

# Exhibit A

*This form is designed to assist the Water/Wastewater public utility with*  
**APPLICATION FOR APPROVAL OF ABANDONMENT OR  
DISCONTINUANCE OF SERVICE, IN WHOLE OR IN PART**

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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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If you plan to cease doing business within the Commonwealth of Pennsylvania, you are under a duty to request approval from the Commission prior to ceasing business. The attached form may be used to create your application to abandon your certificate of public convenience held for water or wastewater. Any exhibits should be placed at the end of the application. Abandonment applications are subject to a \$350 fee, payable to the "Commonwealth of Pennsylvania". If filing by hard copy, only one original of each document is required. Mail the filing and application fee to:

Secretary  
Pa Public Utility Commission  
P.O. Box 3265  
Harrisburg PA 17105

To eFile, click on the Filing & Resources link on the Commission's website at [www.puc.pa.gov](http://www.puc.pa.gov) for instructions.

Questions concerning the abandonment process may be directed to the Bureau of Technical Utility Service at 717-787-5550; please ask to be directed to the Water/Wastewater unit.

Checklist:

- Application and attachments, including your cover letter.
- A check for \$350 made payable to "Commonwealth of Pennsylvania".
- Original signed and notarized Verification Statement.
- Certificate of Service evidencing Application was served upon appropriate parties.

*Revised 9/30/15*

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**APPLICATION FOR APPROVAL OF ABANDONMENT OR  
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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

In Re: Application of Trustees of Conneaut Lake Park, Inc.  
(name of applicant) for approval of the  
abandonment or discontinuance of  
water service  
(describe service to be abandoned or  
discontinued).

Docket No: A-  
*(will be filled-in by the PUC's Secretary Office)*

1. Public utility code: PA PUC No. 1

2. Name of Company: Trustees of Conneaut Lake Park, Inc.

3. Company Address:

Street name & number: P.O. Box 978  
Post office box: \_\_\_\_\_  
City: Conneaut Lake  
State: PA  
Zip Code: 16316  
Main Telephone Number: 814-807-0502  
Email Address: jbecker@epacc.net  
Website Address: not applicable  
Fax number: 814-337-8282

4. Point of Contact for this Application:

Name: Mark J. Shaw  
Title: Attorney

*Complete the following if different than above:*

Street name & number: 100 State Street, Suite 700  
Post office box: \_\_\_\_\_  
City: Erie  
State: PA  
Zip code: 16507  
Telephone Number.: 814-870-7607  
Email address: mshaw@mijb.com  
Fax number: 814-454-4647

5. Attorney (if retained):

Name: Mark J. Shaw, Esq. - MacDonald, Illig, Jones & Britton LLP  
Street name & number: 100 State Street, Suite 700  
Post office box: \_\_\_\_\_  
City: Erie  
State: PA  
Zip code: 16507  
Telephone Number: 814-870-7607  
Email address: mshaw@mijb.com

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6. Provide a general description of the nature and character of the services rendered by the applicant:

Public water service in portions of Sadsbury and Summit Townships, Crawford County at Conneaut Lake Park

7. Provide a statement of change in service proposed by the applicant for which Commission approval is sought.

Applicant is applying for an abandonment of water service due to the forced sale of the water system to a new private owner, as required by Order of the Bankruptcy Court dated March 2, 2021, which is attached hereto as Exhibit 1. The Commission had notice of the proposed sale and the Court's hearing to approve the sale and failed to appear or object to the sale.

8. For partial abandonments/discontinuance, provide a map as an attached exhibit that depicts the existing service area as well as the service area to be abandoned.

Not applicable. All of the service area is to be abandoned.

9. Provide a written description for the boundaries of the area to be abandoned and quantify the abandonment area in acres.

See map attached as Exhibit 2. Acreage is unknown.

10. Provide a summary of the revenue derived from the operation of the service sought to be discontinued, together with a statement of the expenses accruing from the maintenance of that service. This information may be furnished in detail and attached to the application.

See revenue and expenditure report for 2020 attached hereto as Exhibit 3.

11. State the reasons why approval of the application is necessary.

All assets of the Trustees of Conneaut Lake Park, Inc., including the subject water system, have been sold pursuant to an Order of the Bankruptcy Court dated March 2, 2021, attached hereto as Exhibit 1.

12. Provide a detailed explanation of why the company wishes to abandon its certificated service territory.

The company wishes to abandon its certificated service territory due to its forced sale to a new private owner, by Order of the Bankruptcy Court dated March 2, 2021, attached hereto as Exhibit 1. See also Joint Application filed herewith.

13. Provide the number of customers served and date last served.

Last date served: March 8, 2021. The list, attached hereto as Exhibit 4, was inherited by the 2014 Trustees, and represents the addresses billed by the Trustees. The Trustees never confirmed the accuracy of this list as its efforts were focused on attempting to save the overall Park from bankruptcy and sale.

14. What will happen to these customers? Who will serve them?

Any customers will be served by the new owner.

15. Provide a copy of the agreement between the applicant and the proposed utility that will be accepting service responsibility for the applicant's customers.

Transfer of the water system was part of the sales agreement with the new owner, which was approved by Order of the Bankruptcy Court. See Agreement attached hereto as part of Exhibit 1 dated March 2, 2021.

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16. Provide a comparison of the utility service rates by class that a typical customer currently pays to the applicant and the rates a customer will pay the proposed utility.

Rates will remain unchanged.

17. As required by 52 Pa Code § 5.14(1), provide a copy of the publication notice from a newspaper(s) of general circulation serving the geographical territory affected by the application.

Notice will be published in the newspaper per Commission direction.

18. As required by 52 Pa Code § 5.14(2), provide a copy of the notice to the customers of the Applicant's plan to abandon service.

See attached Notice provided to the properties that received bills from the Trustees, attached hereto as Exhibit 5.

Application must be served on the statutory agencies and attested via a certificate of service.




**Instructions:** You must serve a copy of the Application and any amendments upon the Office of Consumer Advocate, Office of Small Business Advocate, and the Bureau of Investigation and Enforcement.

**Certificate of Service**

I hereby certify that I have on this date March 31, 2022 (month/day/year), 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).

Signature \_\_\_\_\_



Name (printed) Mark J. Shaw

Title (printed) Attorney

**Office of Consumer Advocate**

555 Walnut Street  
5<sup>th</sup> 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

**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).

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

Signature: \_\_\_\_\_



Name (printed): Mark J. Shaw \_\_\_\_\_

Title (printed): Attorney \_\_\_\_\_