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September 22, 2023

**VIA ELECTRONIC SUBMISSION**

Ms. Rosemary Chiavetta  
Secretary of the Commission  
Commonwealth of Pennsylvania  
Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Re: Conneaut Lake Park Water Corporation  
Small Water Company Base Rate Filing  
Docket Number R-2023-3041575

Dear Secretary Chiavetta:

Attached please find Responses to TUS Data Request Set 1, Conneaut Lake Park Water Corporation, Inc. Tariff Supplement No. 1 to Tariff Water - Pa. P.U.C. No. 1 at Docket No. R-2023-3041575.

Very truly yours,

MacDONALD, ILLIG, JONES & BRITTON LLP

By  \_\_\_\_\_  
Mark J. Shaw

MJS/lmf/1826231.1  
Attachment

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, by the manner indicated below, and in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a party):

**SERVICE AS FOLLOWS:**

*Via Electronic Mail*

Patrick Cicero  
Christine Hoover  
Harrison W. Breitman  
Office of Consumer Advocate  
555 Walnut Street, 5th Floor  
Harrisburg, PA 17101-1923  
[PCicero@paoca.org](mailto:PCicero@paoca.org)  
[choover@paoca.org](mailto:choover@paoca.org)  
[hbreitman@paoca.org](mailto:hbreitman@paoca.org)

*Via Electronic Mail*

Sharon E. Webb  
Assistant Small Business Advocate  
Office of Small Business  
555 Walnut Street, 1st Floor  
Harrisburg, PA 17101  
[swebb@pa.gov](mailto:swebb@pa.gov)

*Via Electronic Mail*

Allison C. Kaster, Deputy Chief Prosecutor  
Michael A. Podskoch, Jr.  
Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120  
[akaster@pa.gov](mailto:akaster@pa.gov)  
[mpodskoch@pa.gov](mailto:mpodskoch@pa.gov)

*Via U.S. First Class Mail*

Brian R. Lang  
c/o Elaine and Frank Lang  
12124 Center Street West  
Conneaut Lake, PA 16316

*Via U.S. First Class Mail*

George Molloy  
213 Cobblestone Drive  
Pittsburgh, PA 15237

Respectfully submitted,



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Mark J. Shaw, Esq.  
MacDONALD, MLLIG, JONES & BRITTON LLP  
100 State Street, Suite 700  
Erie, Pennsylvania 16507-1459  
(814) 870-7607

Attorneys for:  
Conneaut Lake Park Water Corporation

TUS Data Request Set 1  
Conneaut Lake Park Water Corporation, Inc. Tariff Supplement No. 1 To Tariff Water -Pa.  
P.U.C. No. 1 at Docket No. R-2023-3041575

- R-1 Please provide separate and complete responses for each requirement of 52 Pa. Code § 53.52 for the historic test year ending December 31, 2022 (the HTY). Please note that failure to provide required responses may result in rejection of Tariff Supplement No. 1 To Tariff Water — Pa. P.U.C. No. 1 (Supplement No. 1) per 52 Pa. Code § 53.51(c).

**RESPONSE:**

It was the Company's understanding, that for a small water companies, the short form schedules would be sufficient for the filing. However, see below responses to the requirements of 52 PA Code 53.52.

- |                      |  |
|----------------------|--|
| 53.52(a)(1)          | See Supporting data and calculations in support of Tariff Supplement No. 1 to Tariff-Water PA PUC No. 1.                         |
| 53.52(a)(2)&(3)      | See Attachment 1 to TUS-1-1.   |
| 53.52(a)(4)-(8)      | See Supporting data and calculations in support of Tariff Supplement No. 1 to Tariff-Water PA PUC No. 1 and Notice to Customers. |
| 53.52(a)(9)-(10)     | No customer polls were taken. The Company plans on implementing monthly billing after the rates are approved in the filing.      |
| 53.52(a)(11)         | Not applicable.  |
| 53.52(b)(1)(2)(4)(6) | See Supporting data and calculations in support of Tariff Supplement No. 1 to Tariff-Water PA PUC No. 1.                         |
| 53.52(b)(3)(5)       | See Attachment 1 to TUS-1-1.   |
| 53.52(c)(1)(5)       | See Attachment 2 to TUS-1-1.   |
| 53.52(c)(2)(4)       | See Schedule B of Supporting data and calculations in support of Tariff Supplement No. 1 to Tariff-Water PA PUC No. 1.           |
| 53.52(c)(3)          | See Attachment 3 to TUS-1-1.   |
| 53.52(c)(6)          | Not applicable.  |
| 53.52(d)             | Not applicable.  |

Responsible Witness: Constance E. Heppenstall  
Date: September 22, 2023

TUS Data Request Set 1  
Conneaut Lake Park Water Corporation, Inc. Tariff Supplement No. 1 To Tariff Water -Pa.  
P.U.C. No. 1 at Docket No. R-2023-3041575

- R-2 Please provide separate and complete responses for each requirement of 52 Pa. Code §§ 53.52 and 53.56(b) for the future test year ending December 31, 2023 (the FTY), per 52 Pa. Code §§ 53.56(a)-(b). Please note that failure to provide required data may result in rejection of Supplement No. 1 per 52 Pa. Code § 53.51(c).

**RESPONSE:**

See response to TUS-1-1.

In addition, the Company's revenue to date is \$0.0 as the Company bills its customers at the end of the fiscal year. Expenses as of 6/30/2023 equal \$21,629.27 in Purchased Power and \$12,000 for Keystone Water Systems to manage the water system for a total of \$33,629.27, already more than what the Company expected to bill its customers at the end of the fiscal year.

Responsible Witness: Constance E. Heppenstall and Todd Joseph  
Date: September 22, 2023

## CONNEAUT LAKE PARK WATER COMPANY

### TOTAL NUMBER OF CUSTOMERS SERVED

Pursuant To Subsection 53.52 (a)(2) of Tariff Regulations

Customer Classification	As of 12/31/2022	As of 12/31/2023
(1)	(2)	(3)
Residential	162	162
Commercial	3	3
Total	165	165

### NUMBER OF CUSTOMERS WHOSE BILLS WILL INCREASE

Pursuant To Subsection 53.52 (a)(3) and (b)(3) of Tariff Regulations

Customer Classification	As of 12/31/2022	As of 12/31/2023
(1)	(2)	(3)
Residential	162	162
Commercial	3	3
Total	165	165

Name of Utility: **Conneaut Lake Park Water Corporation**

**Statements of Income**

	FTY				Totals after Increase (6-4+5)	
	Actual for the Year Ended 12/2022 Prior Year 2021 (1)	Test Year 2022 (2)	Annualization Adjustments (3)	Totals as Annualized (4=2+3)		Proposed Increase (5)
<b>Total Revenue: 1</b>	\$ 22,000	\$ 19,500	\$ 7,055	\$ 26,555	\$ 257,797	\$ 284,352
<b>Operating Expenses:</b>						
601.0 Operator	\$ 24,000	\$ 24,000		\$ 24,000		\$ 24,000
620.0 Operating Supplies				-		-
601.0 Maintenance Labor				-		-
620.0 Maintenance Supplies				-		-
610.0 Purchased Water				-		-
615.0 Purchased Power	21,500	23,000		23,000		23,000
635.0 Testing Expense				-		-
618.0 Chemicals				-		-
655.0 Insurance				-		-
601.0 General Office Salaries				-		-
675.0 General Office Expenses	3,500	3,500	\$ 4,780	8,280		8,280
675.0 Uncollectible Accounts			1,325	1,325	\$ 12,893	14,218
665.0 Rate Case Expense			20,000	20,000		20,000
403.0 Depreciation Expense	39,422	41,834	1,113	42,947		42,947
675.0 Other Misc. Expenses				-		-
<b>Taxes:</b>						
409.0 Federal Income Taxes		\$ -		-	\$ 29,033	\$ 29,033
409.0 State Income Taxes		-		-	13,656	13,656
408.0 All Other Taxes				-		-
<b>Total Expenses</b>	\$ 88,422	\$ 92,334	\$ 27,217	\$ 119,552	\$ 55,582	\$ 175,134
<b>Net Operating Income</b>	\$ (66,422)	\$ (72,834)	\$ (20,162)	\$ (92,997)	\$ 202,215	\$ 109,218
421.0 Non-Operating Income				-		-
<b>Non-Operating Deductions:</b>						
426.0 Other				-		-
427.0 Interest	\$ -			-		-
<b>Net Income</b>	\$ (66,422)	\$ (72,834)	\$ (20,162)	\$ (92,997)	\$ 202,215	\$ 109,218

1. Carried over from Statements of Revenues

Rate Base \$ 1,455,505  
ROR 7.504%

CONNEAUT LAKE WATER COMPANY  
UTILITY PLANT IN SERVICE BY NARUC ACCOUNT

Account	Account Description	12/31/2014 Plant in Service	12/31/2017 Additions	12/31/2018 Additions	12/31/2018 Retirements	12/31/2021 Additions	12/31/2022 Additions	Total
	<b>Source of Supply</b>							
304.2	Structures and Improvements	\$ 56,200						\$ 56,200
305.2	Collection and Impounding Reservoirs	51,164		18,250				69,414
307.2	Wells and Springs	77,121						77,121
309.2	Supply Mains	75,904						75,904
311.2	Pumping Equipment	1,164		1,673	(1,164)			1,673
	<b>Total Source of Supply</b>	<u>261,553</u>	<u>-</u>	<u>19,923</u>	<u>(1,164)</u>	<u>-</u>	<u>-</u>	<u>280,312</u>
	<b>Water Treatment Equipment</b>							
320.3	Water Treatment Equipment	1,200,000						1,200,000
	<b>Total Water Treatment Equipment</b>	<u>1,200,000</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>1,200,000</u>
	<b>Transmission and Distribution Plant</b>							
331.4	Transmission and Distribution Mains	-				104,000	89,000	193,000
333.4	Services	28,710	4,928.00	153				33,791
334.4	Meters and Meter Installations	160		8,333				8,493
335.4	Hydrants	1,700						1,700
336.4	Back Flow Prevention Devices			577				577
	<b>Total Transmission and Distribution Plant</b>	<u>30,570</u>	<u>4,928</u>	<u>9,063</u>	<u>-</u>	<u>104,000</u>	<u>89,000</u>	<u>237,561</u>
	<b>Total Utility Plant in Service</b>	\$ <u>1,492,123</u>	\$ <u>4,928</u>	\$ <u>28,986</u>	\$ <u>(1,164)</u>	\$ <u>104,000</u>	\$ <u>89,000</u>	\$ <u>1,717,873</u>

TUS Data Request Set 1

Conneaut Lake Park Water Corporation, Inc. Tariff Supplement No. 1 To Tariff Water -Pa.  
P.U.C. No. 1 at Docket No. R-2023-3041575

R-3 Conneaut's Short Form Schedules, Schedule C and the next page labelled "Bill Analysis" (Bill Analysis) do not appear to include HTY and FTY data for public fire protection customers (Public FPCs). However, Supplement No. 1, Page 4 identified a proposed Public FPC rate of \$100 per hydrant per year, compared to Conneaut's existing rate of \$10 per hydrant per year. Also, Trustees of Conneaut Lake Park, Inc.'s (Trustees) annual financial report for the year ending March 8, 2021, Page 19, Row 37 identified a utility plant in service (UPIS) value of \$1,700 for hydrants. Please provide a revised Schedule C and Bill Analysis to include HTY and FTY data for Public FPCs at present, adjusted present, and proposed rates.

**RESPONSE:**

The Company does not have any public fire protection customers.

Responsible Witness: Constance E. Heppenstall

Date: September 22, 2023



TUS Data Request Set 1  
Conneaut Lake Park Water Corporation, Inc. Tariff Supplement No. 1 To Tariff Water -Pa.  
P.U.C. No. 1 at Docket No. R-2023-3041575

- R-4 Please provide evidence verifying the proposed Public FPC rate of \$100 per hydrant per year complies with Section 1328(b)(1) of the Pennsylvania Public Utility Code, 66 Pa.C.S. § 1328(b)(1), which limits the rate charged to Public FPCs for public fire hydrants to 25% of the cost of service for those hydrants.

**RESPONSE:**

Since the Company has not performed a cost of service study in connection with the filing, the Company cannot verify that the Public FPC rate complies with Section 1329(b)(1) of the Code. However, the Company does not have any public fire protection customers.

Responsible Witness: Constance E. Heppenstall  
Date: September 22, 2023

TUS Data Request Set 1  
Conneaut Lake Park Water Corporation, Inc. Tariff Supplement No. 1 To Tariff Water -Pa.  
P.U.C. No. 1 at Docket No. R-2023-3041575

- R-5 Please quantify the number of fire hydrants served by Conneaut at the end of the HTY and the FTY, respectively, and specify where Conneaut identified the number of Public FPCs that it serves per 52 Pa. Code §§ 53.52(a)(2)-(3), (b)(3), and (b)(4).

**RESPONSE:**

The Company had ten private fire hydrants. The Company does not have any public hydrants.

Responsible Witness: Todd Joseph

Date: September 22, 2023

TUS Data Request Set 1

Conneaut Lake Park Water Corporation, Inc. Tariff Supplement No. 1 To Tariff Water -Pa.  
P.U.C. No. 1 at Docket No. R-2023-3041575

R-6 Conneaut's Short Folin Schedules, Schedule D identified HTY and FTY purchased power expenses of \$23,000. However, the Trustee's annual financial report for the 2020 calendar year identified a purchased power expense of \$3,692 for 2020 and \$8,232 for 2019. Please provide copies of all of Conneaut's electric bills for the HTY and the FTY to date.

**RESPONSE:**

Attached are twelve months of Conneaut's electric bills from August 2022 through September 2023, which are summarized below. The Company's electricity provider only supplies access to 12 months of past bills. The total for these bills equals \$38,550, much higher than the claimed power expense of \$23,000.

Month	George Street	Garage	Camperland	Total
Aug-23	\$ 1,811.70	\$ 130.29	\$ 2,216.91	\$ 4,158.90
Jul-23	\$ 1,025.97	\$ 299.00	\$ 2,534.84	\$ 3,859.81
Jun-23	\$ 517.23	\$ 171.22	\$ 1,871.57	\$ 2,560.02
May-23	\$ 482.98	\$ 2,710.22	\$ 1,098.58	\$ 4,291.78
Apr-23	\$ 2,556.22	\$ 2,491.23	\$ 365.09	\$ 5,412.54
Mar-23	\$ 2,050.36	\$ 2,069.37	\$ 243.35	\$ 4,363.08
Feb-23	\$ 1,414.56	\$ 1,485.04	\$ 239.08	\$ 3,138.68
Jan-23	\$ 755.60	\$ 870.80	\$ 236.77	\$ 1,863.17
Dec-22	\$ 1,204.04	\$ 703.75	\$ 189.45	\$ 2,097.24
Oct-22	\$ 545.71	\$ 78.80	\$ 762.04	\$ 1,386.55
Oct-22	\$ 533.01	\$ 98.97	\$ 1,377.92	\$ 2,009.90
Sep-22	\$ 973.26	\$ 302.00	\$ 2,133.38	\$ 3,408.64
	\$ 13,870.64	\$ 11,410.69	\$ 13,268.98	\$ 38,550.31

As the Company did not own the water system in 2020 and 2019, we cannot verify the purchased power expense in those years.

Responsible Witness: Todd Joseph

Date: September 22, 2023

# Billing & Payment History

\*6815, RT 618

100145306815

CLP CAMPERLAND LLC

RT 618

CONNEAUT LAKE PA 16316

- Billing History**

Below is a summary of your bill. If you want to view your entire bill statement online, you must enroll in our [eBill Program](#). Once enrolled, you will receive an email when your statement is available online for the next billing cycle. A "View Bill" link will be present in the last column to download a PDF of your bill; however, you will not be able to view previous bills online prior to your enrollment. For more information, review our [eBill Frequently Asked Questions](#).

[ENROLL IN EBILL](#)

Date	Billing period	Bill amount	View e
08/22/2023	07/19/2023 - 08/16/2023	\$2,216.91	N/A
07/21/2023	06/16/2023 - 07/18/2023	\$2,534.84	N/A
06/20/2023	05/18/2023 - 06/15/2023	\$1,871.57	N/A
05/22/2023	04/18/2023 - 05/17/2023	\$1,098.58	N/A
04/20/2023	03/20/2023 - 04/17/2023	\$365.09	N/A
03/22/2023	02/16/2023 - 03/19/2023	\$241.35	N/A
02/20/2023	01/18/2023 - 02/15/2023	\$239.08	N/A
01/20/2023	12/16/2022 - 01/17/2023	\$236.77	N/A
12/20/2022	11/17/2022 - 12/15/2022	\$189.45	N/A
11/21/2022	10/19/2022 - 11/16/2022	\$762.04	N/A
10/21/2022	09/20/2022 - 10/18/2022	\$1,377.92	<a href="#">View E</a>
09/22/2022	08/19/2022 - 09/19/2022	\$2,133.38	N/A

- Payment History**
- Itemized Statement**

We offer access up to the last twelve (12) months of your billing and payment information.

Date	Summary	Balance
○ 09/12/2023	Payment	\$0.00
○ 08/19/2023	Adjustment	\$2,216.91
○ 08/19/2023	Bill	\$2,227.41

**Date**

08/19/2023

**Amount Billed**

\$2,227.41

**KWH Usage**

15158

**Due Date**

09/06/2023

**Distribution Amount**

\$2,227.41

**Total Balance**

\$2,227.41

- 08/07/2023 Payment \$0.00
- 07/19/2023 Adjustment \$2,534.84
- 07/19/2023 Bill \$2,545.01

**Date**

07/19/2023

**Amount Billed**

\$2,545.01

**KWH Usage**

17534

**Due Date**

08/07/2023

**Distribution Amount**

\$2,545.01

**Total Balance**

\$2,545.01

- 06/30/2023 Payment \$0.00
- 06/17/2023 Adjustment \$1,871.57
- 06/17/2023 Bill \$1,881.09

**Date**

06/17/2023

**Amount Billed**

\$1,881.09

**KWH Usage**

13883

**Due Date**

07/05/2023

**Distribution Amount**

\$1,881.09

**Total Balance**

\$1,881.09

- **06/02/2023 Payment \$0.00**
- **05/18/2023 Adjustment \$1,098.58**
- **05/18/2023 Bill \$1,109.08**

**Date**

05/18/2023

**Amount Billed**

\$1,109.08

**KWH Usage**

8139

**Due Date**

06/06/2023

**Distribution Amount**

\$1,109.08

**Total Balance**

\$1,109.08

- **05/04/2023 Payment \$0.00**
- **04/18/2023 Adjustment \$365.09**
- **04/18/2023 Bill \$374.61**

**Date**

04/18/2023

**Amount Billed**

\$374.61

**KWH Usage**  
1227

**Due Date**  
05/05/2023

**Distribution Amount**  
\$374.61

**Total Balance**  
\$374.61

- **04/03/2023Payment\$0.00**
- **03/20/2023Adjustment\$241.35**
- **03/20/2023Bill\$251.19**

**Date**  
03/20/2023

**Amount Billed**  
\$251.19

**KWH Usage**  
20

**Due Date**  
04/06/2023

**Distribution Amount**  
\$251.19

**Total Balance**  
\$251.19

- **03/01/2023Payment\$0.00**
- **02/16/2023Adjustment\$239.08**
- **02/16/2023Bill\$249.25**

**Date**  
02/16/2023

**Amount Billed**  
\$249.25

**KWH Usage**  
2

**Due Date**

03/07/2023

**Distribution Amount**

\$249.25

**Total Balance**

\$249.25

- 02/09/2023 Payment \$0.00
- 01/18/2023 Adjustment \$236.77
- 01/18/2023 Bill \$246.94

**Date**

01/18/2023

**Amount Billed**

\$246.94

**KWH Usage**

3

**Due Date**

02/06/2023

**Distribution Amount**

\$246.94

**Total Balance**

\$246.94

- 01/09/2023 Payment \$0.00
- 12/17/2022 Adjustment \$189.45
- 12/17/2022 Bill \$198.97

**Date**

12/17/2022

**Amount Billed**

\$198.97

**KWH Usage**

3

**Due Date**

01/04/2023



**Distribution Amount**

\$198.97

**Total Balance**

\$198.97

- **11/29/2022Payment\$0.00**
- **11/17/2022Adjustment\$762.04**
- **11/17/2022Bill\$772.21**

**Date**

11/17/2022

**Amount Billed**

\$744.65

**KWH Usage**

4526

**Due Date**

12/06/2022

**Distribution Amount**

\$744.65

**Total Balance**

\$772.21

**Adjustment**

\$27.56

**Notes**

Late Payment Charge

- **11/16/2022Payment\$0.00**
- **10/19/2022Adjustment\$1,377.92**
- **10/19/2022Bill\$1,387.44**

**Date**

10/19/2022

**Amount Billed**

\$1,387.44

**KWH Usage**

9854

**Due Date**

11/07/2022

**Distribution Amount**

\$1,387.44

**Total Balance**

\$1,387.44

- 10/03/2022 Payment \$0.00
- 09/20/2022 Adjustment \$2,133.38
- 09/20/2022 Bill \$2,143.22

**Date**

09/20/2022

**Amount Billed**

\$2,143.22

**KWH Usage**

15207

**Due Date**

10/07/2022

**Distribution Amount**

\$2,143.22

**Total Balance**

\$2,143.22



**Messages (Continued)**

**Explanation of Terms**

**Customer Charge** - Monthly charge that offsets costs for billing, meter reading, equipment, service line maintenance, and assessing and deploying Smart Meter Technology.

**Default Service Support Charge** - Charge to recover new and deferred costs associated with serving customers in a competitive market.

**Distribution Charge** - Charge for the use of local wires, transformers, substations and other equipment used to deliver electricity to consumers from high-voltage transmission lines.

**Distribution System Improvement Charge** - This charge recovers costs incurred to repair, improve or replace infrastructure that the Company uses to deliver electricity to its customers.

**Estimated Reading** - On the months we do not read a meter, we calculate the bill based on past electrical usage.

**Energy Efficiency Charge(s)** - Charge to fund the utility's programs designed to reduce customers' annual electric use and peak demand for electricity mandated by Act 129 of 2008.

**Hourly Pricing Service Charge** - Charges to provide energy, capacity, compliance with Alternative Energy Portfolio Standards, transmission and ancillary services for industrial customers receiving Default Service.

**KWH (Kilowatt Hour)** - A unit of measure for electricity usage equal to 1,000 watts used for one hour.

**Late Payment Charge** - A charge added to the bill on balances owed after the Due Date.

**Price to Compare (PTC)** - Price per kilowatt hour to be used when comparing to the price of a generation supplier.

**Price to Compare Default Service** - Charges for costs to provide energy capacity, compliance with Alternative Energy Portfolio Standards, transmission and ancillary services for customers receiving Default Service.

**Prorated Reading** - Reading calculated by multiplying the daily average electric usage between two recent readings by the number of days in the billing period.

**Service Charge** - Charge for opening an account.

**Solar Requirements Charge** - Charge to acquire Solar Photovoltaic Alternative Energy Credits to comply with the Alternative Energy Portfolio Standards Act.

**State Tax Surcharge** - An adjustment to the state taxes recovered through Penelec's basic charges.

**TCJA Voluntary Surcharge** - This surcharge adjusts customer rates for the reduction to corporate federal income tax under the Tax Cuts and Jobs Act.

**General Information**

If you have billing questions or complaints about your Penelec account, please contact us before the due date.

**Call Customer Service** at 1-800-545-7741 Monday - Friday, from 8 a.m. - 6 p.m. Our representatives can answer your questions, describe the charges on your bill, explain how to make sure your bill is correct, and provide information on rate schedules and energy efficiency.

**Call Payment Options** at 1-800-962-4848 Monday - Friday, from 8 a.m. - 6 p.m.

**Visit our website** at [www.firstenergycorp.com](http://www.firstenergycorp.com)

**Write to us** at Penelec, 76 S. Main St., A-RPC, Akron, OH 44308-1890.

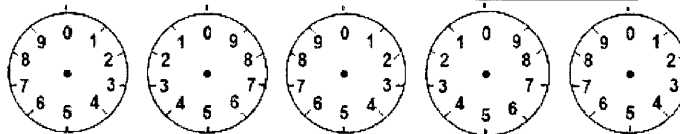
**Customers with hearing or speech impairments** can contact the Telecommunications Relay Service (TRS) at 711.

**For your protection**, all of our employees wear Photo I.D. badges.

**Electronic Check Conversion** - Your check authorizes us either to make a one-time electronic funds transfer (EFT) from your account or process as a check. If you have questions about this program, call 1-866-283-8081.

**To provide a customer meter reading**, use the dials provided and enter the reading on-line at [www.firstenergycorp.com/aboutyourbill](http://www.firstenergycorp.com/aboutyourbill) or by calling 1-800-545-7741. Say "Meter Reading" when asked "Which of these can I help you with today?" Have the date you took the reading available. If this is to avoid a scheduled estimate, please check the front of the bill for entry dates.

**Provide reading by telephone or on-line only: DO NOT MAIL**



Draw hands on the dials exactly as they appear on your electric meter. When reading your meter, if the hand falls between two numbers, always report the lower number.

If you have a **DIGITAL METER** write the numbers here



**Messages (Continued)**

**Explanation of Terms**

**Customer Charge** - Monthly charge that offsets costs for billing, meter reading, equipment, service line maintenance, and assessing and deploying Smart Meter Technology

**Default Service Support Charge** - Charge to recover new and deferred costs associated with serving customers in a competitive market

**Distribution Charge** - Charge for the use of local wires, transformers, substations and other equipment used to deliver electricity to consumers from high-voltage transmission lines

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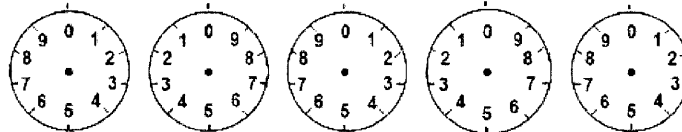
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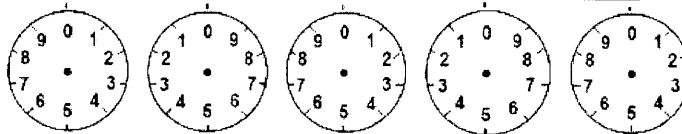
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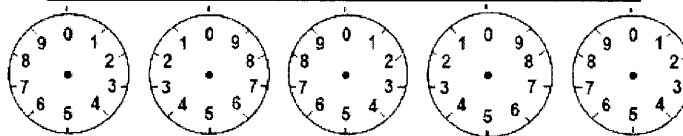
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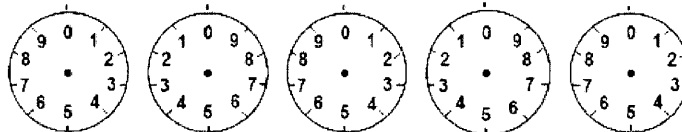
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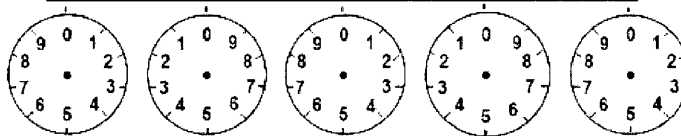
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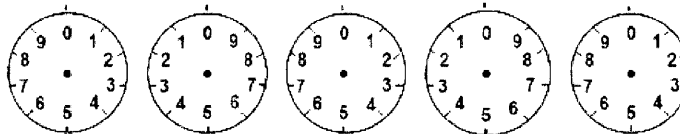
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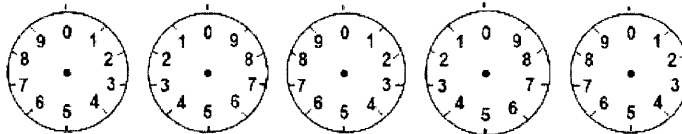
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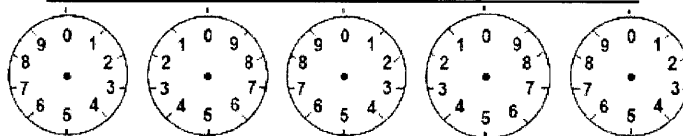
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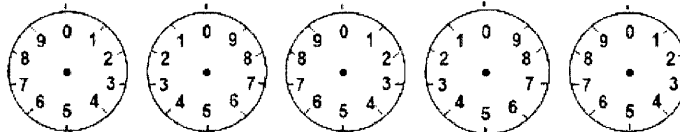
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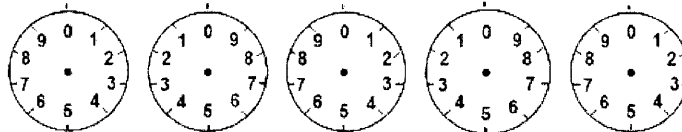
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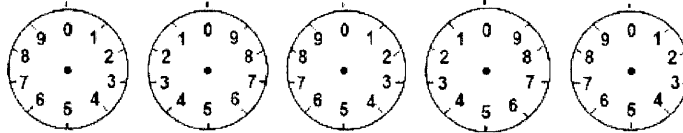
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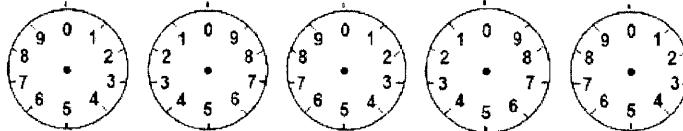
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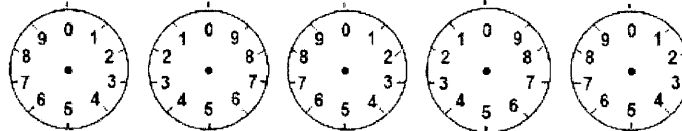
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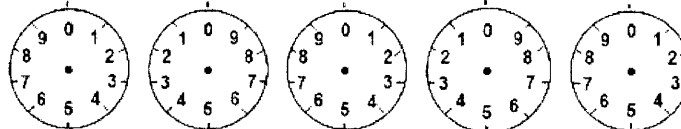
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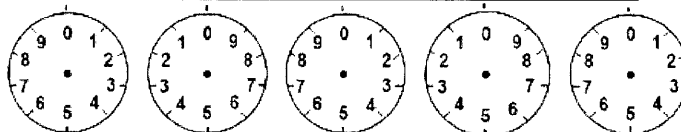
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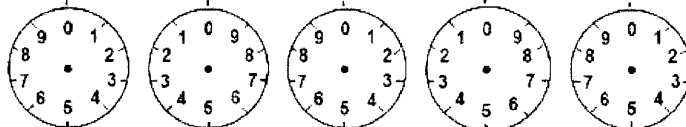
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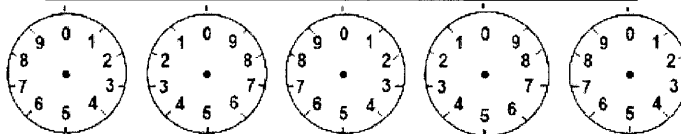
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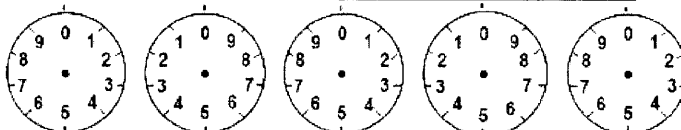
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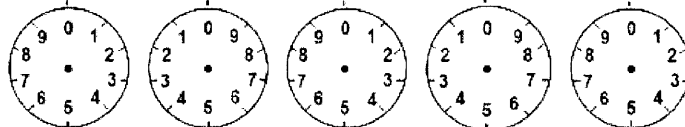
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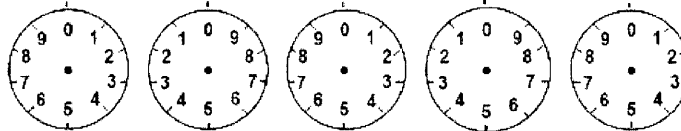
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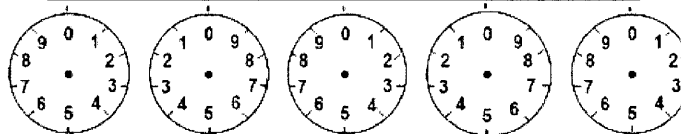
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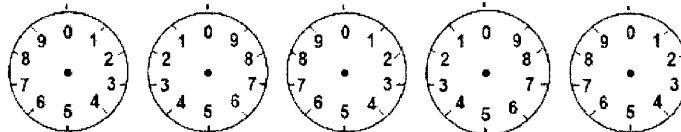
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If you have a **DIGITAL METER** write the numbers here:

TUS Data Request Set 1  
Conneaut Lake Park Water Corporation, Inc. Tariff Supplement No. 1 To Tariff Water -Pa.  
P.U.C. No. 1 at Docket No. R-2023-3041575

R-7 Please explain why Conneaut's purchased power expense claim is reasonable.

**RESPONSE:**

As the sum of the electric bills shown in response to TUS-1-6 are higher than the Company's current claim. Therefore, the purchased power expense claim is more than reasonable.

Responsible Witness: Constance E. Heppenstall

Date: September 22, 2023

TUS Data Request Set 1  
Conneaut Lake Park Water Corporation, Inc. Tariff Supplement No. 1 To Tariff Water -Pa.  
P.U.C. No. 1 at Docket No. R-2023-3041575

- R-8 Conneaut's Short Form Schedules, Schedule D identified depreciation expenses for 2021 and the HTY to be \$39,422 and \$41,834, respectively. Also, Conneaut's Statement of Reasons for Proposed Rate Increase (Statement of Reasons), Page 4 indicated that for the FTY, annual depreciation is based on applying an annual accrual rate of 2.5%. Considering the claimed depreciation expense and annual accrual rate, please provide responses for each of the following:
- a. Provide a detailed breakdown, by major plant account as defined by the National Association of Regulatory Utility Commissioners Uniform System of Accounts (NARUC System of Accounts), of Conneaut's UPIS that identifies the original cost of plant in service and date the assets were placed into service.
  - b. Explain how the 2.5% annual depreciation accrual rate was determined, including a description of the trending methodology used and an identification of all indexes used.
  - c. Explain how applying a single annual depreciation accrual rate to all UPIS accurately reflects the value of each plant account and is compliant to Section 1703 of the Pennsylvania Public Utility Code, 66 Pa.C.S. § 1703.

**RESPONSE:**

- a. The information available to the Company is supplied in TUS-1-1 Attachment 3.
- b. The Company is using the annual depreciation rate as used by the prior owner in its Annual Reports to the PA PUC.
- c. It would be optimal to for the Company to perform a depreciation study to determine an appropriate accrual rate by account, but the Company does not current have the funds to complete this study.

Responsible Witness: Constance E. Heppenstall  
Date: September 22, 2023

TUS Data Request Set 1  
Conneaut Lake Park Water Corporation, Inc. Tariff Supplement No. 1 To Tariff Water -Pa.  
P.U.C. No. 1 at Docket No. R-2023-3041575

R-9 Conneaut's Short Form Schedules, Schedule E contained a line item for plant additions installed 12-2014 in the amount of \$1,491,123 described only as "Various". Please provide a detailed breakdown, by major plant account as defined by the NARUC System of Accounts, for the assets included in this line item that describes the sizes, types, materials, and quantities of the assets placed in service.

**RESPONSE:**

See TUS-1-1 Attachment 3 which includes the information available to the Company.

Responsible Witness: Constance E. Heppenstall  
Date: September 22, 2023

TUS Data Request Set 1  
Conneaut Lake Park Water Corporation, Inc. Tariff Supplement No. 1 To Tariff Water -Pa.  
P.U.C. No. 1 at Docket No. R-2023-3041575

R-10 Conneaut's Short Form Schedules, Schedule E included line items for mains installed 12-2021 and 12-2022 in the amounts of \$104,000 and \$89,000, respectively. However, Short Form Schedule B identified the amount of UPIS at year ending March 8, 2021, to be \$1,482,109 and at the end of the HTY to be \$1,717,873; or an increase in UPIS of \$235,764. Please explain this discrepancy and provide revised Short Form Schedules as necessary.

**RESPONSE:**

The balance should have been \$1,524,873, to match the annual report filed as of 3/8/2021. See TUS-1-10 Attachment for the corrected schedule.

Responsible Witness: Constance E. Heppenstall  
Date: September 22, 2023

Name of Utility: Conneaut Lake Park Water Corporation

**BALANCE SHEETS**

<u>ASSETS</u>	<u>End of Prior Year</u> <u>03/08/2021</u>	<u>End of Test Year</u> <u>12/31/2022</u>
<u>UTILITY PLANT</u>		
101.0 Utility Plant in Service	\$ 1,524,873	\$ 1,717,873
105.0 Construction Work In Progress		
114.0 Utility Plant Acquisition Adjustment		
TOTAL UTILITY PLANT	\$ 1,524,873	\$ 1,717,873
108.1 Less: Accumulated Depreciation	\$ 219,421	\$ 262,368
NET UTILITY PLANT	\$ 1,305,452	\$ 1,455,505
<u>CURRENT ASSETS</u>		
131.1 Cash		
141.0 Accounts Receivable	\$ 1,295	
144.0 Notes Receivable		
151.0 Materials and Supplies		
162.0 Prepayments		
174.0 Other Current Assets		
TOTAL CURRENT ASSETS	\$ 1,295	\$ -
<u>OTHER ASSETS and DEFERRED CHARGES</u>		
186.0 Deferred Debt Expense		
186.0 Deferred Charges/Debits		
186.0 Other		
TOTAL OTHER ASSETS and DEFERRED CHARGES	\$ -	\$ -
<u>TOTAL ASSETS</u>	<u>\$ 1,306,747</u>	<u>\$ 1,455,505</u>

**Name of Utility: Conneaut Lake Park Water Corporation**

**BALANCE SHEETS**

<u>LIABILITIES &amp; EQUITY</u>	<u>End of Prior Year</u> <u>03/08/2021</u>	<u>End of Test Year</u> <u>12/31/2022</u>
<u>STOCKHOLDERS' EQUITY</u>		
201.0 Common Stock		
211.0 Capital in Excess of Par Value		
215.0 Retained Earnings		\$ 1,455,505
TOTAL STOCKHOLDERS' EQUITY	\$ -	\$ 1,455,505
<u>LONG-TERM DEBT</u>		
224.0 Long-term debt, excluding current portion	\$ -	\$ -
<u>CURRENT LIABILITIES</u>		
Current Portion of Long-term Debt		
231.0 Accounts Payable		
232.0 Notes Payable	\$ 1,547,485	\$ -
236.0 Accrued Taxes		
237.0 Accrued Interest		
241.0 Other Current Liabilities		
TOTAL CURRENT LIABILITIES	\$ 1,547,485	\$ -
<u>OTHER LIABILITIES and DEFERRED CREDITS</u>		
252.0 Advances for Construction		
253.0 Other Deferred Credits		
255.0 Deferred Investment Tax Credits		
271.0 Contributions in Aid of Construction		
282.0 Deferred Inc. Taxes - Lib. Depr.		
TOTAL OTHER LIABILITIES and DEFERRED CREDITS	\$ -	\$ -
<b><u>TOTAL LIABILITIES &amp; EQUITY</u></b>	<b>\$ 1,547,485</b>	<b>\$ 1,455,505</b>



TUS Data Request Set 1

Conneaut Lake Park Water Corporation, Inc. Tariff Supplement No. 1 To Tariff Water -Pa.  
P.U.C. No. 1 at Docket No. R-2023-3041575

- R-11 Conneaut's Short Form Schedules, Schedule E included line items for mains installed 12-2021 and 12-2022 in the amounts of \$104,000 and \$89,000, respectively. However, no corresponding retirements were reported. Please clarify if these line items represent additional main placed in service or main replacement projects. Also, if these line items represent main replacement projects, provide a revised Schedule E identifying any UPIS retirements due to main replacements.

**RESPONSE:**

These are main replacement projects. No retirements were recorded by the Company as there were no assets included rate base in Account 331.4,

Responsible Witness: Constance E. Heppenstall

Date: September 22, 2023

TUS Data Request Set 1  
Conneaut Lake Park Water Corporation, Inc. Tariff Supplement No. 1 To Tariff Water -Pa.  
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- R-12 Conneaut's Statement of Reasons, Page 4 indicated that provisions for materials and supplies and cash working capital were included in HTY and FTY original cost measures of value. Please separately quantify the amounts Conneaut added to the original cost for materials and supplies and cash working capital and provide supporting calculations or explanations indicating how amounts were determined (e.g., one-eighth method, lead/lag study, etc).

**RESPONSE:**

The Statement of Reasons is incorrect. No materials and supplies or cash working capital were included in the original cost measure of value.

Responsible Witness: Constance E. Heppenstall  
Date: September 22, 2023

TUS Data Request Set 1

Conneaut Lake Park Water Corporation, Inc. Tariff Supplement No. 1 To Tariff Water -Pa.  
P.U.C. No. 1 at Docket No. R-2023-3041575

- R-13 The 2022 federal and state income tax returns for an entity named CLP Water Park LLC included in Conneaut's filing specified a 2022 depreciation expense of \$10,333, and the state tax return identified a cost or other basis of \$403,000 for "water" property acquired July 1, 2021. Please provide evidence supporting the difference between the depreciation and property costs identified in these 2022 tax returns and Conneaut's depreciation and UPIS claims.

**RESPONSE:**

The depreciation expense and the cost or other basis included in the tax returns were based on the information obtained by the Company and given to their accountant at that time. The Company was not aware of the accounting included in the prior owner's past Annual Reports to the PA PUC. The depreciation amount, based on the cost or other basis of \$403,000, included in the tax return was based on IRS guidelines.

The rate base and depreciation expense in the filing is supported by past Annual Report filings to the PA PUC by the prior owner of the water system.

Responsible Witness: Constance E. Heppenstall and Todd Joseph

Date: September 22, 2023

TUS Data Request Set 1

Conneaut Lake Park Water Corporation, Inc. Tariff Supplement No. 1 To Tariff Water -Pa.  
P.U.C. No. 1 at Docket No. R-2023-3041575

R-14 The Trustees annual financial report for the 2009 calendar year included a letter that specified that in 2009, the water system was accepted for a federal grant and that Conneaut's costs to construct a new facility and add a backwash system totaled \$85,430.50. Also, this annual report, Page 15 identified UPIS of \$86,080. However, Conneaut's subsequent annual reports starting in the 2014 calendar year identified \$1,200,000 in UPIS for water treatment equipment. Please quantify any contributions-in-aid of construction that may have been used to fund UPIS construction.

**RESPONSE:**

The Company is not aware of any CIAC. In fact, in the 2013 Annual Report to the PA PUC, no assets were listed as Utility Plant in Service, nor were there any notes payable. However, the 2014 Annual Report to the PA PUC, the prior owners of the utility listed for the first time UPIS in the amount of \$1,492,123 and notes payable of the amount of \$1,485,616. The Company can only assume that the notes payable were to fund the UPIS.

Responsible Witness: Constance E. Heppenstall

Date: September 22, 2023

TUS Data Request Set 1  
Conneaut Lake Park Water Corporation, Inc. Tariff Supplement No. 1 To Tariff Water -Pa.  
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- R-15 The Trustees annual financial report for the 2014 calendar year, Page 15 included a footnote indicating, "Utility Plant Benchmark Asset Valuation completed for 12-312014 Continuing Property Records". Please provide a copy of this document and any other original cost studies completed to determine UPIS original cost.

**RESPONSE:**

The Company does not have the "Utility Plant Benchmark Asset Valuation completed for 12-312014 Continuing Property Records" this was commissioned prior to the current ownership.

Responsible Witness: Todd Joseph  
Date: September 22, 2023

TUS Data Request Set 1

Conneaut Lake Park Water Corporation, Inc. Tariff Supplement No. 1 To Tariff Water -Pa.  
P.U.C. No. 1 at Docket No. R-2023-3041575

- R-16 Supplement No. 1, Page 4 identified several commercial monthly rates, including a commercial flat rate of \$850, a "Small Commercial" minimum charge rate of \$850 plus \$10 per 100 gallons over "Minimum", and a "Large Commercial" minimum charge rate of \$2,183.40 plus \$10 per 100 gallons over "Minimum" (together, the Commercial Minimum Charges). Also, 52 Pa. Code § 53.25 requires public utilities to provide definitions of technical terms used in tariffs, and 52 Pa. Code § 53.26(a) requires each rate schedule to set forth explicitly the conditions under which a service covered by rates is available. Finally, it appears that the Bill Analysis specified that there will be no commercial flat rate customers and appears to identify volumes of water included in Commercial Minimum Charges that are not identified in Supplement No. 1. Please provide a copy of a revised Supplement No. 1 that includes the following information:
- a. Provide definitions for the terms "Small Commercial" and "Large Commercial" setting forth explicitly the conditions under which a Customer would be considered a "Small Commercial" or "Large Commercial" Customer (e.g., meter size, etc.).
  - b. Specify the volume of water that is included in each Commercial Minimum Charge and for each billing period option (i.e., monthly and quarterly volumes).
  - c. Either specify the conditions under which nonresidential service may be billed at flat rates rather than Commercial Minimum Charges or eliminate commercial flat rates from Supplement No. 1.

**RESPONSE:**

- a. A Small Commercial customer would include customers whose average monthly usage is under 15,000 gallons per month and a Large Commercial Customer would include customers whose average monthly usage is over 15,000 gallons per month.
- b. For a Small Commercial customer, 8,500 gallons is included in the monthly minimum charge. For a Large Commercial customer, 21,834 gallons are included in the monthly minimum charge.
- c. A nonresidential customer may be billed at a flat rate if the customer is not metered.

Responsible Witness: Constance E. Heppenstall  
Date: September 22, 2023

TUS Data Request Set 1  
Conneaut Lake Park Water Corporation, Inc. Tariff Supplement No. 1 To Tariff Water -Pa.  
P.U.C. No. 1 at Docket No. R-2023-3041575

R-17 Please explain how Conneaut determined Commercial Minimum Charges and provide copies of any supporting documentation.

**RESPONSE:**

The Company increased the minimum charge from the flat rate charge by 850%, the same percentage increase applied to the Year-Around Residential customer. A minimum was applied as these customers are metered. But, as these meters have never been read by the Company and usage cannot be predicted, it was determined to set the minimum at 850% of the flat rate to protect the Company from under collecting revenue once the meters are read on a monthly basis.

Responsible Witness: Constance E. Heppenstall  
Date: September 22, 2023

TUS Data Request Set 1  
Conneaut Lake Park Water Corporation, Inc. Tariff Supplement No. 1 To Tariff Water -Pa.  
P.U.C. No. 1 at Docket No. R-2023-3041575

R-18 Please explain why Conneaut's Commercial Minimum Charges are just, reasonable, and not unreasonably discriminatory.

**RESPONSE:**

The Company raised rates across the board by class and, thus believes that the rates are not discriminatory. See response to TUS-1-17.

Responsible Witness: Constance E. Heppenstall  
Date: September 22, 2023



TUS Data Request Set 1  
Conneaut Lake Park Water Corporation, Inc. Tariff Supplement No. 1 To Tariff Water -Pa.  
P.U.C. No. 1 at Docket No. R-2023-3041575

R-19 Please provide water meter readings and meter reading dates for each commercial customer served by Conneaut for the last two years.

**RESPONSE:**

As stated in response to TUS-1-17, the Company has not read the meters for the commercial customers as it would not affect their billing under a flat rate.

Responsible Witness: Constance E. Heppenstall

Date: September 22, 2023

TUS Data Request Set 1  
Conneaut Lake Park Water Corporation, Inc. Tariff Supplement No. 1 To Tariff Water -Pa.  
P.U.C. No. 1 at Docket No. R-2023-3041575

R-20 The 2022 federal and state income tax returns for an entity named CLP Water Park LLC included in Conneaut's filing appear to be tax returns for an entity named CLP Water Park LLC. Also, Conneaut's Short Form Schedules, Schedule A, Section II.A. identified an ownership type of "LLC". However, it does not appear that Conneaut is organized as a LLC. Please reconfirm that Conneaut is the water system's owner and operator and provide copies of Conneaut's two most recent federal and state tax returns.

**RESPONSE:**

The water system was purchased a part of a larger acquisition of Conneaut Lake Park through a bankruptcy. Conneaut Lake Park Water Corporation, Inc. ("Water Corp., Inc.") was part of the assets acquired. It had been formed by the prior owners to serve as the corporate vehicle for the water system. Subsequently, upon acquisition, the PADEP permit was transferred directly from the prior owners to Water Corp., Inc. The new owner simultaneously formed the LLC with the intent of using that as the corporate vehicle for the water system. The Certificate of Public Convenience also was issued in the name of Water Corp., Inc. due to the entity being used for the DEP permit. Since its inception, the LLC, via funds provided by Mr. Joseph, has funded the monies needed to keep the water system operational. Consequently, the two returns you have relate to the operation of the water system, but are in the name of the LLC.

Responsible Witness: Todd Joseph  
Date: September 22, 2023

TUS Data Request Set 1  
Conneaut Lake Park Water Corporation, Inc. Tariff Supplement No. 1 To Tariff Water -Pa.  
P.U.C. No. 1 at Docket No. R-2023-3041575

- R-21 Please provide evidence that Conneaut filed its Security Planning and Readiness Self-Certification Form with the Commission for the 2021 and 2022 calendar years pursuant to 52 Pa. Code § 101.4(a).

**RESPONSE:**

As the Company did not receive PUC approval of the Certificate of Public Convenience until April 20, 2023, it did not prepare a Security Planning and Readiness Self-Certification Form with the Commission for the 2021 and 2022 calendar years pursuant to 52 Pa. Code § 101.4(a).

Responsible Witness: Todd Joseph  
Date: September 22, 2023

TUS Data Request Set 1  
Conneaut Lake Park Water Corporation, Inc. Tariff Supplement No. 1 To Tariff Water -Pa.  
P.U.C. No. 1 at Docket No. R-2023-3041575

R-22 Please provide evidence that Conneaut filed its annual financial report with the Commission for the 2021 and 2022 calendar years pursuant to 52 Pa. Code § 65.19(1).

**RESPONSE:**

As the Company did not receive PUC approval of the Certificate of Public Convenience until April 20, 2023, it did not prepare annual financial report with the Commission for the 2021 and 2022 calendar years pursuant to 52 Pa. Code § 65.19(1).

Responsible Witness: Todd Joseph  
Date: September 22, 2023

TUS Data Request Set 1  
Conneaut Lake Park Water Corporation, Inc. Tariff Supplement No. 1 To Tariff Water -Pa.  
P.U.C. No. 1 at Docket No. R-2023-3041575

R-23 Please quantify the number of disputes initiated by Conneaut customers since Conneaut's inception that required compliance with dispute procedures under 52 Pa. Code § 56.151.

**RESPONSE:**

Conneaut received PUC approval of its request for a Certificate of public Convenience on April 20, 2023. Since that time, there has been no dispute initiated by Conneaut customers since Conneaut's inception that required compliance with dispute procedures under 52 Pa. Code § 56.151. Prior to the receipt of the Certificate of Public Convenience, however, a customer did file a formal complaint relating to rates on April 10, 2023, but that matter was withdrawn by the customer.

Responsible Witness: Todd Joseph  
Date: September 22, 2023

TUS Data Request Set 1  
Conneaut Lake Park Water Corporation, Inc. Tariff Supplement No. 1 To Tariff Water -Pa.  
P.U.C. No. 1 at Docket No. R-2023-3041575

R-24 Please provide a copy of every Conneaut written public utility company report per 52 Pa. Code §§ 56.151(5)(i) and (ii).

**RESPONSE:**

None.

Responsible Witness: Todd Joseph  
Date: September 22, 2023

TUS Data Request Set 1

Conneaut Lake Park Water Corporation, Inc. Tariff Supplement No. 1 To Tariff Water -Pa.  
P.U.C. No. 1 at Docket No. R-2023-3041575

R-25 The Commission's Order entered September 18, 2003, at Docket A-210096, Appendix A identified several commercial customers served by the Trustees, including businesses known as Camperland, Hotel Conneaut, the Beach Club, the Convention Hall, and the Water Park. Also, the Trustees annual financial report for the 2020 calendar year included a copy of a Primary Facility Report that identified 185 domestic connections and 15 commercial connections. However, Conneaut's Bill Analysis only identified three commercial customers. For each Conneaut nonresidential customer, please specify the customer's name, provide an estimate of their monthly water usage and identify their applicable flat or minimum rate.

**RESPONSE:**

The Company's current three commercial customers include the Hotel Conneaut, Camperland and a Dollar General. The Beach Club, Convention Hall and the Water Park are no longer operational.

The customers monthly usage is not available as Company has not read the meters for these customers.

Camperland and the Dollar General will pay a minimum of \$850.00 per month and the Hotel Conneaut will pay a minimum of \$2,183.40 per month.

Responsible Witness: Constance E. Heppenstall and Todd Joseph  
Date: September 22, 2023

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

CONNEAUT LAKE PARK WATER  
CORPORATION, INC.

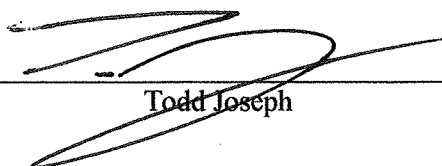
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DOCKET NO. R-2023-3041575

**VERIFICATION**

I, Todd Joseph, hereby state that the averments set forth in the foregoing Responses Nos. 2, 5, 6, 13, 15, 20, 21, 22, 23, 24, and 25 to TUS Data Request Set 1, Conneaut Lake Park Water Corporation, Inc., Tariff Supplement No. 1 To Tariff Water - Pa. P.U.C. No. 1 at Docket No. R-2023-3041575, are true and correct to the best of my knowledge, information, and belief. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Dated: 9-21-23

  
\_\_\_\_\_  
Todd Joseph



BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

CONNEAUT LAKE PARK WATER  
CORPORATION, INC.

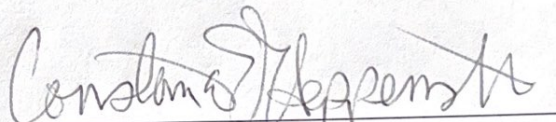
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VERIFICATION

I, Constance E. Heppenstall, hereby state that the averments set forth in the foregoing Responses Nos. 1, 2, 3, 4, 7, 8, 9, 10, 11, 12, 13, 14, 16, 17, 18, 19, and 25 to TUS Data Request Set 1, Conneaut Lake Park Water Corporation, Inc., Tariff Supplement No. 1 To Tariff Water - Pa. P.U.C. No. 1 at Docket No. R-2023-3041575, are true and correct to the best of my knowledge, information, and belief. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Dated:

9/21/2023

  
Constance E. Heppenstall