

MARK J. SHAW, ESQ.  
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October 10, 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

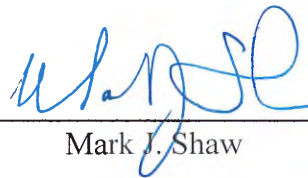
Dear Secretary Chiavetta:

Attached please find Responses to Bureau of Investigation and Enforcement's (I&E) Data Requests Set RE (Nos. 1-D through 15-D) - Walker at Docket No. R-2023-3041575.

Very truly yours,

MacDONALD, ILLIG, JONES & BRITTON LLP

By \_\_\_\_\_



Mark J. Shaw

MJS/exm/1828142.1  
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 blow, 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 Electronic Mail*

Joshua D. Brown, Esq.  
Dillon McCandless King Coulter & Graham LLP  
128 West Cunningham Street  
Butler, PA 16001  
[jbrown@dmkcg.com](mailto:jbrown@dmkcg.com)

Respectfully submitted,



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Mark J. Shaw, Esq.  
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Erie, Pennsylvania 16507-1459  
(814) 870-7607

Attorneys for:  
Conneaut Lake Park Water Corporation

**BUREAU OF INVESTIGATION AND ENFORCEMENT DATA REQUESTS**

**CONNEAUT LAKE PARK WATER CORPORATION, INC.**

**Docket No. R-2023-3041575**

**Analyst: Zac Walker**

**I&E-RE-1-D**

Reference Conneaut Lake Park Water Corporation, Inc. filing, Schedule D, Statements of Income, concerning Uncollectible Accounts:

- A. Provide Conneaut Lake Park Water Corporation, Inc.'s annual gross revenues and net write-offs for each of the past five years (2018 through the historic test year ended December 31, 2022 (HTY)).
- B. Provide Conneaut Lake Park Water Corporation, Inc.'s current year-to-date gross revenues and net write-offs balance.
- C. Explain Conneaut Lake Park Water Corporation, Inc.'s accounting procedures for determining the amount of bad debt expense recorded.
- D. Provide supporting documentation including detailed calculations for the Total Annualized uncollectible accounts claim at present rates of \$1,325.
- E. Provide supporting documentation including detailed calculations for the Proposed Rate uncollectible accounts claim of \$14,218.

**RESPONSE:**

- A. The amount as of December 31, 2022 was equal to zero as the Company only received approval from the PA PUC in March of 2023.
- B. Customers are not billed until year end, therefore \$0 of revenues have been booked year-to-date, and \$0 of uncollectibles.
- C. Witness Heppenstall calculated the bad debt expense by determining the percent of uncollectible revenues to total annual booked revenues. See parts D and E for further explanation.

**BUREAU OF INVESTIGATION AND ENFORCEMENT DATA REQUESTS**

**CONNEAUT LAKE PARK WATER CORPORATION, INC.**

**Docket No. R-2023-3041575**

**Analyst: Zac Walker**

- D. See 'I&E-RE-1-D Attachment' for the detailed calculation of uncollectible account claims at present rates of \$1,325.
  
- E. The total uncollectible account claims at present rates totaled about 5% of \$26,046 in total revenues from water sales for the HTY. The revenues under proposed rates for the FTY totals \$284,352. Therefore, the proposed rate uncollectible accounts claims are 5% of the revenues under proposed rates, which equals \$14,218.

Responsible Witness: T. Joseph/C. Heppenstall

Date: 10-10-23

<b>YEARLY BILLING</b>			
<b>AMOUNT 2022</b>	<b>SERVICE ADDRESS</b>	<b>PAID</b>	<b>Unpaid</b>
\$ 43.18	12689 Comstock St Street	X	
\$ 86.40	10851 Brown Street		\$ 86.40
\$ 86.40	10860 Brown Ave	X	
\$ 86.40	12495 Reed	X	
\$ 86.40	10933 Henry Street		\$ 86.40
\$ 86.40	10936 Henry Street	X	
\$ 86.40	10997 Henry	X	
\$ 86.40	11019 Henry	X	
\$ 86.40	11036 Henry Street	X	
\$ 86.40	11041 Henry Street	X	
\$ 86.40	11043 Henry Street	X	
\$ 86.40	12234 Comstock St	X	
\$ 86.40	12272 Comstock St	X	
\$ 86.40	12276 Comstock St	X	
\$ 86.40	12449 Comstock St	X	
\$ 86.40	12513 Comstock St		\$ 86.40
\$ 86.40	12525 Comstock St	X	
\$ 86.40	12545 Comstock St	X	
\$ 86.40	12549 Comstock St	X	
\$ 86.40	12553 Comstock St	X	
\$ 86.40	12562 Comstock St	X	
\$ 86.40	12563 Comstock St	X	
\$ 86.40	12573 Comstock St	X	
\$ 86.40	12587 Comstock St Street	X	
\$ 86.40	12596 Comstock St	X	
\$ 86.40	12597 Comstock St		\$ 86.40
\$ 86.40	12636 Comstock St	X	
\$ 86.40	12641 Comstock St	X	
\$ 86.40	12646 Comstock St St	X	
\$ 86.40	12656 Comstock St	X	
\$ 86.40	12665 / 12657 Comstock St	X	
\$ 86.40	12666 Comstock St Street	X	
\$ 86.40	10854 Utley Avenue	X	
\$ 86.40	10862 Utley Avenue	X	
\$ 86.40	10867 Utley Avenue	X	
\$ 86.40	10893 Utley Avenue	X	
\$ 86.40	10911 Utley Avenue	X	
\$ 86.40	10925 Utley Avenue	X	
\$ 86.40	12156 Center St	X	
\$ 86.40	12255 Center St W	X	
\$ 86.40	12413 Center	X	
\$ 86.40	12447 Center Street	X	
\$ 86.40	12536 Center Street	X	

<b><u>YEARLY</u></b>			
<b><u>BILLING</u></b>			
<b><u>AMOUNT 2022</u></b>	<b><u>SERVICE ADDRESS</u></b>	<b><u>PAID</u></b>	<b><u>Unpaid</u></b>
\$ 86.40	12576 Center	X	
\$ 86.40	12626 Center Street	X	
\$ 86.40	11013 Kepler	X	
\$ 86.40	11005 Kepler		\$ 86.40
\$ 86.40	11020 Kepler	X	
\$ 86.40	11030 Kepler St	X	
\$ 86.40	11036 Kepler Avenue	X	
\$ 172.70	10857 Brown Street	X	
\$ 172.70	12512 Reed Ave	X	
\$ 172.70	10974 Henry Street	X	
\$ 172.70	10987 Henry St	X	
\$ 172.70	12236 Comstock St	X	
\$ 172.70	12239 Comstock St	X	
\$ 172.70	12273 Comstock St	X	
\$ 172.70	12283 Comstock St	X	
\$ 172.70	12288 Comstock St	X	
\$ 172.70	12290 Comstock	X	
\$ 172.70	12291 Comstock St	X	
\$ 172.70	12303 Comstock St	X	
\$ 172.70	12499 Comstock St	X	
\$ 172.70	12538 Comstock St	X	
\$ 172.70	12554 Comstock St	X	
\$ 172.70	12572 Comstock St St	X	
\$ 172.70	12583 Comstock St St	X	
\$ 172.70	12608 Comstock St	X	
\$ 172.70	12626 Comstock St Street	X	
\$ 172.70	12645 Comstock St St	X	
\$ 172.70	12676 Comstock St	X	
\$ 172.70	10833 Utley Avenue	X	
\$ 172.70	10836 Utley Avenue	X	
\$ 172.70	10845 Utley Avenue	X	
\$ 172.70	10861 Utley Avenue	X	
\$ 172.70	10868 Utley Avenue	X	
\$ 172.70	10877 Utley Avenue	X	
\$ 172.70	12251 Center St W	X	
\$ 172.70	12315 Center Street	X	
\$ 172.70	12335 Center St	X paid yr fee	
\$ 172.70	12439 Center St	X	
\$ 172.70	12476 Center Street	X	
\$ 172.70	12546 Center	X	
\$ 172.70	12556 Center St	X	
\$ 172.70	12612 Center	X	
\$ 172.70	10975 Kepler Avenue	X	

<b><u>YEARLY</u></b>			
<b><u>BILLING</u></b>			
<b><u>AMOUNT 2022</u></b>	<b><u>SERVICE ADDRESS</u></b>	<b><u>PAID</u></b>	<b><u>Unpaid</u></b>
\$ 172.70	11016 Kepler	X	
\$ 172.70	11006 Kepler	X	
\$ 218.10	12489 Center St	X	
\$ 345.50	12302 Comstock St	X	
\$ 518.10	12455 Comstock St		172.7
\$ 518.10	10825 Utley Avenue	X	
\$ 720.00	10869 Brown St		\$ 720.00
\$ 1,200.00	12543 Reed Ave	X	
\$ 3,082.40	Hotel Conneaut -12241 Lake St	X	

**Total:**        \$        1,324.70

**BUREAU OF INVESTIGATION AND ENFORCEMENT DATA REQUESTS**

**CONNEAUT LAKE PARK WATER CORPORATION, INC.**

**Docket No. R-2023-3041575**

**Analyst: Zac Walker**

**I&E-RE-2-D** Provide the following in Microsoft Excel format with all cells enabled and all formulas intact:

- A. Conneaut Lake Park Water Corporation, Inc. Filing, Schedule D, Statements of Income; and
- B. Conneaut Lake Park Water Corporation, Inc. Filing, Schedule D, Income Tax Calculation.

**RESPONSE:**

- A. Please see 'I&E-RE-2 Attachment' for the Excel format of Schedule D, Statements of Income and Income Tax Calculation.
- B. Please see 'I&E-RE-2 Attachment' for the Excel format of Schedule D, Statements of Income and Income Tax Calculation.

Responsible Witness: C. Heppenstall  
Date: 10-10-23



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

	Actual for the Year Ended 12/2022		Annualization Adjustments (3)	Totals as Annualized (4=2+3)	Proposed Increase (5)	Totals after Increase (6=4+5)
	Prior Year 2021	Test Year 2022				
	(1)	(2)				
<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	\$ -	3,500		3,500
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	\$ 22,437	\$ 114,772	\$ 55,582	\$ 170,354
<b>Net Operating Income</b>	\$ (66,422)	\$ (72,834)	\$ (15,382)	\$ (88,217)	\$ 202,215	\$ 113,998
421.0 Non-Operating Income				\$ -		-
<b>Non-Operating Deductions:</b>						
426.0 Other				-		-
427.0 Interest	\$ -			-		-
<b>Net Income</b>	\$ (66,422)	\$ (72,834)	\$ (15,382)	\$ (88,217)	\$ 202,215	\$ 113,998

1. Carried over from Statements of Revenues

CONNEAUT LAKE PARK WATER CORPORATION  
 Income Tax Calculation

Schedule D (cont.)

Description	Test Year Income Taxes at Present Rates	Pro Forma Proposed Income Taxes
TAXABLE INCOME - STATE (Current)	\$ (88,217)	\$ 156,688
INCOME TAXES - STATE Current at 8.99%	-	14,086
TAXABLE INCOME - FEDERAL (Current)	\$ (88,217)	\$ 142,601
INCOME TAXES - FEDERAL Current at 21%	-	29,946

**BUREAU OF INVESTIGATION AND ENFORCEMENT DATA REQUESTS**

**CONNEAUT LAKE PARK WATER CORPORATION, INC.**

**Docket No. R-2023-3041575**

**Analyst: Zac Walker**

**I&E-RE-3-D** Reference Conneaut Lake Park Water Corporation, Inc. filing Schedule D, Statements of Income, provide a similar schedule (in pdf and Microsoft Excel format with all cells enabled and formulas intact) with an additional column prior to the existing Column 1 for Prior Year 2020 data.

**RESPONSE:**

Please see 'I&E-RE-3-D Attachment' for Schedule D that includes prior year 2020 data. Please note that the information for year 2020 is sourced from the PUC Annual Reports of the previous owners of the water system, Trustees of Conneaut Lake Park, Inc.

Responsible Witness: C. Heppenstall

Date: 10-10-23

Name of Utility: Conneaut Lake Park Water Corporation

## Statements of Income

	Actual for the Year Ended 12/2022			Annualization Adjustments (4)	Totals as Annualized (5=3+4)	Proposed Increase (6)	Totals after Increase (7=5+6)
	Prior Year 2020 <sup>2</sup> (1)	Prior Year 2021 <sup>2</sup> (2)	Test Year 2022 (3)				
<b>Total Revenue: 1</b>	\$ 38,379	\$ 22,000	\$ 19,500	\$ 7,055	\$ 26,555	\$ 257,797	\$ 284,352
<b>Operating Expenses:</b>							
601.0 Operator	\$ 11,000	\$ 24,000	\$ 24,000		\$ 24,000		\$ 24,000
620.0 Operating Supplies					-		-
601.0 Maintenance Labor					-		-
620.0 Maintenance Supplies	18				-		-
610.0 Purchased Water					-		-
615.0 Purchased Power		21,500	23,000		23,000		23,000
635.0 Testing Expense	2,236				-		-
618.0 Chemicals	2,682				-		-
655.0 Insurance	8,338				-		-
601.0 General Office Salaries					-		-
675.0 General Office Expenses	3,692	3,500	3,500	\$ -	3,500		3,500
675.0 Uncollectible Accounts				1,325	1,325	\$ 12,893	14,218
665.0 Regulatory Commission Expenses	741						
665.0 Rate Case Expense				20,000	20,000		20,000
403.0 Depreciation Expense	33,269	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>	\$ 61,976	\$ 88,422	\$ 92,334	\$ 22,437	\$ 114,772	\$ 55,582	\$ 170,354
<b>Net Operating Income</b>	\$ (23,597)	\$ (66,422)	\$ (72,834)	\$ (15,382)	\$ (88,217)	\$ 202,215	\$ 113,998
421.0 Non-Operating Income					\$ -		-
<b>Non-Operating Deductions:</b>							
426.0 Other					-		-
427.0 Interest	\$ -	\$ -			-		-
<b>Net Income</b>	\$ (23,597)	\$ (66,422)	\$ (72,834)	\$ (15,382)	\$ (88,217)	\$ 202,215	\$ 113,998

1. Carried over from Statements of Revenues

2. Information is sourced from the PUC Annual Reports of the previous owners of the water system, Trustees of Conneaut Lake Park, Inc.

CONNEAUT LAKE PARK WATER CORPORATION  
 Income Tax Calculation

Schedule D (cont.)

Description	Test Year Income Taxes at Present Rates	Pro Forma Proposed Income Taxes
TAXABLE INCOME - STATE (Current)	\$ (88,217)	\$ 156,688
INCOME TAXES - STATE Current at 8.99%	-	14,086
TAXABLE INCOME - FEDERAL (Current)	\$ (88,217)	\$ 142,601
INCOME TAXES - FEDERAL Current at 21%	-	29,946

**BUREAU OF INVESTIGATION AND ENFORCEMENT DATA REQUESTS**

**CONNEAUT LAKE PARK WATER CORPORATION, INC.**

**Docket No. R-2023-3041575**

**Analyst: Zac Walker**

**I&E-RE-4-D** Reference Conneaut Lake Park Water Corporation, Inc. filing Schedule D, Income Tax Calculation, concerning income taxes, provide the following:

- A. The calculation supporting the pro forma proposed taxable state income amount of \$151,908;
- B. The calculation supporting the pro forma proposed taxable federal income amount of \$138,251;
- C. Pennsylvania state income tax return for Conneaut Lake Park Water Corporation, Inc. for the year ended December 31, 2020, and the HTY; and
- D. Federal income tax return for Conneaut Lake Park Water Corporation, Inc. for the year ended December 31, 2020, and the HTY.

**RESPONSE:**

A. The proposed taxable state income amount equals the total revenue in column 6 of Schedule D, Statements of Income minus the total Operating Expenses in column 6, which is calculated taking \$284,352 of proposed revenue minus \$132,444 in Operating Expenses to equal \$151,908 in proposed taxable state income. Please also reference the response to I&E-RE-2-D.

B. The proposed taxable federal income is calculated by subtracting the \$13,656 of calculated proposed state income taxes from the \$151,908 of state taxable income to equal \$138,251 in federal taxable income. Please also reference the response to I&E-RE-2-D.

C. & D. Please see 'I&E-RE-4-D Attachment' for the 2022 state and federal income tax returns.

Responsible Witness: C. Heppenstall

Date: 10-10-23

2203114364

**PA-40 Schedule C - 2022**  
**(05-22) Profit or Loss From Business or Profession (Sole Proprietorship)**

167680648 TODD JOSEPH

Method of Inventory: C=Cost, L=Lower of cost or market, O=Other C

WATER COMPANY UTILITIES

Accounting Method: A=Accrual, C=Cash, O=Other C

863734762 CLP WATER PARK LLC

Home office expenses deducted N

221000 Business out of existence N

713 BROAD ACRES RD

Any change in determining quantities, costs or valuations N

NARBERTH PA 19072

1a. Gross receipts or sales	1A	19500	2. Cost of goods sold/operations	2	0
1b. Returns and allowances	1B	0	3. Gross profit	3	19500
1c. Balance	1C	19500	4. Other Income (submit statement)	4	0
			5. Total income	5	19500
6. Advertising	6	0	28. Supplies (not included on Schedule C-1)	28	0
7. Amortization	7	0	29. Taxes	29	0
8. Bad debts from sales or services	8	0	30. Telephone	30	0
9. Bank charges	9	0	31. Travel and entertainment	31	0
10. Car and truck expenses	10	0	32. Utilities	32	0
11. Commissions	11	0	33. Wages	33	0
12. Cost depletion not % depletion	12	0	34. IDCs (1/3 current expensing)	34	0
			35. IDCs (amortization)	35	0
			36. Start-up costs (direct expense)	36	0
13a. Regular depreciation	13A	10333	37. Other expenses (specify):		
13b. Section 179 expense	13B	0			
14. Dues and publications	14	0	A	A	0
15. Other employee benefit programs	15	0	B	B	0
16. Freight (not on Schedule C-1)	16	0	C	C	0
17. Insurance	17	0	D	D	0
18. Interest on business indebtedness	18	0	E	E	0
			F	F	0
19. Laundry and cleaning	19	0	G	G	0
20. Legal and professional services	20	0	H	H	0
21. Management fees	21	0	I	I	0
22. Office supplies	22	0	J	J	0
23. Pension and profit-sharing plans	23	0			
24. Postage	24	0	37. Total other expenses	37	0
25. Rent on business property	25	0	38. Total expenses (add Lines 6 through 37)	38	34333
26. Repairs	26	0	39. Net profit or loss	39	-14833
27. Subcontractor fees	27	24000			



2203114364

2203114364

2203214370

**PA-40 Schedule C - 2022**

Social Security Number 167680648

Name of owner TODD JOSEPH

**SCHEDULE C-1 - Cost of Goods Sold and/or Operations**

1. Inventory at beginning of year (if different from last year's closing inventory, include explanation)	1	0
2a. Purchases	2A	0
2b. Cost of items withdrawn for personal use	2B	0
2c. Balance (subtract Line 2b from Line 2a)	2C	0
3. Cost of labor (do not include salary paid to yourself or subcontractor fees)	3	0
4. Materials and supplies	4	0
5. Other costs (include schedule)	5	0
6. Add Lines 1, 2c, 3, 4, and 5	6	0
7. Inventory at end of year	7	0
8. Cost of goods sold and/or operations (subtract Line 7 from Line 6) Enter here and on Section I, Line 2	8	0

**SCHEDULE C-2 - Depreciation (See Instructions)**

1. Total Section 179 depreciation (do not include in items below)	1	0
2. Less: Section 179 depreciation included in Schedule C-1	2	0
3. Balance (subtract Line 2 from Line 1). Enter here and on Section II, Line 13b	3	0

4. Other depreciation:

Description of property (a)	Date acquired (b)	Cost or other basis (c)	Depreciation allowed or allowable in prior years (d)	Method of computing depreciation (e)	Life or rate (f)	Depreciation for this year (g)
Buildings	4A	0	0			0
Furniture/fixtures	4B	0	0			0
Trans. equipment	4C	0	0			0
Machinery	4D	0	0			0
Other (specify)						
WATER	4E 07012021	403000	4735	SL	39	10333
	4F	0	0			0
	4G	0	0			0
	4H	0	0			0
	4I	0	0			0
	4J	0	0			0
	4K	0	0			0
	4L	0	0			0
	4M	0	0			0
	4N	0	0			0
	4O	0	0			0
	4P	0	0			0

5. Totals	403000	5	10333
6. Depreciation included in Schedule C-1		6	0
7. Balance (subtract Line 6 from Line 5) Enter here and on Section II, Line 13a		7	10333





**SCHEDULE C  
(Form 1040)**

**Profit or Loss From Business**  
(Sole Proprietorship)

OMB No. 1545-0074

**2022**

Department of the Treasury  
Internal Revenue Service

Go to [www.irs.gov/ScheduleC](http://www.irs.gov/ScheduleC) for instructions and the latest information.

Attachment  
Sequence No. **09**

Attach to Form 1040, 1040-SR, 1040-NR, or 1041; partnerships must generally file Form 1065.

Name of proprietor  
**TODD JOSEPH**

Social security number (SSN)  
**XXX-XX-XXXX**

**A** Principal business or profession, including product or service (see instructions)  
**WATER COMPANY**

**B** Enter code from instructions  
**221000**

**C** Business name. If no separate business name, leave blank.  
**CLP WATER PARK LLC**

**D** Employer ID number (EIN) (see instr.)  
**86-3734762**

**E** Business address (including suite or room no.) **713 BROAD ACRES RD**  
City, town or post office, state, and ZIP code **Narberth, PA 19072**

**F** Accounting method: (1)  Cash (2)  Accrual (3)  Other (specify)

**G** Did you "materially participate" in the operation of this business during 2022? If "No," see instructions for limit on losses. . . . .  Yes  No

**H** If you started or acquired this business during 2022, check here . . . . .  Yes  No

**I** Did you make any payments in 2022 that would require you to file Form(s) 1099? See instructions . . . . .  Yes  No

**J** If "Yes," did you or will you file required Form(s) 1099? . . . . .  Yes  No

**Part I Income**

1	Gross receipts or sales. See instructions for line 1 and check the box if this income was reported to you on Form W-2 and the "Statutory employee" box on that form was checked . . . . . <input type="checkbox"/>	1	19,500
2	Returns and allowances . . . . .	2	0
3	Subtract line 2 from line 1 . . . . .	3	19,500
4	Cost of goods sold (from line 42) . . . . .	4	
5	<b>Gross profit.</b> Subtract line 4 from line 3. . . . .	5	19,500
6	Other income, including federal and state gasoline or fuel tax credit or refund (see instructions) . . . . .	6	
7	<b>Gross income.</b> Add lines 5 and 6 . . . . .	7	19,500

**Part II Expenses.** Enter expenses for business use of your home **only** on line 30.

8	Advertising . . . . .	8		18	Office expense (see instructions) . . . . .	18	
9	Car and truck expenses (see instructions) . . . . .	9		19	Pension and profit-sharing plans . . . . .	19	
10	Commissions and fees . . . . .	10		20	Rent or lease (see instructions):	20	
11	Contract labor (see instructions) . . . . .	11	24,000	a	Vehicles, machinery, and equipment . . . . .	20a	
12	Depletion . . . . .	12		b	Other business property . . . . .	20b	
13	Depreciation and section 179 expense deduction (not included in Part III) (see instructions) . . . . .	13	10,333	21	Repairs and maintenance . . . . .	21	65,784
14	Employee benefit programs (other than on line 19) . . . . .	14		22	Supplies (not included in Part III) . . . . .	22	
15	Insurance (other than health) . . . . .	15		23	Taxes and licenses . . . . .	23	
16	Interest (see instructions):			24	Travel and meals:		
a	Mortgage (paid to banks, etc.) . . . . .	16a		a	Travel . . . . .	24a	
b	Other . . . . .	16b		b	Deductible meals (see instructions) . . . . .	24b	
17	Legal and professional services . . . . .	17		25	Utilities . . . . .	25	
18	<b>Total expenses</b> before expenses for business use of home. Add lines 8 through 27a . . . . .	18		26	Wages (less employment credits) . . . . .	26	
19	Tentative profit or (loss). Subtract line 28 from line 7 . . . . .	19		27a	Other expenses (from line 48) . . . . .	27a	
20	Expenses for business use of your home. Do not report these expenses elsewhere. Attach Form 8829 unless using the simplified method. See instructions.	20		b	<b>Reserved for future use</b> . . . . .	27b	
	<b>Simplified method filers only:</b> Enter the total square footage of (a) your home: _____ and (b) the part of your home used for business: _____ . Use the Simplified Method Worksheet in the instructions to figure the amount to enter on line 30 . . . . .	30		28		28	100,117
31	<b>Net profit or (loss).</b> Subtract line 30 from line 29.	31		29		29	(80,617)
	• If a profit, enter on both <b>Schedule 1 (Form 1040), line 3</b> , and on <b>Schedule SE, line 2</b> . (If you checked the box on line 1, see instructions.) Estates and trusts, enter on <b>Form 1041, line 3</b> .					31	(80,617)
	• If a loss, you <b>must</b> go to line 32.						
32	If you have a loss, check the box that describes your investment in this activity. See instructions.						
	• If you checked 32a, enter the loss on both <b>Schedule 1 (Form 1040), line 3</b> , and on <b>Schedule SE, line 2</b> . (If you checked the box on line 1, see the line 31 instructions.) Estates and trusts, enter on <b>Form 1041, line 3</b> .					32a	<input checked="" type="checkbox"/> All investment is at risk.
	• If you checked 32b, you <b>must</b> attach <b>Form 6198</b> . Your loss may be limited.					32b	<input type="checkbox"/> Some investment is not at risk.

For Paperwork Reduction Act Notice, see the separate instructions.

**BUREAU OF INVESTIGATION AND ENFORCEMENT DATA REQUESTS**

**CONNEAUT LAKE PARK WATER CORPORATION, INC.**

**Docket No. R-2023-3041575**

**Analyst: Zac Walker**

**I&E-RE-5-D** Reference Conneaut Lake Park Water Corporation, Inc. filing Schedule D, Statements of Income, concerning Operator Expense. Provide a detailed breakdown with supporting documentation, including all workpapers, receipts, and/or invoices, of the \$24,000 incurred in the HTY.

**RESPONSE:**

See attached Operator Agreement and four quarterly invoices.

Responsible Witness: T. Joseph/C. Heppenstall

Date: 10-10-23

Keystone Water Systems LLC  
2405 Georgetown Rd.  
Sandy Lake, PA 16145  
(724) 376-7013



This document serves as an **Operating Agreement** between Keystone Water Systems LLC (Christopher R. Greenberg) and Conneaut Lake Water Corporation Inc.

The terms of this agreement are as follows:

1. Christopher Greenberg of Keystone Water Systems LLC shall assume the role of "Certified Operator" for the Water treatment plant and distribution system at Conneaut Lake Park on a "month to month" basis, contingent upon payment and cooperation.
2. The total amount due for Operations of the Water system at Conneaut Lake Park is \$24,000 Annually. This fee includes Daily operation / maintenance, reporting, record-keeping, Compliance sampling, Treatment chemicals, sampling reagents, and lab fees.
3. Items not included in Operating fees include the following:
  - a. Distribution leak repair and materials.
  - b. Repairing or replacing broken equipment (well pumps, chemical feed pumps, controls, electrical components, etc..).
4. All services provided by KWS that are not included in the operating fee shall be provided at reasonable pricing.
5. **Quarterly payments of \$6,000.00 shall be made to Keystone Water Systems within 30 days from receiving an invoice.**
6. Daily visits will consist of required daily monitoring, routine maintenance, and general upkeep and housekeeping of the facilities.
7. Should KWS or Conneaut Lake Water Corporation Inc. end this agreement, any services that have been paid for but not yet provided will be refunded. Likewise, any services provided but not yet paid for will be paid for immediately.

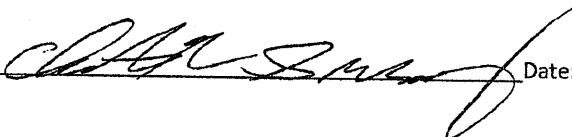
**Disclaimer:**

**KWS cannot/will not be held responsible for non-compliance due to lack of cooperation or funding.**

Keystone Water Systems LLC  
2405 Georgetown Rd.  
Sandy Lake, PA 16145  
(724) 376-7013



I, Christopher R. Greenberg of Keystone Water Systems LLC agree to the terms of this agreement.

Signature:  Date: 3-30-22

I, \_\_\_\_\_ of \_\_\_\_\_ agree to the terms of this agreement.

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

---

# Keystone Water Systems

P.O. Box 463  
Sandy Lake, PA 16145  
Phone: (724)376-7013

Website: kestonewatersystems.com

## INVOICE

DATE	1/29/2022
INVOICE #	[4066]
CUSTOMER ID	[clp]
DUE DATE	upon receipt

### BILL TO

Todd Joseph Properties  
Todd Joseph  
(610)563-7556  
[tjosephproperties@hotmail.com](mailto:tjosephproperties@hotmail.com)

DESCRIPTION	TAXED	AMOUNT
certified operator for Conneaut Lake Park Water Plant.  4 month period (March, April, May, June, 2022)	exempt	

Subtotal	6,000.00
Taxable	-
Tax rate	0.000%
Tax due	-
Other	-
<b>TOTAL</b>	<b>\$ 6,000.00</b>

### OTHER COMMENTS

1. Total payment due in 30 days
2. Please include the invoice number on your check
3. Please include a 2% late fee if payment is past 30 days.

Make all checks payable to  
**Keystone Water Systems**

If you have any questions about this invoice, please contact  
Chris Greenberg (724)376-7013

***Thank You For Your Business!***

# Keystone Water Systems

# INVOICE

P.O. Box 463  
Sandy Lake, PA 16145  
Phone: (724)376-7013

Website: kestonewatersystems.com

DATE	2/28/2022
INVOICE #	[4070]
CUSTOMER ID	[clp]
DUE DATE	upon receipt

## BILL TO

CLP Water Park LLC  
Todd Joseph  
(610)563-7556  
[tjosephproperties@hotmail.com](mailto:tjosephproperties@hotmail.com)

DESCRIPTION	TAXED	AMOUNT
certified operator for Conneaut Lake Park Water Plant.	exempt	
<b>3 month period (March, April, May 2023)</b>		6,000.00

Subtotal	6,000.00
Taxable	-
Tax rate	0.000%
Tax due	-
Other	-
<b>TOTAL</b>	<b>\$ 6,000.00</b>

## OTHER COMMENTS

1. Total payment due in 30 days
2. Please include the invoice number on your check
3. Please include a 2% late fee if payment is past 30 days.

Make all checks payable to  
**Keystone Water Systems**

If you have any questions about this invoice, please contact  
Chris Greenberg (724)376-7013

***Thank You For Your Business!***

# Keystone Water Systems

# INVOICE

P.O. Box 463  
Sandy Lake, PA 16145  
Phone: (724)376-7013

Website: kestonewatersystems.com

DATE	8/31/2022
INVOICE #	[4068]
CUSTOMER ID	[clp]
DUE DATE	upon receipt

## BILL TO

CLP Water Park LLC  
Todd Joseph  
(610)563-7556  
[tjosephproperties@hotmail.com](mailto:tjosephproperties@hotmail.com)

DESCRIPTION	TAXED	AMOUNT
certified operator for Conneaut Lake Park Water Plant.	exempt	
<b>3 month period (Sept, Oct, Nov 2022)</b>		6,000.00
replaced pressure control at tower(July) power surge		500.00
replaced pressure control at tower(August) factory defect sent back to factory under warranty but had to get replacement Purchased 2 used controls from ebay as backup once original is returned will have 3 units		550.00

Subtotal	7,050.00
Taxable	-
Tax rate	0.000%
Tax due	-
Other	-
<b>TOTAL</b>	<b>\$ 7,050.00</b>

## OTHER COMMENTS

1. Total payment due in 30 days
2. Please include the invoice number on your check
3. Please include a 2% late fee if payment is past 30 days.

Make all checks payable to  
**Keystone Water Systems**

If you have any questions about this invoice, please contact  
Chris Greenberg (724)376-7013

***Thank You For Your Business!***

# Keystone Water Systems

# INVOICE

P.O. Box 463  
Sandy Lake, PA 16145  
Phone: (724)376-7013

Website: kestonewatersystems.com

DATE	11/30/2022
INVOICE #	[4069]
CUSTOMER ID	[clp]
DUE DATE	upon receipt

## BILL TO

CLP Water Park LLC  
Todd Joseph  
(610)563-7556  
[tjosephproperties@hotmail.com](mailto:tjosephproperties@hotmail.com)

DESCRIPTION	TAXED	AMOUNT
certified operator for Conneaut Lake Park Water Plant.	exempt	
<b>3 month period (Dec, Jan, Feb)</b>		6,000.00
replaced pressure control at tower(July) power surge		500.00
replaced pressure control(August)		

Subtotal	6,500.00
Taxable	-
Tax rate	0.000%
Tax due	-
Other	-
<b>TOTAL</b>	<b>\$ 6,500.00</b>

## OTHER COMMENTS

1. Total payment due in 30 days
2. Please include the invoice number on your check
3. Please include a 2% late fee if payment is past 30 days.

Make all checks payable to  
**Keystone Water Systems**

If you have any questions about this invoice, please contact  
Chris Greenberg (724)376-7013

***Thank You For Your Business!***



**BUREAU OF INVESTIGATION AND ENFORCEMENT DATA REQUESTS**

**CONNEAUT LAKE PARK WATER CORPORATION, INC.**

**Docket No. R-2023-3041575**

**Analyst: Zac Walker**

**I&E-RE-6-D** Reference Conneaut Lake Park Water Corporation, Inc. filing Schedule D, Statements of Income, concerning Purchased Power Expense. Provide a detailed breakdown with supporting documentation, including all receipts and invoices, of the \$23,000 incurred in the HTY.

**RESPONSE:**

Please reference response to TUS-1-6 for the supporting documentation for purchased power expense.

Responsible Witness: C. Heppenstall  
Date: 10-10-23

**BUREAU OF INVESTIGATION AND ENFORCEMENT DATA REQUESTS**

**CONNEAUT LAKE PARK WATER CORPORATION, INC.**

**Docket No. R-2023-3041575**

**Analyst: Zac Walker**

**I&E-RE-7-D** Reference Conneaut Lake Park Water Corporation, Inc. filing Schedule D, Statements of Income, concerning General Office Expenses:

- A. Provide a detailed breakdown with supporting documentation, including all receipts and invoices, of the \$3,500 incurred in the HTY.
- B. Provide all supporting documentation available for the annualization adjustment of \$4,780.

**RESPONSE:**

- A. General Office Expense includes the expense for billing and customer service and management of the water system. The accounting for 2022 is shown below. The total is \$9,234.07 only \$3,500 was claimed as management time was excluded due to lack of funding.

	<u>Amount</u>	<u>Item</u>	<u>Total</u>
Paper	3	\$ 7.57	\$ 22.71
Ink	2	\$ 33.99	\$ 67.98
Envelopes	2	\$ 8.69	\$ 17.38
Stamps	2	\$ 63.00	\$ 126.00
Labor costs	150	\$ 20.00	\$3,000.00
Subtotal			<u>\$3,234.07</u>
Management			<u>\$6,000.00</u>
Total			<u>\$9,234.07</u>

- B. The Company anticipates an additional \$4,780 in General Office costs due to monthly billing to customers. These costs are broken out as follows:

Stamps	\$ 840
Envelopes	240
Paper	100
Ink	1,200
Labor	2,400
Total	\$4,780

Responsible Witness: T. Joseph/C. Heppenstall

Date: 10-10-23

**BUREAU OF INVESTIGATION AND ENFORCEMENT DATA REQUESTS**

**CONNEAUT LAKE PARK WATER CORPORATION, INC.**

**Docket No. R-2023-3041575**

**Analyst: Zac Walker**

**I&E-RE-8-D**      Regarding affiliated companies:

- A.      Provide a complete organizational chart of commonly owned companies, including holding and/or parent companies and all subsidiaries/sister companies, of which Conneaut Lake Park Water Corporation, Inc. is a part. In the response, indicate whether each identified company is a regulated or a non-regulated entity.
- B.      Identify all entities affiliated with Conneaut Lake Park Water Corporation, Inc. and describe the nature of the affiliation.
- C.      Provide a list of Commission docket numbers for all affiliated interest agreements, and copies of any agreements not yet reviewed and/or approved by the Commission.

**RESPONSE:**

- A.                      CLP Water Park LLC is the sole shareholder of Conneaut Lake Park Water Corporation, Inc. There are no other commonly owned companies associated with those two companies. Water Corporation is the only regulated entity.
- B.                      CLP Water Park LLC is the sole shareholder of Conneaut Lake Park Water Corporation, Inc.
- C.                      None.

Responsible Witness: T. Joseph  
Date: 10-10-23

**BUREAU OF INVESTIGATION AND ENFORCEMENT DATA REQUESTS**

**CONNEAUT LAKE PARK WATER CORPORATION, INC.**

**Docket No. R-2023-3041575**

**Analyst: Zac Walker**

**I&E-RE-9-D**

Indicate whether Conneaut Lake Park Water Corporation, Inc. performs services or receives services from any commonly owned entity. If yes, provide the following:

- A. Copies of all source documents and related workpapers for allocation factors used to allocate funds for services performed for or by any affiliated companies;
- B. A list of general ledger account numbers/names of all accounts to which expenses are allocated; and
- C. A breakdown of 2020, 2021 and 2022 actual expenses, and the FTY claims by year for expenses allocated from any commonly owned company by type.

**RESPONSE:**

- A. Conneaut Lake Park Water Corporation, Inc. performs no services or receives no services from any commonly owned entity.
- B. N/A
- C. N/A

Responsible Witness: T. Joseph

Date: 10-10-23

**BUREAU OF INVESTIGATION AND ENFORCEMENT DATA REQUESTS**

**CONNEAUT LAKE PARK WATER CORPORATION, INC.**

**Docket No. R-2023-3041575**

**Analyst: Zac Walker**

**I&E-RE-10-D** Reference Conneaut Lake Park Water Corporation, Inc. filing, Schedule D, Statements of Income, concerning the absence of a chemical expense claim:

- A. Provide a detailed explanation for the absence of expenses related to chemicals for water treatment.
- B. Provide actual chemical expense incurred for 2020, 2021, and 2022 by calendar year, and the FTY claim amount along with the account number in which this expense is included.

**RESPONSE:**

- A. Conneaut Lake Park Water system is operated by Keystone Water Systems, therefore the costs related to chemicals for water treatment are included in the \$24,000 Operator expense claim.
- B. Information prior to March 2023 is not available for the Company except for what is provided in the annual reports to the PUC of the previous owners, Trustees of Conneaut Lake Park, Inc.

**Chemicals Expense in Annual Reports:**

- 2020: \$2,682
- 2021: \$463
- 2022: This information is not available.
- FTY: See response to part A. The chemicals are included with the Operator expense.

Responsible Witness: T. Joseph/C. Heppenstall

Date: 10-10-23

**BUREAU OF INVESTIGATION AND ENFORCEMENT DATA REQUESTS**

**CONNEAUT LAKE PARK WATER CORPORATION, INC.**

**Docket No. R-2023-3041575**

**Analyst: Zac Walker**

**I&E-RE-11-D** Reference Conneaut Lake Park Water Corporation, Inc. filing, Schedule D, Statements of Income, concerning rate case expense, provide the following details for the three most recent base rate proceedings filed with the Commission:

- A. Docket number, date of the filing, and method of resolution, i.e., settlement or litigation;
- B. Forecasted rate case expense and actual rate case expense incurred; and
- C. Effective date of each rate increase.

**RESPONSE:**

This is the first rate case filed by the Company. Therefore, the responses to A., B., and C. are "Not Applicable."

Responsible Witness: C. Heppenstall  
Date: 10-10-23

**BUREAU OF INVESTIGATION AND ENFORCEMENT DATA REQUESTS**

**CONNEAUT LAKE PARK WATER CORPORATION, INC.**

**Docket No. R-2023-3041575**

**Analyst: Zac Walker**

**I&E-RE-12-D** Reference Conneaut Lake Park Water Corporation, Inc. filing, Schedule D, Statements of Income, concerning rate case expense, provide the following:

- A. Breakdown by category of Conneaut Lake Park Water Corporation, Inc.'s actual rate case expenses from its prior rate case filing;
- B. Copies of all outside service contract agreements for rate case-related services for the current filing;
- C. Receipts, bills, and estimates for rate case expenses incurred to date for the current filing;
- D. Support for the three-year normalization of rate case expense for the instant proceeding as stated in the Statement of Reasons, p. 3;
- E. Supporting breakdown for the \$60,000 total claimed rate case expense for the instant proceeding;
- F. An estimated breakdown of rate case expense for the current proceeding:
  1. If the case is settled prior to testimony; and
  2. If the case is settled after testimony is prepared by the parties.

**RESPONSE:**

- A. This is the first rate case filed by the Company, not applicable.
- B. Please see 'I&E-RE-12-D Attachment.
- C. Please see 'I&E-RE-12-D Attachment.

**BUREAU OF INVESTIGATION AND ENFORCEMENT DATA REQUESTS**

**CONNEAUT LAKE PARK WATER CORPORATION, INC.**

**Docket No. R-2023-3041575**

**Analyst: Zac Walker**

- D. This is the Company's first rate case so there is no history of time between rate cases. Therefore, a normalization of rate case expense over several years is appropriate as the expense for a rate case is only incurred during the period of the actual rate case but the benefits of increased rates last more than one year.
- E. Please see responses to parts B and C. The estimate of the contracts prior to filing totaled \$60,000 and the year to date of rate case expense rate case expense invoiced through August 31, 2023 totals \$19,546. As the expenses through August 31, 2023 in 'IE-RE-12-D Attachment' do not include responding to interrogatories or rebuttal testimony, the \$60,000 claim is reasonable for this rate case expense claim, and, if anything, it may be low.
- F. We are unable at this time to provide a reliable estimate of the costs that will be incurred either if the case is settled prior to testimony or if the case is settled after testimony is prepared by the parties. All we can say is that settling before the hearing will result in lower costs.

Responsible Witness: C. Heppenstall

Date: 10-10-23





**Gannett Fleming Valuation  
and Rate Consultants, LLC**

Corporate Headquarters  
207 Senate Avenue  
Camp Hill, PA 17011  
P 717.763.7211 | F 717.763.8150  
gannettfleming.com

April 28, 2023

Via email to: [Tjosephproperties@hotmail.com](mailto:Tjosephproperties@hotmail.com)

Conneaut Lake Park Water Corporation, Inc.  
Attn: Todd Joseph  
713 Broad Acres Road  
Narberth, PA 19072

Dear Todd:

Proposal for Rate Consulting Services re Water Rate Case Filing

Gannett Fleming Valuation and Rate Consultants, LLC (Gannett Fleming) is pleased to submit this proposal to provide water rate consulting services to Conneaut Lake Park Water Corporation, Inc. (Corporation) related to its small utility rate case. Our submittal is based on information from our conversations with Corporation personnel and our experience in providing rate case consulting services to other utilities. This proposal provides our understanding of the scope of services and an estimate of our fees.

SCOPE OF SERVICES

We understand that the Corporation requires a consultant who has a thorough understanding of rate case procedures before the Pennsylvania Public Utility Commission (PUC). The Corporation plans to prepare to file a water base rate case with the PUC as soon as practical.

The filing will be under the Title 52, Chapter 53 Section 53.54 regulations which give guidance for the filing for small water companies with revenue under \$250,000 per year. Gannett Fleming will aid the Corporation in filing the necessary forms in order to apply for an increase in water rates.

The proposed rate structure for the water operations will consider existing rate structures and input from Corporation management. A proof of revenue schedule will be prepared to ensure that the proposed rate structures generate the desired level of revenue requirement.

Subsequent to the filing of the rate case, Gannett Fleming will respond to data requests from the PUC and other parties.



## ESTIMATE OF FEES

Gannett Fleming proposes to provide the water rate consulting services on the basis of hourly billing rates for our personnel in effect at the time the work is performed, plus reimbursement of direct expenses. A copy of our current billing rates is attached. Direct expenses include expenditures such as transportation, meals, lodging, incidental expenses incurred while working at the client's location, and any other expenses required by virtue of the assignment and not incidental to the normal conduct of business.

Based on our experience conducting similar assignments, we estimate that our fees up to the filing date will be approximately \$19,000. The foregoing estimate of costs to conduct the assignment up to the filing date excludes those services required subsequent to the filing, as we have little control over the effort required for discovery and hearings. Post-filing work will be performed at our hourly rates in effect at the time the services are rendered.

If the foregoing proposal is acceptable, please have it executed below by an authorized official of the Corporation and email a copy to Cheryl Rutter, our Administrative Manager, at [crutter@gfnet.com](mailto:crutter@gfnet.com) with a copy to Connie Heppenstall at [cheppenstall@gfnet.com](mailto:cheppenstall@gfnet.com).

Thank you for the opportunity to submit this proposal for your consideration. If you have any questions with respect to the scope of services or estimate of costs, please contact Connie at 610-783-3785 or via email at [cheppenstall@gfnet.com](mailto:cheppenstall@gfnet.com).

Respectfully submitted,

GANNETT FLEMING VALUATION  
AND RATE CONSULTANTS, LLC

A handwritten signature in black ink that reads 'John J. Spanos'.

JOHN J. SPANOS  
President

A handwritten signature in black ink that reads 'Constance E. Heppenstall'.

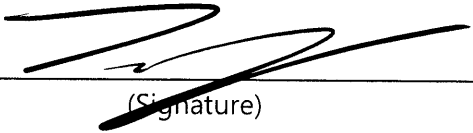
CONSTANCE E. HEPPENSTALL  
Project Manager, Rate Studies

CEH/mle



Conneaut Lake Park Water Corporation, Inc. accepts the foregoing Proposal and authorizes Gannett Fleming Valuation and Rate Consultants, LLC to proceed with the services described herein.

ACCEPTED BY:

  
\_\_\_\_\_  
(Signature)

Todd Joseph  
\_\_\_\_\_  
(Printed Name)

Owner  
\_\_\_\_\_  
(Title)

6-15-23  
\_\_\_\_\_  
(Date)



GANNETT FLEMING VALUATION AND RATE CONSULTANTS, LLC

2023 BILLING RATES

<u>Personnel</u>	<u>Hourly Rate</u>
SUPERVISORY STAFF	
John J. Spanos, President	\$310.00
Ned W. Allis, Vice President	280.00
Harold Walker, III, Manager, Financial Studies	280.00
Constance E. Heppenstall, Senior Project Manager, Rate Studies	270.00
John F. Wiedmayer, Jr., Senior Project Manager, Depreciation Studies	260.00
STAFF	
Senior Analysts	200.00
Analysts	190.00
Associate Analysts	180.00
Assistant Analysts III	170.00
Assistant Analysts II	160.00
Assistant Analysts I	150.00
Senior Technicians	130.00
Support Staff	130.00



Conneaut Lake Park Water Corporation, Inc.  
 Docket No. R-2023-3041575

**GANNETT  
 FLEMING**

Check Payment Information:  
 Gannett Fleming Valuation and Rate Consultants, LLC  
 PO Box 829160, Philadelphia, PA 19182-9160 Federal EIN: 46-4413705  
ACH/EFT Payment Information:  
 Account Name: Gannett Fleming Companies ABA: 031312738  
 Account No.: 5003165655  
 Send Remit Info: AccountsReceivable@gfnet.com  
 Send Audit Inquiries: GovtContractAudit@gfnet.com  
 All Other Inquires Contact the Project Team

**Attention:** Todd Joseph  
**Conneaut Lake Park Water Corporation Inc**  
 713 Broad Acres Road  
 Narberth, PA 19072  
 UNITED STATES

**Invoice :** 0000024795  
**Invoice Date :** 7/17/2023  
**Due Date:** 8/16/2023  
**Project :** 075496  
**Project Name :** Conneaut Lake Park Water Corp-  
 ConsSvcsWtrRateFiling  
**Bill Term :** 01

---

**For Professional Services Rendered Through 6/30/2023**

Consulting Services re Water Rate Case Filing

	<b>Current</b>
	<b><u>Billings</u></b>
000 - Consulting Services re Water Rate Case Filing	1,610.00
Total :	<u>1,610.00</u>
<b>Current Billings</b>	1,610.00
<b>Amount Due This Bill</b>	<b>US <u><u>1,610.00</u></u></b>

---

Constance E Heppenstall

000 - Consulting Services re Water Rate Case Filing

Rate Labor

<u>Class</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Constance E Heppenstall	5.00	270.000	1,350.00
Support Staff	2.00	130.000	260.00
<b>Total Rate Labor</b>	<b>7.00</b>		<b>1,610.00</b>
<b>Total Bill Task : 000 - Consulting Services re Water Rate Case Filing</b>			<b>1,610.00</b>

**Total Project : 075496 - Conneaut Lake Park Water Corp-ConsSvcsWtrRateFiling 1,610.00**



Check Payment Information:  
Gannett Fleming Valuation and Rate Consultants, LLC  
PO Box 829160, Philadelphia, PA 19182-9160 Federal EIN: 46-4413705  
ACH/EFT Payment Information:  
Account Name: Gannett Fleming Companies ABA: 031312738  
Account No.: 5003165655  
Send Remit Info: AccountsReceivable@gfnet.com  
Send Audit Inquiries: GovtContractAudit@gfnet.com  
All Other Inquires Contact the Project Team

**Attention:** Todd Joseph  
**Conneaut Lake Park Water Corporation Inc**  
713 Broad Acres Road  
Narberth, PA 19072  
UNITED STATES

**Invoice :** 0000025879  
**Invoice Date :** 8/14/2023  
**Due Date:** 9/13/2023  
**Project :** 075496  
**Project Name :** Conneaut Lake Park Water Corp-  
ConsSvcWtrRateFiling  
**Bill Term :** 01

---

**For Professional Services Rendered For 7/1/2023 Through 7/28/2023**

Consulting Services re Water Rate Case Filing

		<b>Current</b>
		<b>Billings</b>
000 - Consulting Services re Water Rate Case Filing		2,955.00
Total :		2,955.00
	<b>Current Billings</b>	2,955.00
	<b>Amount Due This Bill</b>	US 2,955.00

---

Constance E Heppenstall

	<u>Invoice Number</u>	<u>Date</u>	<u>Amount</u>	<u>Balance Due</u>
<b>Outstanding Receivables</b>	0000024795	7/17/2023	1,610.00	1,610.00
				1,610.00

**000 - Consulting Services re Water Rate Case Filing**

**Rate Labor**

<u>Class</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Analyst	1.00	190.000	190.00
Constance E Heppenstall	10.00	270.000	2,700.00
Support Staff	0.50	130.000	65.00
<b>Total Rate Labor</b>	<b>11.50</b>		<b>2,955.00</b>

**Total Bill Task : 000 - Consulting Services re Water Rate Case Filing** **2,955.00**

**Total Project : 075496 - Conneaut Lake Park Water Corp-ConsSvcsWtrRateFiling** **2,955.00**





**GANNETT  
FLEMING**

Conneaut Lake Park Water Corporation, Inc.  
Docket No. R-2023-3041575

I&E-RE-12-D Attachment  
Page 9 of 10

Check Payment Information:  
Gannett Fleming Valuation and Rate Consultants, LLC  
PO Box 829160, Philadelphia, PA 19182-9160 Federal EIN: 46-4413705  
ACH/EFT Payment Information:  
Account Name: Gannett Fleming Companies ABA: 031312738  
Account No.: 5003165655  
Send Remit Info: AccountsReceivable@gfnet.com  
Send Audit Inquiries: GovtContractAudit@gfnet.com  
All Other Inquires Contact the Project Team

Attention: Todd Joseph  
Conneaut Lake Park Water Corporation Inc  
713 Broad Acres Road  
Narberth, PA 19072  
UNITED STATES

Invoice : 0000027541  
Invoice Date : 9/25/2023  
Due Date: 10/25/2023  
Project : 075496  
Project Name : Conneaut Lake Park Water Corp-  
ConsSvcsWtrRateFiling  
Bill Term : 01

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**For Professional Services Rendered For 7/29/2023 Through 8/25/2023**

Consulting Services re Water Rate Case Filing

	<u>Current</u> <u>Billings</u>
000 - Consulting Services re Water Rate Case Filing	1,660.00
Total :	<u>1,660.00</u>
<b>Current Billings</b>	<u>1,660.00</u>
<b>Amount Due This Bill</b>	<b>US <u><u>1,660.00</u></u></b>

---

Constance E Heppenstall

**000 - Consulting Services re Water Rate Case Filing**

**Rate Labor**

<u>Class</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Analyst	2.00	190.000	380.00
Constance E Heppenstall	4.50	270.000	1,215.00
Support Staff	0.50	130.000	65.00
<b>Total Rate Labor</b>	<b>7.00</b>		<b>1,660.00</b>

**Total Bill Task : 000 - Consulting Services re Water Rate Case Filing** **1,660.00**

**Total Project : 075496 - Conneaut Lake Park Water Corp-ConsSvcsWtrRateFiling** **1,660.00**

MARK J. SHAW, ESQ.  
ADMITTED IN PA AND OH  
DIRECT DIAL 814-870-7607  
E-MAIL [MSHAW@MIJB.COM](mailto:MSHAW@MIJB.COM)

June 20, 2023

VIA FIRST CLASS AND ELECTRONIC MAIL

Conneaut Lake Park Water Corp.  
c/o Todd Joseph  
713 Broad Acres Road  
Narberth, PA 19072

Re: Legal Representation

Dear Todd:

The purpose of this engagement letter is to confirm the terms and conditions upon which MacDonald, Illig, Jones & Britton LLP ("MacDonald Illig") will represent Conneaut Lake Park Water Corporation ("CLPWC") with respect to issues related to a request to increase rates and a petition to be exempted from metering requirements.

It is MacDonald Illig's practice to confirm in writing the identity of any client whom we represent, the nature of our undertaking on behalf of that client and our billing and payment arrangements with respect to our legal services.

You have asked MacDonald Illig to represent CLPWC in accordance with the scope described in the first paragraph of this letter.

In order to enable us to effectively render these services, CLPWC, has agreed to fully and accurately disclose all facts and to keep us apprised of all developments relating to this matter. You also have agreed to cooperate fully with us and make employees available for meetings, depositions, hearings, trial and other proceedings. Since the outcome of any matter is subject to the unpredictable risks inherent in the litigation process, CLPWC understands that MacDonald Illig has made no promises or guarantees concerning the outcome of this matter and cannot do so, and nothing in this letter shall be construed as such a promise or guarantee.

MacDonald Illig statements for professional services will be based upon the Firm's hourly rates for those lawyers and other Firm personnel who perform services on behalf of CLPWC. My hourly rate for this matter is \$345.00 per hour, which will remain in effect throughout 2023. Attached is our Fee Schedule through 2023.

June 20, 2023

Page -2-

I will assume primary responsibility for representing you in this matter and am a Senior Partner at MacDonald Illig. I may staff this matter with other attorneys, as I deem appropriate within my discretion, based on their levels of experience and areas of expertise, but I will supervise all legal work by them.

These hourly rates are reviewed on an annual basis due to the costs of doing business and are subject to increase, effective January 1, 2024. Unless notified in writing to the contrary, MacDonald Illig will assume that the CLPWC wants us to continue to represent them after we notify them of any such rate change, and all work performed after the effective date of any rate change will be billed at the new hourly rate.

The hourly rates do not include certain out-of-pocket costs which may be incurred by MacDonald Illig. In addition to hourly rates for professional services, MacDonald Illig will bill you for disbursements and other charges, including, but not limited to, filing fees, court reporter and expert witness fees, deposition costs, sheriff's costs, overnight delivery, courier services, postage, photocopying, reasonable business travel expenses and business meals.

It is MacDonald Illig's practice to render statements for professional services and related charges on a monthly basis, and we expect payment to be made within 30 days without regard to the status of this matter or the outcome of the negotiations. In the event that these statements are not timely paid, MacDonald Illig reserves the right to suspend services until satisfactory payment arrangements are made or, if necessary, to terminate its services. MacDonald Illig also reserves the right to immediately terminate services for lack of cooperation by the CLPWC. CLPWC, of course, may terminate our services at any time. Interest at the rate of 1% per month (12% annually) will be charged on all outstanding balances owed to us that are more than 45 days old.

CLPWC may terminate our legal representation at any time for any reason by notifying us in writing to do so. Upon our receipt of the notice to terminate our representation, we would cease all legal work immediately. CLPWC would be responsible for paying all legal fees, expenses and disbursements incurred until written notice of such termination is received by our law firm.

To the extent permitted or required by the rules of professional responsibility, rules of Court and/or applicable law, we may terminate our representation of CLPWC at any time fail to promptly pay our invoices, or if there would exist, at any time, any fact or circumstance that would, in our opinion, render our continuing representation unlawful, unethical, or otherwise inappropriate.

MacDonald Illig will keep CLPWC and you as their representative, informed regarding the status of any matters covered by this letter. As appropriate, we would expect to send you as the representative for CLPWC, copies of significant papers prepared or received by us. If you have any questions about our services or the status of any matter, please feel free to contact me at any time.

June 20, 2023  
Page -3-

At the conclusion of any matter, we will retain the CLPWC legal files for that matter for a period of five (5) years after we close our file. At the expiration of the five-year period, we will destroy these files **unless you notify us in writing that you wish to take possession of them.** We reserve the right to charge administrative fees and costs associated with researching, retrieving, copying, and delivering such files.

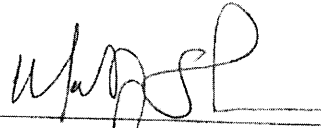
If you have any questions or if the terms of this engagement letter are not acceptable in any respect, please contact me at (814) 870-7607 so that we may discuss your questions or concerns. Otherwise, please sign a copy of this emailed engagement letter on behalf of your company, scan it and return same to me as soon as possible. You are also being sent an original letter via U.S. Mail. When you receive that, also please sign it and return to me in the self-addressed stamped envelope provided.

Thank you for permitting us to be of service.

Very truly yours,

MacDONALD, ILLIG, JONES & BRITTON LLP

By \_\_\_\_\_



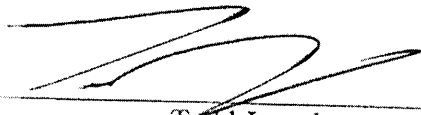
Mark J. Shaw

MJS/lmf/1827216.1  
Enclosure

June 20, 2023  
Page -4-

Intending to be legally bound hereby, I, on behalf of Conneaut Lake Park Water Corporation, acknowledge receipt of a copy of this engagement letter and agree to the terms set forth therein.

10-9-23  
Date

  
\_\_\_\_\_  
Todd Joseph  
Owner, Conneaut Lake Park Water Corp

MacDonald, Illig, Jones & Britton LLP  
Schedule  
Effective 01/01/2023- 12/31/2023

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Senior Partners	\$ 345.00 Per Hour
Partners	\$ 325.00 Per Hour
Associates	
a. More Than Five Years	\$ 295.00 Per Hour
b. Fourth and Fifth Years	\$ 285.00 Per Hour
c. Second and Third Years	\$ 265.00 Per Hour
d. First Year	\$ 245.00 Per Hour
Senior Paralegal	\$ 185.00 Per Hour
Paralegals and Law Clerks	\$ 165.00 Per Hour

INVOICE

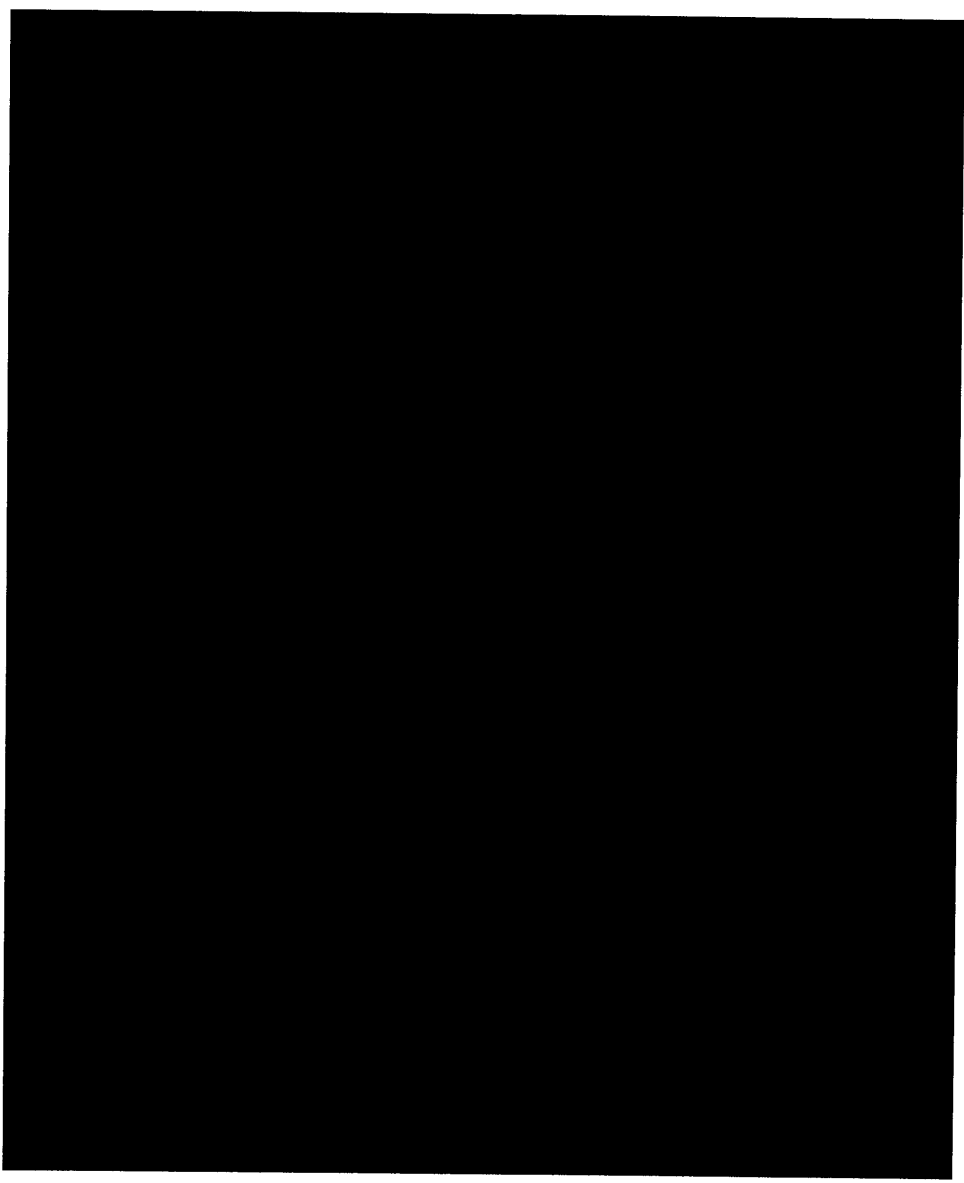
Conneaut Lake Park Water Corp.  
tjosephproperties@hotmail.com

September 15, 2023  
Invoice 593105  
Page 1

Our File # 60642.0000  
PUC Rate Case

For Services Through August 31, 2023

06/20/23  
06/30/23  
07/05/23  
07/12/23  
07/19/23  
07/21/23  
07/21/23  
07/21/23  
07/24/23





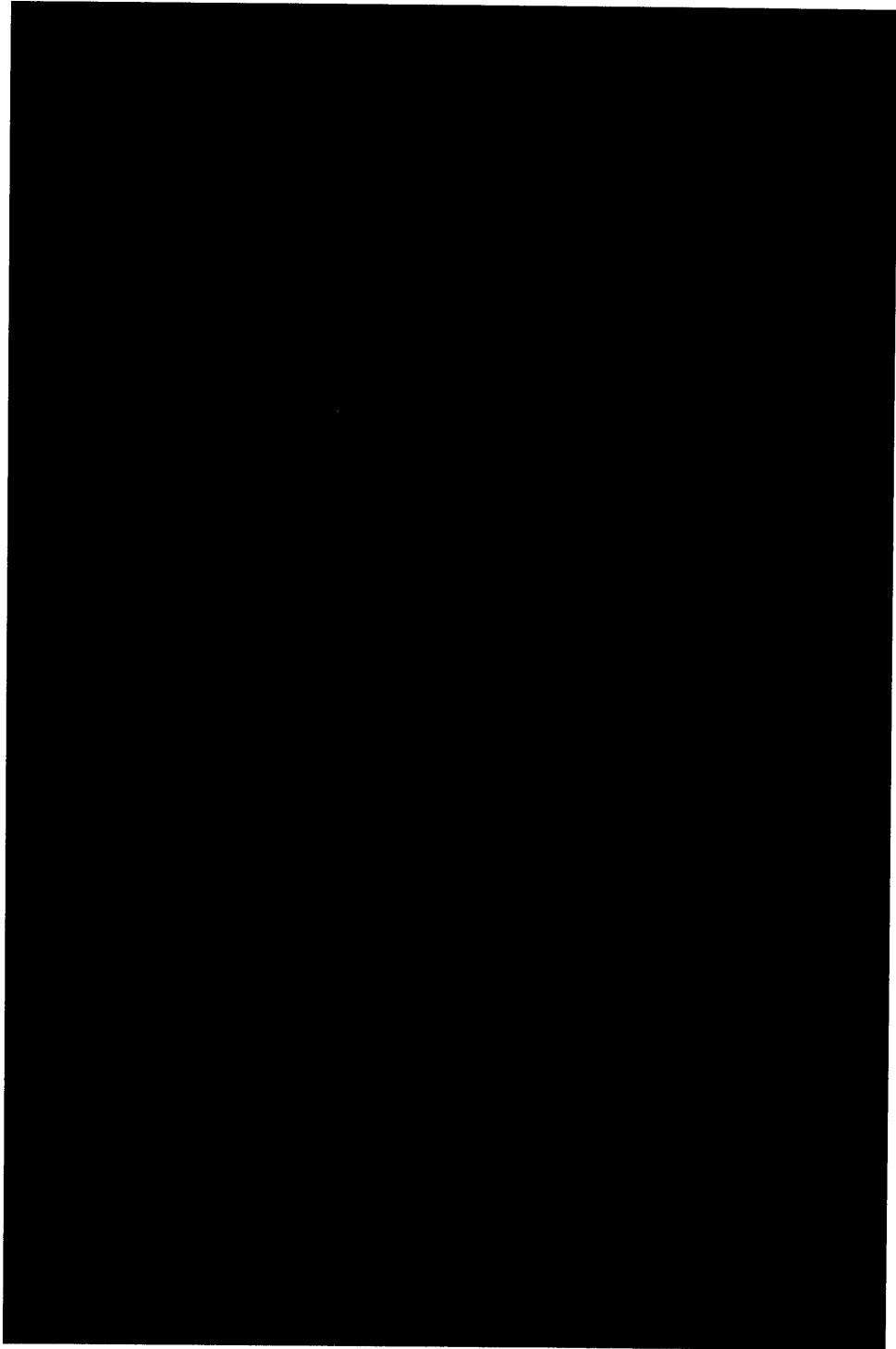
MACDONALD  
ILLIG ATTORNEYS

MACDONALD ILLIG JONES & BRITTON LLP  
100 STATE STREET • SUITE 700  
ERIE, PA 16507-1459  
OFFICE: 814-870-7600  
MACDONALDILLIG.COM  
TAX I.D. No. 25-0918810

Conneaut Lake Park Water Corp.  
tjosephproperties@hotmail.com

September 15, 2023  
Invoice 593105  
Page 2

07/28/23  
08/02/23  
08/03/23  
08/14/23  
08/14/23  
08/16/23  
08/17/23  
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08/17/23  
08/20/23  
08/24/23  
08/25/23



Conneaut Lake Park Water Corp.  
tjosephproperties@hotmail.com

September 15, 2023  
Invoice 593105  
Page 3

08/25/23

08/28/23

08/28/23

08/28/23

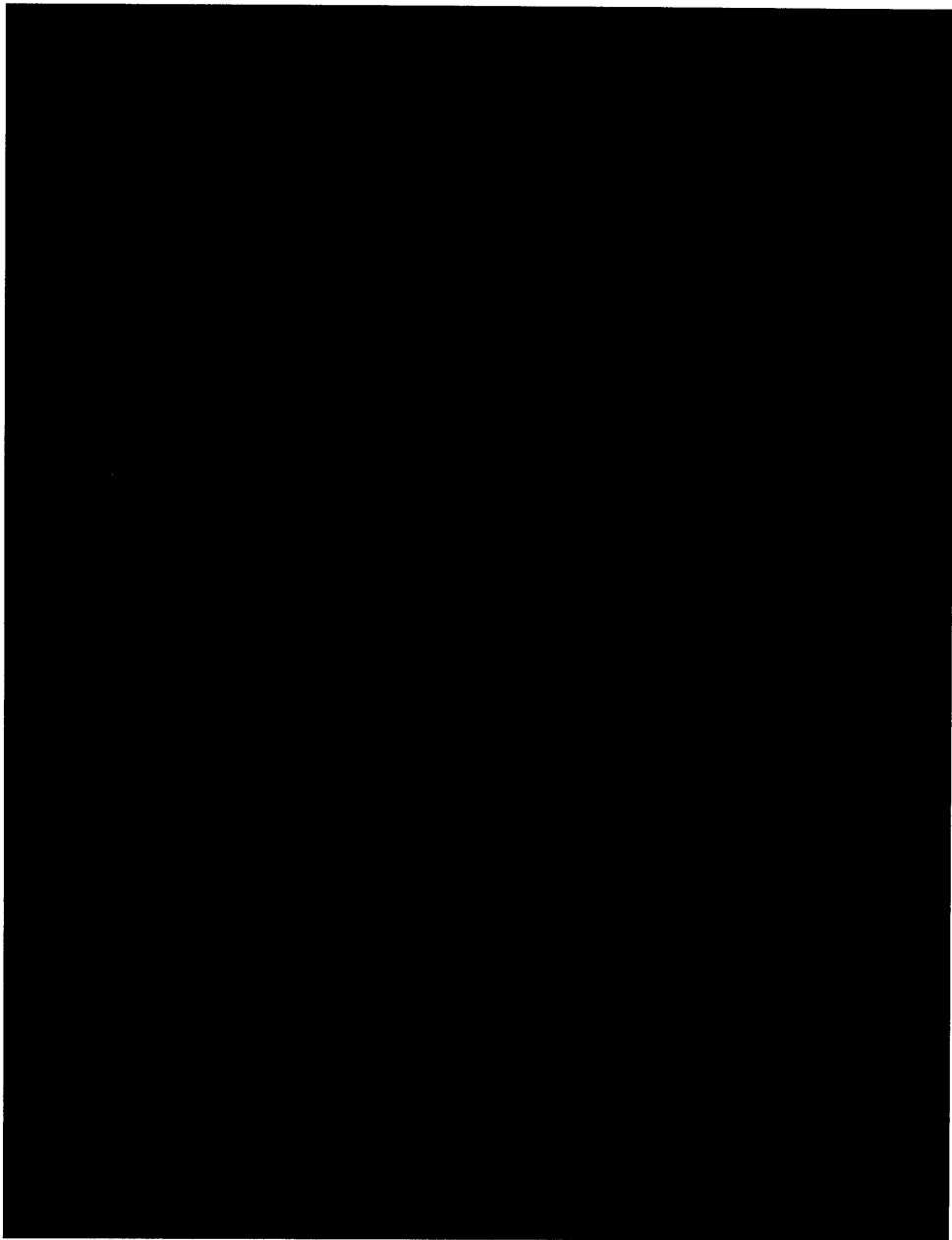
08/28/23

08/29/23

08/29/23

08/30/23

08/31/23



BILLING SUMMARY

Hours

Rate/Hr

Dollars

**MACDONALD  
ILLIG** ATTORNEYS

MACDONALD ILLIG JONES & BRITTON LLP  
100 STATE STREET • SUITE 700  
ERIE, PA 16507-1459  
OFFICE: 814-870-7600  
MACDONALDILLIG.COM  
TAX I.D. No. 25-0918810

Conneaut Lake Park Water Corp.  
tjosephproperties@hotmail.com

September 15, 2023  
Invoice 593105  
Page 4

M. J. Shaw	27.80	345.00	9,591.00
K. T. Olon	11.00	265.00	2,915.00
TOTAL	38.80		\$12,506.00

Fees for legal services \$12,506.00

Reimbursable Costs

Notice of proposed Rate Changes - Mailings (146)	91.98
Petition Service - Mailings (146)	267.18
Online Research	98.97
Document Reproduction	356.85

Total reimbursable costs \$814.98

**Net current billing for this invoice** \$13,320.98

\*\*\*\*\* PAYMENT DUE UPON RECEIPT \*\*\*\*\*

**Please make checks payable to "MacDonald Illig"  
and include our invoice number.**

**BUREAU OF INVESTIGATION AND ENFORCEMENT DATA REQUESTS**

**CONNEAUT LAKE PARK WATER CORPORATION, INC.**

**Docket No. R-2023-3041575**

**Analyst: Zac Walker**

**I&E-RE-13-D** Reference Conneaut Lake Park Water Corporation, Inc. filing, Statement of Reasons for Proposed Rate Increase, p. 4, Measures of Value. Provide the following:

- A. State whether the amount claimed for cash working capital is included in the amount claimed for net utility plant of \$1,455,505 as shown on Schedule B.
- B. If the response to Part A is yes, provide a breakdown that shows the cash working capital claim for December 31, 2022.
- C. The breakdown for total claimed rate base including the amount forecasted for cash working capital in the future test year ending December 31, 2023 (FTY).
- D. State the method Conneaut Lake Park Water Corporation, Inc. used determine the amount claimed for cash working capital and provide the calculation for both years ended December 31, 2022, and December 31, 2023.

**RESPONSE:**

- A. An amount claimed for cash working capital is not included in the net utility plant in service of \$1,455,505 as shown on Schedule B.
- B. Not applicable.
- C. Please reference Schedule E. There was no amount forecasted for cash working capital in the future test year ending December 31, 2023.
- D. Not applicable.

Responsible Witness: C. Heppenstall

Date: 10-10-23

**BUREAU OF INVESTIGATION AND ENFORCEMENT DATA REQUESTS**

**CONNEAUT LAKE PARK WATER CORPORATION, INC.**

**Docket No. R-2023-3041575**

**Analyst: Zac Walker**

**I&E-RE-14-D** Regarding Conneaut Lake Park Water Corporation, Inc.'s audits/reviews:

- A. Provide a list of all audits, performed by either internal or by external parties, that were conducted during the past 36 months, identifying the entity that conducted the audit, the type of audit/review, the operational period covered by the audit, recommendations made in the audit/review, and the status of changes to be addressed.
- B. Provide a complete list of all audits/reviews currently active, the status of such audits, and the estimated audit report dates.
- C. Provide a copy of the Company's most current audited financial statements and annual report.

**RESPONSE:**

- A. None
- B. None
- C. None

Responsible Witness: T. Joseph  
Date: 10-10-23

**BUREAU OF INVESTIGATION AND ENFORCEMENT DATA REQUESTS**

**CONNEAUT LAKE PARK WATER CORPORATION, INC.**

**Docket No. R-2023-3041575**

**Analyst: Zac Walker**

**I&E-RE-15-D** Reference Conneaut Lake Park Water Corporation, Inc. filing, Schedule D, Statements of Income. Provide details by year identifying the account name, the payee(s) and the expense amount claimed in the HTY and forecasted in the FTY for any of the following claims:

- A. Fines and penalties;
- B. Bank charges;
- C. Membership dues and subscriptions;
- D. Company sponsorships;
- E. Lobbying expenses; and
- F. Charitable contributions.

**RESPONSE:**

A. - E. The Company is not claiming any of the fine and penalties, bank charges, membership dues and subscriptions, company sponsorships, lobbying expenses, and charitable contribution expenses in the HTY or forecasted FTY.

Responsible Witness: C. Heppenstall

Date: 10-10-23

BUREAU OF INVESTIGATION AND ENFORCEMENT DATA REQUESTS

CONNEAUT LAKE PARK WATER CORPORATION, INC.

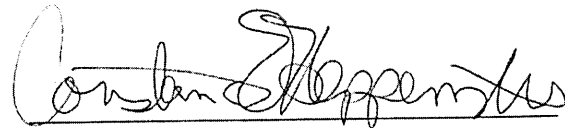
Docket No. R-2023-3041575

Analyst: Zac Walker

VERIFICATION

I, Constance Heppenstall, hereby state that the averments set forth in the foregoing Responses Nos. 1-7, 1013 and 15 to IE Data Requests Set RE (Nos. 1D-15D) - Walker, 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: 10-10-23

A handwritten signature in cursive script, appearing to read "Constance Heppenstall", written over a horizontal line.

**BUREAU OF INVESTIGATION AND ENFORCEMENT DATA REQUESTS**

**CONNEAUT LAKE PARK WATER CORPORATION, INC.**

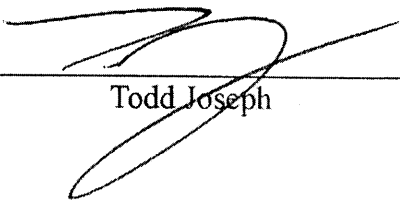
**Docket No. R-2023-3041575**

**Analyst: Zac Walker**

**VERIFICATION**

I, Todd Joseph, hereby state that the averments set forth in the foregoing Responses Nos. 1, 5, 7-10, and 14 to RE Data Requests Set RE (Nos. 1D-15D) - Walker, 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: 10-10-23

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