

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

October 19, 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

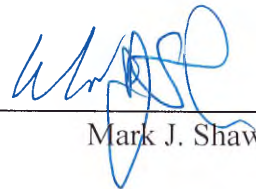
Dear Secretary Chiavetta:

Attached please find Responses to Bureau of Investigation and Enforcement's (I&E) Data Requests Set RE (Nos. 16-D through 22-D) - Walker at Docket No. R-2023-3041575.

Very truly yours,

MacDONALD, ILLIG, JONES & BRITTON LLP

By _____



Mark J. Shaw

MJS/exm/lmf/1828144.1
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

Christine Hoover
Harrison W. Breitman
Office of Consumer Advocate
555 Walnut Street, 5th Floor
Harrisburg, PA 17101-1923
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

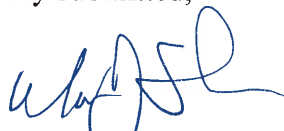
Via Electronic Mail

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-RE-16-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, for the \$24,000 incurred in the year ended December 31, 2021.

RESPONSE:

The operator expenses according to the agreement with the operator is \$24,000 per year. Please note that the Company did not obtain its Certificate of Public Convenience until April 20, 2023. A copy of the Agreement was provided in Response to I&E-RE-5-D.

Responsible Witness: Todd Joseph
Date: 10-19-23

BUREAU OF INVESTIGATION AND ENFORCEMENT DATA REQUESTS

CONNEAUT LAKE PARK WATER CORPORATION, INC.

Docket No. R-2023-3041575

Analyst: Zac Walker

I&E-RE-17-D Reference Conneaut Lake Park Water Corporation, Inc. filing Schedule D, Statements of Income, concerning General Office Expenses. Provide a detailed breakdown with supporting documentation, including all workpapers, receipts, and/or invoices, for the \$3,500 incurred in the year ended December 31, 2021.

RESPONSE:

The Company does not have a breakdown of General Office Expenses for 2021. Please note that the Company did not obtain its Certificate of Public Convenience until April 20, 2023.

Responsible Witness: Todd Joseph

Date: 10-19-23

BUREAU OF INVESTIGATION AND ENFORCEMENT DATA REQUESTS

CONNEAUT LAKE PARK WATER CORPORATION, INC.

Docket No. R-2023-3041575

Analyst: Zac Walker

I&E-RE-18-D Reference Conneaut Lake Park Water Corporation, Inc. filing Schedule D, Statements of Income, concerning purchased power expenses attributed to the Garage and George Street locations:

- A. Provide copies of the monthly Penelec electric bills from January 1, 2021, through August 31, 2022.
- B. Identify the amount due for each billing period from January 1, 2021, through August 31, 2022.
- C. Identify the late payment charges for each billing period from January 1, 2021, through August 31, 2022.
- D. Identify the balance at billing prior to the current charges billed for each billing period from January 1, 2021, through August 31, 2022.
- E. Provide proof of payment for each billing period from January 1, 2021, through August 31, 2022.

RESPONSE:

The Company only has copies of Penelec bills dating back to September 2022 for the billing period of August 19 to September 19, 2022.. Please note that the Company did not obtain its Certificate of Public Convenience until April 20, 2023. The invoice from the billing period of September 20 to October 18, 2022 for the George Street meter shows a balance due of \$0.00 as of 10/21/22. The invoice from the billing period of September 20 to October 18, 2022 for the Garage meter shows a balance due of \$0.00 as of 10/21/2022.

Responsible Witness: Todd Joseph

Date: 10-19-23

BUREAU OF INVESTIGATION AND ENFORCEMENT DATA REQUESTS

CONNEAUT LAKE PARK WATER CORPORATION, INC.

Docket No. R-2023-3041575

Analyst: Zac Walker

- I&E-RE-19-D** Reference Conneaut Lake Park Water Corporation, Inc.'s response to TUS Data Request Set 1, R-6, concerning purchased power expenses attributed to CLP Camperland LLC:
- A. Provide copies of the monthly Penelec electric bills from January 1, 2021, through August 19, 2023.
 - B. Identify the late payment charges for each billing period from January 1, 2021, through August 19, 2023.
 - C. Identify the balance at billing prior to the current charges billed for each billing period from January 1, 2021, through August 19, 2023.
 - D. Provide proof of payment for each billing period from January 1, 2021, through August 19, 2023.
 - E. State whether the KWH usage is correct as depicted for the March 20, 2023 (20 KWH) billing period, the February 16, 2023 (2 KWH) billing period, the January 18, 2023 (3 KWH) billing period, and the December 17, 2022 (3 KWH) billing period.

RESPONSE:

A. - E. After further review and investigation, the Company is withdrawing these expenses from its rate filing.

Responsible Witness: T. Joseph

Date: 10-19-23

BUREAU OF INVESTIGATION AND ENFORCEMENT DATA REQUESTS

CONNEAUT LAKE PARK WATER CORPORATION, INC.

Docket No. R-2023-3041575

Analyst: Zac Walker

I&E-RE-20-D Reference Conneaut Lake Park Water Corporation, Inc.'s response to TUS Data Request Set 1, R-6, concerning purchased power expenses:

- A. Explain in detail why it is appropriate to include late payment charges in purchased power expenses for ratemaking purposes.
- B. Provide proof of payment for the August 22, 2023 electric bill that was billed to the Garage location.
- C. Provide proof of payment for the June 20, 2023, July 21, 2023, and August 22, 2023 electric bills that were billed to the George Street location.

RESPONSE:

- A. As answered in TUS Data Request Set 1, R-7, the amount being claimed for purchased power expense is less than the sum of the purchased power bills by several thousand dollars (See TUS Data Request Set 1, R-6, \$38,550.31 cost compared to \$23,000 claimed). Thus, the late payments, which for the last year totaled \$384 would be irrelevant for purposes of this rate case.
- B. See attached.
- C. See attached.

Responsible Witness: C. Heppenstall
Date: 10-19-23

BUREAU OF INVESTIGATION AND ENFORCEMENT DATA REQUESTS

CONNEAUT LAKE PARK WATER CORPORATION, INC.

Docket No. R-2023-3041575

Analyst: Zac Walker

I&E-RE-21-D Explain in detail why the following locations are necessary to provide safe, reliable water service:

- A. The Garage located on Reed Avenue; and
- B. The George Street location.

RESPONSE:

- A. The Garage electric meter location on Reed Street is associated with the water tower and its controls.
- B. The George Street electric meter location is where the treatment plant and water wells are located.

Responsible Witness: T. Joseph
Date: 10-19-23

BUREAU OF INVESTIGATION AND ENFORCEMENT DATA REQUESTS

CONNEAUT LAKE PARK WATER CORPORATION, INC.

Docket No. R-2023-3041575

Analyst: Zac Walker

I&E-RE-22-D Reference Conneaut Lake Park Water Corporation, Inc.'s responses to TUS Data Request Set 1, R-6 and R-25, concerning purchased power expenses and commercial customers. Explain in detail why it is appropriate to include electric bills designated to a commercial customer, Camperland, in the purchased power expenses claimed for ratemaking purposes.

RESPONSE:

After further review and investigation, the Company is withdrawing these expenses from its rate filing. Please note that this does not impact the Company's overall rate request as even without the expenses from Camperland, the amount incurred at the other locations totals \$25,280, while the Company was only claiming \$23,000 of expenses to supports its rate request.

Responsible Witness: Todd Joseph/Connie Heppenstall
Date: 10-19-23

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. 16-19 and 21-22 to IE Data Request Set RE (Nos. 16D-22D) - 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: 10-16-23

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, Connie Heppenstall, hereby state that the averments set forth in the foregoing Responses Nos. 20 and 22 to IE Data Requests Set RE (Nos. 16D-22D) - 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: 10-16-23

My Account


- Pay My Bill
- Billing & Payment History
- Billing & Payment Options
- Manage My Account
- Text & Email Alerts
- Usage History
- Submit Meter Reading
- Analyze Usage
- Supplier Choice
- Time-of-Use Pricing

My Account

Welcome, Todd Joseph

*4097, GARAGE

Pay With Direct Debit [X]

 Have your bill paid on time automatically each month without having to think about it. Our Direct Debit Payment Plan lets you set it and forget it.

ENROLL

100144504097
REED AVE
GARAGE
CONNEAUT LAKE PA 16316

✔ Account is up to date

AMOUNT DUE

\$0.00

Due 10/6/2023

PAY MY BILL

My Account


- Pay My Bill
- Billing & Payment History
- Billing & Payment Options
- Manage My Account
- Text & Email Alerts
- Usage History
- Submit Meter Reading
- Analyze Usage
- Supplier Choice
- Time-of-Use Pricing

My Account

Welcome, Todd Joseph

*1671, GEORGE ST

Pay With Direct Debit [X]

 Have your bill paid on time automatically each month without having to think about it. Our Direct Debit Payment Plan lets you set it and forget it.

ENROLL

100144501671
GEORGE ST
CONNEAUT LAKE PA 16316

✔ Account is up to date

AMOUNT DUE

\$0.00

Due 10/6/2023

PAY MY BILL



Chat

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. 16-19 and 21-22 to IE Data Request Set RE (Nos. 16D-22D) - 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: 10-16-23

DocuSigned by:



6A20AA5408754A8...

Todd Joseph

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

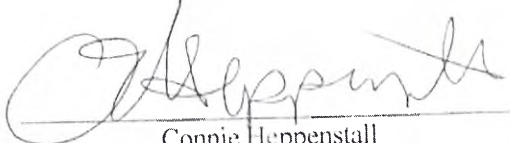
Docket No. R-2023-3041575

Analyst: Zac Walker

VERIFICATION

I, Connie Heppenstall, hereby state that the averments set forth in the foregoing Responses Nos. 20 and 22 to IE Data Requests Set RE (Nos. 16D-22D) - 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: 10-16-23



Connie Heppenstall