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October 12, 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 RS (Nos. 1-D through 6-D) - Walker at Docket No. R-2023-3041575.

Very truly yours,

MacDONALD, ILLIG, JONES & BRITTON LLP

By _____



Mark J. Shaw

MJS/exm/1828149.1
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
choover@paoca.org
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

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
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

Respectfully submitted,



Mark J. Shaw, Esq.
MacDONALD, ILLIG, JONES & BRITTON LLP
100 State Street, Suite 700
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-RS-1-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 C, Statements of Revenues; and
- B. Conneaut Lake Park Water Corporation, Inc. filing, Schedule C, Bill Analysis.

RESPONSE:

This is being provided in electronic format under separate cover.
Attached is a hard copy of each.

Responsible Witness: C. Heppenstall

Date: 10-12-23

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

Statements of Revenues

CUSTOMER CLASS	Number of Customers for the Test Year Ended 12/31/2022		Actual Revenues for the Year Ended mm/dd		Annualization adjustments	Totals as Annualized (6=5+4)	Proposed Increase (7)	Totals after Increase (8=6+7)
	Beginning of year	End of year	12/31/2022	Test Year 12/31/2022				
	(1)	(2)	(3)	(4)				
Metered Sales:								
461.1 Residential						\$ -		\$ -
461.2 Commercial						\$ -		\$ -
461.3 Industrial						\$ -		\$ -
461.6 Other						\$ -		\$ -
SUB-TOTAL	0	0	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Unmetered Sales:								
460.1 Residential - Year-Around	90.00	94.00	\$ 15,543	\$ 15,543	\$ (345)	\$ 15,198	\$ 116,886	\$ 132,084
460.1 Residential - Seasonal	72.00	68.00	\$ 6,221	\$ 6,221	\$ (346)	\$ 5,875	\$ 99,792	\$ 105,667
460.2 Commercial - Customer 1	1.00	1.00	\$ 1,200	\$ 1,200	\$ 1,200	\$ 2,400	\$ 18,000	\$ 20,400
460.2 Commercial - Customer 2	1.00	1.00	\$ 3,082	\$ 3,082		\$ 3,082	\$ 23,119	\$ 26,201
468.0 Other						\$ -		\$ -
SUB-TOTAL	164.00	164.00	\$ 26,046	\$ 26,046	\$ 509	\$ 26,555	\$ 257,797	\$ 284,352
470.0 Penalties and Forfeitures			\$ -	\$ -		\$ -	\$ -	\$ -
474.0 Other Revenue						\$ -		\$ -
TOTAL REVENUE			\$ 26,046	\$ 26,046	\$ 509	\$ 26,555	\$ 257,797	\$ 284,352

CONNEAUT LAKE PARK WATER CORPORATION

BILL ANALYSIS
APPLICATION OF PRESENT RATES AND PROPOSED RATES TO CONSUMPTION ANALYSIS
YEAR ENDED DECEMBER 31, 2022 and 2023

Rate Block CCF (1)	Billing Determinants as of 12/31/2022			Billing Determinants as of 12/31/2023			Monthly Number Of Bills (8)	Proposed Consumption (9)	Proposed Monthly Rate (10)	Proposed Revenue (11)
	Number Of Bills (2)	Present Annual Rate (3)	Revenue (4)	Number Of Bills (5)	Present Annual Rate (6)	Revenue (7)				
<u>Residential - Annually/Monthly</u>										
Flat Rate - Year-Around Resident	90	\$ 172.70	\$ 15,543	88	\$ 172.70	\$ 15,198				
Flat Rate - Seasonal Resident	72	86.40	6,221	68	86.40	5,875				
Total Residential										
Flat Rate - Year-Around Resident							1,080		\$ 122.30	\$ 132,084
Flat Rate - Seasonal Resident							864		122.30	105,667
Total Residential	162		\$ 21,764	156		\$ 21,073	1,944			\$ 237,751
<u>Commercial - Annually/Monthly</u>										
<u>Flat Rate</u>										
Flat Rate 3	1	\$ 1,200.00	\$ 1,200	2	\$ 1,200.00	\$ 2,400				
Flat Rate 4	1	3,082.40	3,082	1	3,082.40	3,082				
Commercial Flat Rate							-		\$ 850.00	\$ -
<u>Minimum Rate</u>										
Small Commercial (4,500 gallons per month)							24		\$ 850.00	20,400
Large Commercial (18,000 gallons per month)							12		\$ 2,183.40	26,201
Consumption above the Minimum (Per 100 gallons)								-	\$ 10.00	-
Total Commercial	2		\$ 4,282	3		\$ 5,482	36			\$ 46,601
Total	164		\$ 26,046	159		\$ 26,555	1,980			\$ 284,352

	Increase	
Res	8.50	\$ 14.39
Comm	8.50	\$ 7.20

BUREAU OF INVESTIGATION AND ENFORCEMENT DATA REQUESTS

CONNEAUT LAKE PARK WATER CORPORATION, INC.

Docket No. R-2023-3041575

Analyst: Zac Walker

I&E-RS-2-D Reference Conneaut Lake Park Water Corporation, Inc. filing Schedule C, Bill Analysis, that shows the number of customers by rate class. Provide the number of customers on a monthly basis from January 1, 2020, through August 31, 2023.

RESPONSE:

The Company has not tracked the number of customers by rate class by month during the time period referenced. It is the Company's belief that the number of customers per class per month has not changed significantly over time. The Company is aware that the number of customers have decreased since the prior operator due to properties being acquired and the buildings on those properties being demolished.

Responsible Witness: T. Joseph

Date: 10-12-23

BUREAU OF INVESTIGATION AND ENFORCEMENT DATA REQUESTS

CONNEAUT LAKE PARK WATER CORPORATION, INC.

Docket No. R-2023-3041575

Analyst: Zac Walker

I&E-RS-3-D Reference Conneaut Lake Park Water Corporation, Inc. filing Schedule C, Bill Analysis, that shows the number of customers by rate class. Provide the projected number of customers on a monthly basis from September 1, 2023, through December 31, 2023.

RESPONSE: The Company does not anticipate there being any new customers during the period between September 1, 2023, through December 31, 2023.

Responsible Witness: T. Joseph
Date: 10-12-23

BUREAU OF INVESTIGATION AND ENFORCEMENT DATA REQUESTS

CONNEAUT LAKE PARK WATER CORPORATION, INC.

Docket No. R-2023-3041575

Analyst: Zac Walker

I&E-RS-4-D Reference Conneaut Lake Park Water Corporation, Inc. filing concerning customer billing. State whether the annual rate is pro-rated based on when a new customer begins service or an existing customer terminates service.

RESPONSE: The Tariff allows for billing to be either quarterly or monthly at the discretion of the Company. The Company policy is that the customer only pays for the period of time for which they are receiving service. Accordingly, if service is started or terminated at some date within a billing period, they will be billed only for the period of time in that billing period for which they were receiving service.

Responsible Witness: T. Joseph

Date: 10/12/23

BUREAU OF INVESTIGATION AND ENFORCEMENT DATA REQUESTS

CONNEAUT LAKE PARK WATER CORPORATION, INC.

Docket No. R-2023-3041575

Analyst: Zac Walker

I&E-RS-5-D Reference Conneaut Lake Park Water Corporation, Inc. filing, Statement of Reasons, p. 3, concerning customer count changes. State whether there are new residential properties or businesses known for the FTY. If yes, provide the number of each added, or expected to be added in 2023.

RESPONSE: No new residential properties or businesses are known for the FTY.

Responsible Witness: T. Joseph

Date: 10-12-23

BUREAU OF INVESTIGATION AND ENFORCEMENT DATA REQUESTS

CONNEAUT LAKE PARK WATER CORPORATION, INC.

Docket No. R-2023-3041575

Analyst: Zac Walker

I&E-RS-6-D Reference Conneaut Lake Park Water Corporation, Inc.'s response to TUS Data Request Set 1, R-5, concerning the ten private fire hydrants served by Conneaut Lake Park Water Corporation, Inc. State the amount currently charged to, or proposed to be charged to, the private fire hydrants.

RESPONSE: There is no amount currently charged for the private fire hydrants and no amount is proposed to be charged for the private fire hydrants. The private fire hydrants are not dedicated to a particular customer within the service area of the Company but are available for community use in case of fire.

Responsible Witness: T. Joseph

Date: 10-12-23

BUREAU OF INVESTIGATION AND ENFORCEMENT DATA REQUESTS
CONNEAUT LAKE PARK WATER CORPORATION, INC.

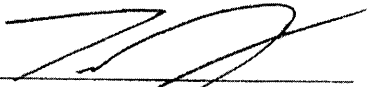
Docket No. R-2023-3041575

Analyst: Zac Walker

VERIFICATION

I, Todd Joseph, hereby state that the averments set forth in the foregoing Responses Nos. 2-6 to IE Data Request Set RS (Nos. 1D-6D) - 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: 10-11-23



Todd Joseph

BUREAU OF INVESTIGATION AND ENFORCEMENT DATA REQUESTS
CONNEAUT LAKE PARK WATER CORPORATION, INC.

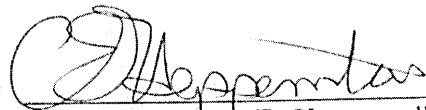
Docket No. R-2023-3041575

Analyst: Zac Walker

VERIFICATION

I, Constance E. Heppenstall, hereby state that the averments set forth in the foregoing Responses No. 1 to IE Data Requests Set RS (Nos. 1D-6D) - 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: October 12, 2023


Constance E. Heppenstall