneaut Lake Park, which was a seasonal amusement park adjacent to Conneaut Lake that had operated since the late 1800s, more fully described below.

order, the Commission should issue a temporarily Certificate of Public Convenience to CLP and allow temporary abandonment by the 2014 Trustees pending the resolution of this Joint Application.

The Parties

1. The name and address of the Transferor, seeking to abandon the Water System is:

Trustees of Conneaut Lake Park, Inc.
c/o Economic Progress Alliance of Crawford County
789 Bessemer St.
Meadville, PA 16335
Attn: James J. Becker

2. The name and address of the Transferee and seeking to obtain the Certificate of Public Convenience is:

Conneaut Lake Park Water Corp., Inc.
713 Broad Acres Road
Narbeth, PA 19072
Attn: Todd Joseph
tjosephproperties@hotmail.com

3. The Trustees is a Pennsylvania non-profit corporation organized in 1997 and having a corporate purpose to preserve and maintain Conneaut Lake Park for historical, cultural, social and recreational and civic purposes for the benefit of the community and the general public. It is governed by a Board of Directors. In 2014, a new Board of Directors took over the Trustees (hereinafter referred to as the "2014 Trustees") and assumed control of the Park in that year from the prior Board of Director group that controlled the Trustees and the Park (hereinafter referred to as the "1997 Trustees").

4. The 2014 Trustees assumed control solely to operate Conneaut Lake Park, Inc. (**“Conneaut Lake Park”** or the **“Park”**) and deal with related significant financial and legal issues

caused by historical mismanagement.³ The goal of the 2014 Trustees was to attempt to preserve and save the Park, which had been placed into bankruptcy to stave off a forced sale. The 2014 Trustees had no outside source of revenue, and relied solely on the revenue generated by the Park to fund operations. The 2014 Trustees acted as the custodian of the assets of Conneaut Lake Park, Inc. and assisted in marshalling those assets through bankruptcy and related legal issues after the Park failed to maintain continued operations.

5. Conneaut Lake Park was a 120+ year old fully functional and operational community amusement park. Among the assets of the Trustees was the Water System that at the time of transfer provided water to a campground, a hotel, and the amusement park complex, in addition to certain residential properties. The Water System has been providing water service for over 95 years.

6. Keldon Holdings, LLC (“**Keldon**”) is a Pennsylvania limited liability company that acquired the Water System and other assets of the Park pursuant to a sale that was ordered by the Bankruptcy Court.

7. By Order of the Honorable Jeffrey A. Deller of the United States Bankruptcy Court of the Western District of Pennsylvania dated March 2, 2021, Keldon purchased all of the assets of the Trustees of Conneaut Lake Park, Inc., via an Asset Purchase Agreement approved by the Court consistent with its Order of that date. (Docket 14-11277-JAD; Order of Sale Attached hereto as Exhibit A-1 to the Abandonment Application). Among the assets acquired by Keldon was the

³ Prior to the 2014 Trustees assuming responsibility for the Park, the Park's owner was convicted in federal court of fraud and tax evasion; the 1997 Trustees were expelled by the Attorney General of Pennsylvania pursuant to a consent order due to breach of their fiduciary duties, and the Park was on the precipice of bankruptcy. Such was the state of things when the 2014 Trustees assumed control of the Park, its assets and operations.

Water System, including a water delivery system, water holding tank, conveyance system, purification system, rights to service customers, DEP Public Water Supply Operation Permit No. 2009505-MA-1 and four associated public water supply permits (2084504-T3-MA-1, 2009505, 2009505-MA-1, and 20084504-T-MA-2). Keldon purchased the assets of Conneaut Lake Park, Inc. free of all liens and claims.

8. Keldon subsequently transferred the assets of the Water System to CLP, an entity also acquired by Keldon as part of the assets of the sale. which had been previously formed solely to own, operate, and improve the Water System.

9. The attorney for the Joint Applicants is:

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Background

10. Originally, Conneaut Lake Park, in addition to using the Water system for its own purposes, also provided water service to residential users who leased residential dwellings owned by the Park that were located on Park property. In 1981, the Commission reviewed the lease agreements and determined Conneaut Lake Park was not subject to Commission jurisdiction.

11. However, since that time many leaseholders purchased the leased real estate from Conneaut Lake Park. After selling to the former lessees, Conneaut Lake Park continued to charge a flat annual rate for water service. Most recently, in 2017, the Trustees converted, as part of the Bankruptcy reorganization plan, a number of long term leases (either 99-year or 999-year leases)

to land ownership by deeding properties to the respective lessees. Not all of the leased properties were served by the Water System.

12. Financial issues have plagued the Park's operations since at least 1995, when the Park was placed into Bankruptcy. Mr. Gary Harris purchased the Park out of bankruptcy. At the time, Mr. Harris was under investigation for tax evasion. Knowing the investigation was ongoing, in 1997, the Trustee entity was formed to be governed by a Board of Directors. Mr. Harris then transferred the Park to the new Trustee entity to shield the Park from legal debts arising from his tax evasion prosecution.

13. From 1997 forward, for a period of over 20 years, the Park did not pay real estate taxes on its properties, resulting in massive delinquent tax bills. Then, in 1999, Mr. Harris was sentenced to serve four years in federal prison.

14. Also in 1999, due to several complaints, the Commission's Bureau of Consumer Services notified the 1997 Trustees by letter dated December 2, 1999 that it must obtain a Certificate of Public Convenience. The 1997 Trustees stopped charging the residential users and, instead, asked for voluntary contributions in order to operate and maintain the system. However, pursuant to the Commission's February 21, 2002 Order, the 1997 Trustees recommenced billing customers for water service.

15. By all accounts, the 1997 Trustees mismanaged the Park's assets. No property taxes were paid for over 20 years. In addition, between 1997 and 2014 the Park experienced two major fires, one consuming the dreamland ballroom and another rendering the beach club to ashes -- two of the Park's major attractions, and finally, several buildings on the midway began collapsing.

16. As a result of complaints regarding the mismanagement of the Park, the Pennsylvania Attorney General's Office began investigating the 1997 Trustees for mismanagement of the Park's assets and violations of their fiduciary duties.

17. Ultimately, in 2014, as part of a consent decree with the Attorney General's Office, the then-current Board of the 1997 Trustees was ousted and a new Board was named (becoming the 2014 Trustees), and at the same time, the Economic Progress Alliance of Crawford County was appointed as administrator of the Park by the 2014 Trustees.

18. Also in 2014, as a result of nearly 20-years of unpaid property taxes accruing under the 1997 Trustees, the Commissioners of Crawford County petitioned the Court of Common Pleas to proceed with sale of the Park's property at sheriff's sale as opposed to tax sale to allow the assets to be sold as one instead of pieced into separate parcels. The Attorney General's Office attempted to intervene to stop the sheriff's sale, but its objections were overruled by the Court.

19. Less than 20 hours before the scheduled sheriff's sale, with limited options available, the 2014 Trustees filed for bankruptcy protection to stay the sale. This began the process that ultimately resulted in the Trustees being forced to sell the Park's assets to Keldon seven years later when the COVID-19 pandemic drove the final nail in the Park's coffin.

20. Once the bankruptcy process was opened, the ghosts of the former owner and 1997 Trustees continued haunt the 2014 Trustees. Mr. Harris filed a frivolous claim alleging that he owned the Park's assets and sought payment of \$1.4 million. Additionally, the 2014 Trustees had to deal with litigation related to insurance proceeds from the fire that burned down the Beach Club as well as a lawsuit with the operator of Hotel Conneaut.

21. Meanwhile, the 2014 Trustees also had to work with the Bankruptcy Court and the creditors to sort through a reorganization plan that allowed the 2014 Trustees to continue to operate

the Park while providing a path to repayment of creditors, which included over \$1 million dollars in past due property taxes.

22. As part of the reorganization process, the 2014 Trustees sold off excess land that was not vital to the Park's operations.

23. In 2017, the Trustees used part of the insurance payment from the Beach Club fire, together with proceeds from the sale of excess land, to pay off over 17-years of accrued delinquent taxes.

24. Also in 2017, as part of the Bankruptcy reorganization plan, the Trustees began converting 170 long term leases to land ownership. Some, but not all, of the properties being converted were serviced by the Water System.

25. After the leases were converted, the 2014 Trustees continued operation of and improvements to the Park. The 2014 Trustees also began exploring improvements to the 90+ year old Water System.

26. However, all Park operations were forced to cease when the Governor issued a business closure order to combat the spread of COVID-19. Following the business closure order, the 2014 Trustees delayed and then cancelled the 2020 season for Conneaut Lake Park. Without revenue from Park operations, the 2014 Trustees were unable to make a series of required quarterly bankruptcy payments.

27. As a result of the missed payments, the Bankruptcy Court granted a motion to proceed with public auction of all of the Park's assets. Pursuant to the Court's procedures, the Commission and the Pennsylvania Department of Environmental Protection ("PADEP") were notified of the sale and bid procedures.

28. On December 17, 2020, in response to the ordered public auction, the Trustees entered into a Sales Agreement with Keldon for the sale of all of the Park's assets, including realty and personal property, and including the Water System, for a total amount of \$1.2 million. The Sales Agreement was subject to approval by the Bankruptcy Court.

29. January 26, 2021, the Notice of Bid Procedures, Auction Date and Sale Hearing for the Park was served on the Commission. See Exhibits C & D.

30. February 1, 2021, a Motion for Entry of an Order Approving the Sale of Substantially all the Debtor's Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests was served on the Commission. See Exhibits E & F.

31. On February 17, 2021, the deadline for responses and objections to the motion of sale passed. Prior to the deadline, PADEP voiced its concern regarding the water quality permit transfer and modifications were made to accommodate PADEP's concerns; however, the Commission remained silent.

32. On March 2, 2021, after a public hearing, the Bankruptcy Court approved the sale to Keldon by Order dated that same date. See Exhibit A-1.

33. On June 1, 2021, the 2014 Trustees filed a Motion for Final Decree, attached hereto as Exhibit G.

34. Also on June 1, 2021, Counsel for the 2014 Trustees filed a Certificate of Service for the Motion and setting forth a response deadline of June 18, 2021 and a hearing on June 25, 2021., attached hereto as Exhibit H. The Commission is identified as having been served with this Motion.

35. On June 21, 2021, having received no responses to the Motion filed by the 2014 Trustees, the Court entered an Order Granting Final Decree and closed the case. See Order attached hereto as Exhibit I.

36. No appeals were taken from the Bankruptcy Court's final order.

The System

37. As previously mentioned, the Water System consists of two wells, a 75,000 gallon elevated steel water tank, and a distribution system comprised of approximately 2.65 miles of cast iron and steel mains. A map of the coverage area and a depiction of the Water System is attached as Exhibits B-2 and B-3. In 2020, the average day and peak day usage was 31,315 gallons per day and 156,081 gallons per day, respectively. See Exhibits B-8 and B-9. The Water System is permitted through PaDEP water supply permit at a well supply rate of 300 gallons a minute, which equates to 721,440 gallons a day, and a treatment system flow rate of 200 gallons a minute, which is 288,000 gallons a day. See Exhibit B-6. Therefore, the Water System capacity is well above the average and peak flow demands of the Water System. Thus, the Water System has a significant amount of available capacity.

38. A certified operator, Christopher Greenburg, maintains the Water System. Attached as Exhibit B-6(ii) is his current license. Mr. Greenburg has been a certified operator for 13 yrs. He has operated the Water System for 5.5 years. His company, Keystone Water Systems LLC operates a total of a total of 33 public water systems and wastewater systems combined. The current agreement with the certified operator is attached as Exhibit J; and his prior Agreement with the 2014 Trustees is attached as Exhibit K.

39. Water service has been provided via the Water System for nearly 100 years to the amusement park, a campground, a hotel, as well as a number of seasonal and full-time residents.

40. Water service was provided, at times, free of charge and later at a flat rate. However, due to the loss of records in fires and likely inadequate record keeping of prior owners of the Water System, nearly all historical records of the Water System have been lost or destroyed.

41. Water service originally was provided to residential customers as leaseholders. The Commission reviewed this arrangement in 1981 and determined the Water System was not subject to PUC jurisdiction.

42. However, over time many of the leases were converted to ownership interests, including some long-term leases that were converted to deeds of ownership pursuant to the Bankruptcy reorganization plan in 2017. Some, but not all of the leases converted pursuant to the reorganization plan relate to properties serviced by the Water System.

43. Ultimately, due in large part to the leases being converted to ownership by the residential customers, the Commission determined the Water System was subject to Commission jurisdiction and ordered the 1997 Trustees to obtain a Certificate of Public Convenience. The 1997 Trustees obtained a Certificate of Public Convenience on September 18, 2003 at PUC Docket Number A-210096. See attached Exhibit L.

44. An initial tariff was filed for the Water System effective June 29, 2009 at PUC Docket Number A-210096. See attached Exhibit B-10. Under the initial tariff, the 1997 Trustees were permitted to charge users per quarter as follows: commercial customers-\$3,853.00; year-round residential customer-\$43.18; and seasonal residential customers-\$21.60. The tariff has not been changed since that time. The initial tariff proposed for CLP contains the same rates and terms as the existing tariff and is attached hereto as Exhibit B-11.

45. In 2021, at the time of transfer, the 2014 Trustees had been issuing bills for the use of the Water System to approximately 147 properties, the majority of which had been identified as seasonal residential customers. The 2014 Trustees inherited this list and did not verify its accuracy.

46. Following the Bankruptcy Court Order confirming the sale to Keldon. CLP also submitted a request to transfer the DEP Public Water Supply Permit, which was granted (see attached Exhibit B-6).

47. Following the sale, the 2014 Trustees entered into a Management Agreement with Keldon and CLP regarding the Water System. A copy of the Management Agreement is attached as Exhibit M. Under the Management Agreement, the 2014 Trustees retain responsibility to bill customers for service pursuant to its Certificate of Public Convenience, and CLP is responsible for all aspects of the physical operation of the Water System, including maintenance of the Water System. CLP also entered into a corresponding agreement with a Certificated Operator to manage the Water System. See Exhibit J. This was done pending submission and the Commission's approval of the Abandonment and the issuance of the Certificate of Public Convenience.

48. Since acquiring the Water System and entering into the Management Agreement, CLP has continued to operate and maintain the Water System using the same certified operator for the Water System as was used by the 2014 Trustees. The work has included ensuring that the Water System was operating properly, taking all water samples required under the DEP permit and making various repairs of the system, including leak repairs.

49. Since the acquisition, water quality has been good. The water is tested daily at the entry point and weekly throughout the distribution system. Samples are analyzed by a third party lab at multiple intervals throughout the year. No testing has indicated poor water quality. The

certified operator also utilizes a flushing program throughout the year to ensure that acceptable water quality is maintained throughout the distribution system at all times.

50. It is noted that there was an issue with timely reporting to the DEP in 2021 due to the lab vendor not providing the sample bottles in a timely fashion. That issue has been resolved and a new vendor has been selected.

51. In addition to maintaining water quality, system repairs have been maintained to ensure continued water service.

52. In March 2021, as a result of a tree falling onto a fire hydrant, the entire system had to be shut down on an emergency basis to conduct an emergency repair. The March 2021 incident consisted of a total of 8 leaks on the system. The water hammer created by this event caused 7 leaks on Comstock St. A section of Comstock St. was isolated for approximately 3 hours at 3 different times. The residents affected that CLP was able to make contact with were notified prior to the water being shut off.

53. Also, there were 5 other leaks in 2021 following the March 2021 incident. All of those leaks were timely repaired.

Reasons Supporting the Application

54. Section 1102(a)(3) of the Public Utility Code, 66 Pa.C.S. § 1102(a)(3), requires a public utility to obtain Commission approval, in the form of a certificate of public convenience, for the transfer of property used or useful in the public service.

55. Section 1103 of the Public Utility Code, 66 Pa.C.S. § 1103, provides that the Commission may grant a certificate of public convenience when it “find[s] or determine[s] that

the granting of such certificate is necessary or proper for the service, accommodation, convenience, or safety of the public.”

56. The Water System has been and continues to be operated by a Certified Operator, ensuring the safety, viability, and professional management of the Water System.

57. The sale of the Water System was required by Order of the Bankruptcy Court of the Western District of Pennsylvania. The Commission failed to challenge the sale before the Bankruptcy Court despite being served with the required notices, and failed to appeal the Bankruptcy Court's determination. As a result, the docket has been closed and the sale cannot be unwound.

58. Due to long-term deferred maintenance, the 90+ year old Water System has been and continues to be in need of repairs and upgrades.

59. Although the 2014 Trustees were in Bankruptcy due to long-term mismanagement of the Park by 1997 Trustees, the 2014 Trustees had put together a plan to upgrade the Water System. However, when the COVID-19 pandemic hit, the Park was forced to shut down, depriving the 2014 Trustees of needed revenue. Due to the closure of the Park depriving the 2014 Trustees of revenue, the 2014 Trustees missed required bankruptcy payments and the assets, including the Water System, were forced to be sold under the jurisdiction of the Bankruptcy Court.

60. Ultimately the work on the Water System could not be completed by the 2014 Trustees due to both operational and legal challenges, as detailed at length above.

61. Given the sale of the Park assets and the subsequent distribution of any funds received from the sale of those assets to the Park's creditors, the 2014 Trustees have no revenue or remaining assets and upon resolving this Joint Application the 2014 Trustees will be dissolved as a corporate entity. Further, to the extent the Commission wanted to prevent the 2014 Trustees

from being ordered to transfer the Water System, the time for doing so was during the Bankruptcy proceeding and the Commission failed to do so. Thus, the Commission must approve the 2014 Trustees transfer of the Water System and the 2014 Trustees Application for Abandonment as it no longer owns the Water System and such sale cannot be challenged or undone.

62. Further, the Commission must further approve the issuance of a Certificate of Public Convenience to CLP to ensure continuity of service to the public.

63. The Commission is to issue a Certificate of Public Convenience if it is in the public interest to do so. The following factors are evaluated to determine whether the issuance is in the Public Interest:

1. Public need
2. Technical capability
3. Financial capability
4. Experience, fitness, managerial organization, and financial resources
5. Customers' rates being increased or not
6. Increase or reduction in services to the public

When these factors are considered, it is clear that the issuance would be in the public interest.

64. First there is a public need. The Trustees sole purpose was to try to save the Park, and when that could not be done, they were forced by the Bankruptcy Court to sell the assets of the Park to pay off the Park's creditors. It had to sell the Water System. The buyer was the only legitimate option to whom to sell the Park. Absent the sale, the Water System would effectively have no operator as the Park did not have the revenue or assets to continue to operate the Water System. Accordingly, there is a public need to have CLP operate the Water System.

65. Next, CLP has demonstrated its technical capability to operate the system. In its first move, CLP hired the same Certified Operator used by the 2014 Trustees to operate the Water System. This Operator is well qualified, having operated the system for about 5 1/2 years. He has

the required certifications. His company is responsible for 33 water and wastewater systems. During his tenure with CLP, the certified operator has been diligent in properly operating the system.

66. In terms of water quality, water samples required under the Permit issued by PADEP to CLP have been taken continuously as required and the results have all shown that no violations exist. The Water System's water quality remains good.

67. In terms of system repairs, the certified operator and CLP have been diligent in making the repairs that were necessary to ensure the continued operation of the Water System and the continued provision of water service to the customers of the Water System.

68. Overall, since CLP has owned the Water System, absent emergency repairs, CLP and the Certified Operator have been able to ensure that the Water System provides continuous water service at adequate pressures to its customers and that the water quality has met all requirements of the Pennsylvania Department of Environmental Protection.

69. Next, the new Water System owner has the financial wherewithal to operate the system and the interest to do so. Following confirmation of the Bankruptcy Court proceedings, the existing-shell organization that is the 2014 Trustees possess neither. The Water Corp is a wholly owned subsidiary of Keldon. Keldon retains ownership to the remainder of the assets of the Park and intends to develop the Park into a profit making venture. It is in Keldon's best interests to have a Water System that can serve the development that Keldon seeks to achieve, especially given the available capacity of the Water System.

70. Next, the Water Corp has the experience, fitness, managerial organization, and financial resources to operate the system as has been demonstrated by the fact it has been operating

the system for approximately one year, utilizing and relying on the technical expertise and hands-on experience that the Certified Operator has in operating the Water System.

71. Next, with respect to customer rates, the rates ultimately will need to be increased. The current rates have been in place for nearly 20 years. The current rate structure, obviously, is not a sustainable model, and will need to be raised not only to cover operating costs, but also to cover the substantial capital costs that will be needed to be expended as the system continues to age. This will only result in a Water System that will continue to be reliable and safe into the future.

72. Lastly, there does not appear to be any impact on the services required to be provided to the public.

73. All of the above factors support the granting of this request to issue a Certificate of Public Convenience to CLP. Given the CLP's proven ability to maintain and operate the Water System in a manner consistent with the obligations under the tariff, the PUC laws and regulations and PADEP's laws and regulations; the complete inability of the 2014 Trustees to carry on with the operation of the Water System given it has no revenues or assets; and Keldon's interest in developing the Park, which will need to have a properly operating Water System to accomplish its goals, the Commission must approve CLP's. Application for a Certificate of Public Convenience.

74. Further, based on the above, the forced sale of the Water System to a capable third party to benefit the System and its users long-term and the Trustee's Abandonment Application must also be approved.

75. The Joint Applicants will supplement this Application with additional information that the Commission reasonably may require.

Conclusion

76. Joint Applicants believe the transfer of the Water System is in the public interest and in the best interest of the customers of the Water System. Approval of the Joint Petition is necessary or proper in order for the public served by the Water System to benefit by continuing to receive water services from a company with the resources and personnel to provide safe and reliable water services, at present and in the future. Joint Applicants submit that the acquisition is in the public interest and is necessary for the provision of safe and reliable water services because CLP can assure the short and long term reliability of the Water System, which the 2014 Trustees are not in a position to do.

WHEREFORE, Joint Applicants respectfully request that the Commission, pursuant to the provisions of the Public Utility Code, 66 Pa.C.S. §§ 1101-1103 and 2101, et seq., approve the Joint Application and issue an Order as follows:


a. The Commission recognize the Order of the Bankruptcy Court requiring the transfer of the Water System, and all rights and responsibilities related thereto, from the Trustees of Conneaut Lake Park, Inc. to Conneaut Lake Park Water Corporation, Inc.;

b. The Commission grant a Certificate of Public Convenience to the Conneaut Lake Park Water Corporation, Inc. allowing it to begin to offer, furnish, or supply water service to the public in portions of Summit and Sadsbury Townships, Crawford County, Pennsylvania;

c. The Commission grant the Application for Abandonment by the Trustees of Conneaut Lake Park, Inc. of all water service to the public, the cessation of all rights and obligations of the Trustees as a public utility, and the termination of all regulatory responsibility for operation of the Water System by the Trustees; and

d. The Commission approve the proposed Tariff of Conneaut Lake Park Water Corporation, Inc.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that I have on this date March 31, 2022, served a true copy of the foregoing document(s) upon the participants, listed below, in accordance with the requirements of §1.54 (relating to service by a participant).

Office of Consumer Advocate 555 Walnut Street 5 th Floor Forum Place Harrisburg, PA 17101-1923	Office of Small Business Advocate Commerce Building, Suite 1102 300 North Second Street Harrisburg, PA 17101
Bureau of Investigation and Enforcement Pa PUC PO Box 3265 Harrisburg, PA 17105	Dept of Environmental Protection NW Regional Office 230 Chestnut Street Meadville, PA 16335
Dept of Environmental Protection Rachel Carson State Office Building 400 Market Street Harrisburg, PA 17101	Sadsbury Township 9888 State Highway 285 Conneaut Lake, PA 16316
Summit Township Office P.O. Box 231 19056 Plum Street Harmonsburg, PA 16422	Aqua PA 665 S. Dock Street Sharon, PA 16146

Signature: _____



Name (printed): Mark J. Shaw _____

Title (printed): Attorney _____