

Prehearing Memorandum

A-2022-3031711

A-2022-3031712

Service List:

James S Tolbert Jr

21986 Russet Drive

Meadville PA 16335

814-337-2315

jtolbert@zoominternet.net

Potential Witnesses

Christopher R. Greenberg

Keystone Water Systems LLC

3285 S. Main St.

Sandy Lake, PA 16145

(724)376-7013

DJ Costa

DC Contracting

10958 W Townline Rd

Conneaut Lake PA 16316

814-382-2300

Mr Jack Moyers

12913 Rt 18

Conneaut Lake PA 16316

814-382-4651

Mr Robert Agnew

CLJMA

9888 St Hwy 285

Conneaut Lake PA 16316

84-382-1162

Issues:

Applicant doing business as CLP Water Corporation without proper permits/licensing

Applicant refusing to repair service lines on water company side of shutoff valve.

Applicant has contractor performing repairs that don't meet building code

Applicant using unlicensed personnel to operate water treatment plant

Applicant submitting unverified and falsified accounting documents in an effort to justify rate increase

Applicant attempting to obtain "free" water from one entity to another

Applicant denying new customer(s) access to water system.

I plan on introducing evidence that the contractors Mr Joseph hires are not certified water plant operators and have been shutting the water system entirely down to perform repairs, and have previously done work not up to building code standards. In addition, to introduce evidence on previous PUC rulings regarding "free" water to the Park, not to be subsidized by the homeowners. Also, plan on discussion around refusing to permit new customers/construction to hook up to existing water system.

