

A-2019-3007513

**Response Letter from Pete Steffen, Resort Engineer at  
Club Exploria/Pocono Mountain Villas to  
Rosemary Chiavetta, Secretary of PAPUC  
dated November 16, 2023 with attachments**

DATE OF DEPOSIT

NOV 30 2023

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Club Exploria LLC  
Pocono Mountain Villas  
PO Box 447, RT 209  
Bushkill, PA 18324

November 29, 2023

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

DATE OF DEPOSIT

NOV 30 2023

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**Docket No. A-2019-3007513**

**Utility Code 1721803**

**RE: Request to be Removed from the Act 127 Operator Registry**

Secretary Chiavetta,

Within your correspondence dated November 16, 2023, there were 6 Data Requests at the end of your letter. Please see responses associated with each request, along with noted supporting documentation where applicable.

***Request #1 Please confirm that all of the actions mentioned in Club Exploria's March 24, 2023 letter to Commission have been completed and explain any additional steps Club Exploria has taken to become non-jurisdictional and exempt from complying with Act 127.***

I can confirm that the actions mentioned in letter of March 24, 2023 have all been completed. Please see attachment, "E mail to Jim Harchar 031523". As invited to do so in the letter, Jim Harchar, I believe it was Friday, March 24, 2023, when a site visit was conducted by Jim Harchar, Ryan Zaffino, and Mike Chilek, of the PUC, to verify the work was completed. It was at that time that Mike Chilek noted a Dashboard Card Notification allowing a vehicle to be parked on our Private Property where the general public is not allowed. Also, at that time a broken sign or sign in disrepair, related to ours being a private community, was noted. At that time, I told the gentlemen I would have it repaired and documented to you. Please see attachment, "E Mail to Jim Harchar 033123".

***Request #2 Please provide the Act 127 Annual registration to the Commission ASAP. Alternatively, please provide the date this was filed with the Commission and the tracking information.***

Please see attachment "Act 127 Registration Form Adjusted 112223" filed from Florida office 112923

***Request #3 Please provide documentation or citations supporting Club Exploria's assertions that it would be exempt from the Commission regulations.***

From Docket Number 15283 of the Propane Education and Research Council, located at 1140 Connecticut Avenue NW Suite 1075 Washington DC 20036. Titled "Propane Jurisdictional Systems A Guide to Understanding Basic Fundamentals and Requirements.

Page 2 Common Terms Jurisdictional System, "**...when the system is not entirely on the customer's premises and a portion of the system is in a public place.**" All of the infrastructure associated with our propane is 100% on our own private property. Also, on page 2 of the publication it defines a Public Place, "**A place that is generally open to all persons in a community as opposed to being restricted to specific person**". We are 100% a private community, members only. Our basketball courts are even locked for members only. See again previous attachment indicating "Private Community".

Page 4 Defining a Jurisdictional System; Condition 1: Multiple Customers (10+ supplied from a single source). Our entire system has been reworked in 2023 whereby a single source serves no more than 8 of our own villas all owned 100% by Club Exploria. This condition does not apply.

Page 5 Condition 2: Multiple Customers, where a portion of the system is in a public place. This does not apply since we are not a public place.

Page 7 "When Is a System Non-Jurisdictional? A propane system is considered non-jurisdictional if it has fewer than 10 customers and no portion of the system is in a public place", Club Exploria has no customers. "Also it is considered non-jurisdictional if the system is located entirely on a single customer's premises (no matter if a portion is located in a public place)."

Continuing also on page 7, "A good example of non-jurisdictional system would be a single-family residence or a small condominium complex with fewer than 10 customers, if the condo association owns the roads within the complex or none of the propane lines cross public roads or rights-of-way (Example 1). Another good example would be a fast food restaurant where the propane tank(s) is on the customer's premises and the lines running under the driveway/parking area are also on the same customer premises. Because this is a single customer and the entire system is on the same customer premises, this entire system is non-jurisdictional (Example 2)." Club Exploria is the only "customer" here, we do not sell LP gas to anyone.

***Request #4 Please provide documentation from the U.S. Department of Transportation's Pipeline and hazardous Material Safety Administration (PHMSA) that clearly designates Club Exploria as non-jurisdictional and exempts Club Exploria from the mandates of Act 127.*** This is the relief we are seeking.

***Request #5 Please explain if any of Club Exploria's gas lines are in, or cross, any public areas.*** This has been documented as NO they do not exist in public areas.

**Request #6 Please explain the types of entities/customers that Club Exploria's gas lines provide service to. The villas in the area that have gas appliances are:**

2 Bedroom with Loft

1 bedroom

Studio

Sincerely,



Peter J. Steffen  
Club Exploria LLC  
Resort Engineer  
PO Box 447, RT 209  
Bushkill, PA 18324

**Attachment No. 1**

**\*Email to Jim Harchar dated March 15, 2023**

DATE OF DEPOSIT

NOV 30 2023

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

## Peter Steffen

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**From:** Peter Steffen  
**Sent:** Thursday, March 16, 2023 8:08 AM  
**To:** Harchar, Jim  
**Cc:** Zaffino, Ryan; Chad Lowry; John M Smith  
**Subject:** RE: [External] RE: O&M Manual

Hey Jim,

Absolutely let's get together

Peter Steffen | Maintenance Supervisor  
Pocono Mountain Villas by Exploria Resorts  
O: 570-588-6661 ext. 2312  
<https://www.exploriaresorts.com/>



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**From:** Harchar, Jim <jharchar@pa.gov>  
**Sent:** Wednesday, March 15, 2023 4:03 PM  
**To:** Peter Steffen <psteffen@exploriaresorts.com>  
**Cc:** Zaffino, Ryan <rzaffino@pa.gov>; Chad Lowry <clowry@exploriaresorts.com>; John M Smith <jsmith@exploriaresorts.com>  
**Subject:** RE: [External] RE: O&M Manual

Pete,

Thanks for providing this information.

I want to let you know that there are multiple different scenarios on how a company is jurisdictional to PHMSA Safety Regulations.

Attached is a document titled revised guidance operators small lp gas systems. This document has jurisdictional set ups which seem to me still reflect your system. Condition 2 on page iv is what I am referring to.

Also attached is a jurisdictional drawing which seems like it could be reflective of your system.

I just want to let you know that there is more jurisdictional set ups than just 10 customers off of one tank.

We can schedule a time to come review your system however and see what was completed.

Jim

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**From:** Peter Steffen <psteffen@exploriaresorts.com>  
**Sent:** Wednesday, March 15, 2023 8:39 AM  
**To:** Harchar, Jim <jharchar@pa.gov>  
**Cc:** Zaffino, Ryan <rzaffino@pa.gov>; Chad Lowry <clowry@exploriaresorts.com>; John M Smith

<jsmith@exploriaresorts.com>

Subject: [External] RE: O&M Manual

**ATTENTION:** This email message is from an external sender. Do not open links or attachments from unknown senders. To report suspicious email, use the Report Phishing button in Outlook.

Hi Jim,

Hope you are well, As far as the O&M manual goes there have been no upgrades or changes do you still want a copy? What has been done on our property is implementation of what was talked about last year, with yourself, Mike and Ryan, which is separating our system to the point we are no longer jurisdictional. This has been accomplished.

We have separated all of our multi-tank connections.

We have eliminated all interconnections of more than 8 Villa units on a system

We have set in place 5 additional tanks

We have several units that are no longer in service with no LP connectivity.

There are tanks that remain in the ground completely locked out and cut off from any pipe network

On the attached document you will see the old layout represented with yellow lines, this also shows all the interconnects, isolation valves, etc. The heavy black lines now show the system layout including the 5 new tanks placed, numbering 1-5. It then shows the route of the LP supply to the villas. No longer do we have the ability to supply one area with LP Supply from another, all interconnects are gone. Where the black lines end is where the LP service ends to those specific units.

Additionally Exploria Resorts will be getting out of the LP Gas purchase and self delivery business. We will be engaging the services of Heller's Gas to supply and deliver all necessary LP to our property. Exploria will continue to maintain the regulators and such to the villas.

We believe, at this point, and with the system changes we are longer a Pipeline Operator under Act 127. As part of being completely transparent I will file the annual registration, with all the system changes noted above, unless you advise it is not necessary to do so prior to March 31, 2023.

Jim, if it makes sense to you, feel free to come and meet with myself and John Smith and do a property tour. You can see the "scars" in the ground where tanks were added, lines eliminated, etc.

Looking forward to seeing you.

Regards,

**Peter Steffen** | Maintenance Supervisor  
**Pocono Mountain Villas by Exploria Resorts**  
O: 570-588-6661 ext. 2312  
<https://www.exploriaresorts.com/>



**From:** Harchar, Jim <jharchar@pa.gov>  
**Sent:** Tuesday, March 14, 2023 9:45 AM  
**To:** Peter Steffen <psteffen@exploriaresorts.com>

Cc: Zaffino, Ryan <[rzaffino@pa.gov](mailto:rzaffino@pa.gov)>

Subject: O&M Manual

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

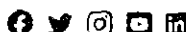
Hey Pete,

Would you be able to send me your most recent O&M manual?

Thanks,



[www.puc.pa.gov](http://www.puc.pa.gov)



Jim Harchar  
FUVE 3, Pipeline Safety  
Bureau of Investigation and  
Enforcement

Phone: 717-603-2350  
Email: [jharchar@pa.gov](mailto:jharchar@pa.gov)  
Consumer Hotline:  
1-800-692-7380

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## **Attachment No. 2**

**\*Email to Jim Harchar dated March 31, 2023**

DATE OF DEPOSIT

NOV 30 2023

PA PUBLIC UTILITY COMMISSION  
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## Peter Steffen

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**From:** Peter Steffen  
**Sent:** Friday, March 31, 2023 7:33 AM  
**To:** Harchar, Jim; Chilek, Michael; Zaffino, Ryan  
**Cc:** Chad Lowry  
**Subject:** Private Community Pics

Good Morning Gentlemen,

See pics below, as promised, of new replacement signage (first 2), and a pic of existing signage. All indicative of our private community status. Also you noticed our Dashboard Cards while we were up in Tree Tops further indicating the need to be an invited guest. You most likely saw that I did send the letter to Secretary Chiavetta. We are hopeful for a positive response.

Have a great day gentlemen.







Peter Steffen | Maintenance Supervisor  
**Pocono Mountain Villas by Exploria Resorts**  
O: 570-588-6661 ext. 2312  
<https://www.exploriaresorts.com/>



**Attachment No. 3**

**\*Copy of Act 127 Filing Submitted by Club Exploria  
Corporate Offices on November 29, 2023**

DATE OF DEPOSIT

NOV 30 2023

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU



Act 127  
Pennsylvania Pipeline Operator Annual Registration Form

Please submit completed form by March 31

Registration for Previous Calendar Year Ending: 2022

Docket Number:

If you need help getting your docket number,

- Go to [www.puc.pa.gov](http://www.puc.pa.gov) > Filing & Resources > Issues, Laws & Regulations > Act 127 (Pipeline Act).
- On the Act 127 page you will see a link on the lower section of the page under Pipeline Operators Registry.
- Click on the link to "View Current List of Registered Pipeline Operators."
- Click on the utility code next to your name; find the Docket Number (A-2012-xxxxxx) under the Docketed Cases.

1. Registrant (Full name of pipeline operator): Club Exploria LLC-Pocono Mountain Villas

Comments: If applicable, explain any changes to your company name or legal status (acquisition, merger, etc.) in the past calendar year.

2. Types of Pipelines and/or Facilities.

Please note that natural gas public utilities are not required to file this form.

Pipelines and/or facilities covered by this form are associated with the following types of facilities and transport the following types of commodities: (select all that apply)

Gas Distribution

Natural Gas

Propane Gas

Gas Transmission

Natural Gas

Propane Gas

Other Gas

Define:

Gas Gathering

Hazardous Liquid

Other

Define:

3. Main Mailing Address:

Provide the address to which the Commission will serve all correspondence relating to this registration.

Street Address/P. O. Box:

25 Town Center Blvd., Suite C

City, State, Zip Code:

Clermont, FL. 34714

4. Physical Address:

Provide the address of your primary Pennsylvania facility. This address is needed by the Commission to perform inspections and onsite visits.

Do not provide a post office box number.

Street Address:

1008 Sand Hill Road

City, State, Zip Code:

East Stroudsburg PA 18302

5. US DOT Operator ID Number:

Provide the number assigned to you by the United States Department of Transportation, Pipeline Hazardous and Materials Safety Administration (PHMSA).

350245

6. PA L&I Propane Registration Number:

Provide your propane registration number with the Pennsylvania Department of Labor and Industry (if applicable). If you do not have a number, please enter "N/A".

39902

|   |   |
|---|---|
| 7.  | <b>Regulatory Contact Information:</b><br><i>Complete in full with contact information of the person in your company the Commission can contact for questions and other matters pertaining to your registration and operations.</i>   |
|   | Name: Peter Steffen   |
|   | Street Address: 1008 Sand Hill Road   |
|   | City, State, Zip Code: East Stroudsburg PA  |
|   | Email Address: psteffen@exploriaresorts.com   |
|   | Telephone Number: (570) 588-6661  |
| 8.  | <b>Assessment Contact Information:</b><br><i>Complete in full with contact information of the person in your company who is responsible for receiving the Commission's assessment (billing) invoices and paying the assessment under Act 127.</i>   |
|   | Name: Vannessa Spitzer  |
|   | Street Address: 25 Town Center Blvd., Suite C   |
|   | City, State, Zip Code: Clermont, FL 34714   |
|   | Email Address: vspitzer@exploriaresorts.com   |
|   | Telephone Number: (352) 432-2323  |
| 9.  | <b>Federal EIN Number (if applicable):</b> 82-3331732   |
| 10.   | <b>Pipeline Emergency (PEMA) Contact Information:</b><br><i>Complete in full with contact information of the person in your company who the Commission can call in an emergency situation. This information is critical to the Commission's interactions with the Pennsylvania Emergency Management Authority (PEMA).</i> |
|   | Name: Peter Steffen   |
|   | Street Address: 1008 Sand Hill Road   |
|   | City, State, Zip Code: East Stroudsburg PA  |
|   | Email Address: psteffen@exploriaresorts.com   |
|   | Telephone Number: (570) 588-6661  |
| 11.   | <b>Attorney (if applicable):</b><br><i>Complete this section only if an attorney is filing this registration form on your company's behalf.</i>   |
|   | Name:   |
|   | Street Address:   |
|   | City, State, Zip Code:  |
|   | Email Address:  |
|   | Telephone Number:   |
| 12.   | <b>Operational Information:</b>   |
| <b>Comments:</b> Report any newly installed pipeline, and explain any additions, deletions or variations since your previous year's registration.   |   |
| 1,650' of pipe was removed from service. Individual service was built to service no more than 8 Villas per tank. All tank interconnects have been removed. Previously the system as a whole served 171 Villas. It has since been separated. No tank has more than 8 individual units connected. |   |



- Complete Attachments "A" and "B". For each Pennsylvania gas or hazardous liquids pipeline, provide the in-state mileage in operation as of December 31 of the prior year, by class and by county. Mileage should be reported for each individual pipe. Multiple pipelines in one trench are considered individual pipes for reporting purposes. If you have no miles to report on these attachments, check the appropriate block at the top of the form(s).
- Complete Attachment "C" by providing the country of manufacture and mileage data for all tubular steel products installed in the prior calendar year in Pennsylvania for the exploration, gathering or transmission of natural gas or hazardous liquids. If you have no data to report on this attachment, check the appropriate block at the top of the form.

**13. Filing Fee:**

**The filing fee for this Annual Registration Form is \$250, payable to the "Commonwealth of Pennsylvania."**  
 The filing fee can either be mailed or electronically paid when eFiling your form with the Commission's eFiling system.  
**NOTE: If you are a Propane Distributor registered with the PA L&I or a Borough, you are exempt from paying this filing fee.**


Fee Exemptions (please indicate if either exemption applies):

|  |                                     |
|--|-------------------------------------|
| Propane Distributor registered with PA L&I | <input checked="" type="checkbox"/> |
| Borough                                    | <input type="checkbox"/>            |

**14. Verification:**

**The person responsible (corporate officer or attorney) for filing your Annual Registration Form must affix his or her signature and verify that all information provided on the form is true to the best of his or her knowledge, information and belief. NOTE: Registration Forms that are not verified will not be accepted for filing.**

I hereby state that the information in this application is 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).

|  |  |
|--|--|
| <b>Name:</b><br>Michael J. Smith                               | <b>Signature:</b><br> |
| <b>Title:</b><br>EVP Capital Markets & Strategic Opportunities | <b>Date:</b><br>11/28/2023   |

**15. Registration:**

**eFiling:**  
 Registration Forms may be eFiled with the PUC. If eFiling your renewal form, go to <http://www.puc.pa.gov> and click on the eFiling link on the bottom of the page under Issues, News & Reports. Please choose "Existing Case" as the type of filing and enter your docket number where indicated.

**By mail:**  
 Send original, signed copy of registration form along with attachments and filing fee (if applicable) to:  
 Secretary, PA Public Utility Commission  
 Keystone Building, 2<sup>nd</sup> Floor  
 400 North Street  
 Harrisburg, PA 17120

**Reminders:**

- It is the responsibility of registrants to keep the Commission notified of any changes to your contact information by providing notice, in writing, to the Commission's Secretary at the above address.
- Incomplete registration forms or those missing any attachments are unacceptable for filing and will be delayed for processing until the required information is sent to the Commission's Secretary's Bureau. If you require assistance or have questions when completing this form, call 717-772-7777.
- Registrations are public records. Accordingly, DO NOT place social security numbers, credit card numbers, bank account numbers or other confidential information on the registration form.

\*\*\*\*\*PLEASE KEEP A COPY OF YOUR COMPLETED REGISTRATION FORM FOR YOUR RECORDS\*\*\*\*\*

**Additional Comments:** Use this section to add any additional information:

Attachment A

**Hazardous Liquids Lines**  
 Calendar Year Ending: 2022  
 Pipeline Operator: Club Exploria LLC-Pocono Mountain Villas

Please check here if you have no reportable Hazardous Liquids Lines

Please report mileage to the nearest 1/10th of a mile.

HCA = High Consequence Area

| County     | Intrastate |     | Interstate |     | Total |
|------------|------------|-----|------------|-----|-------|
|            | Non-HCA    | HCA | Non-HCA    | HCA |       |
| Adams      |            |     |            |     | 0.0   |
| Allegheny  |            |     |            |     | 0.0   |
| Armstrong  |            |     |            |     | 0.0   |
| Beaver     |            |     |            |     | 0.0   |
| Bedford    |            |     |            |     | 0.0   |
| Berks      |            |     |            |     | 0.0   |
| Blair      |            |     |            |     | 0.0   |
| Bradford   |            |     |            |     | 0.0   |
| Bucks      |            |     |            |     | 0.0   |
| Butler     |            |     |            |     | 0.0   |
| Cambria    |            |     |            |     | 0.0   |
| Cameron    |            |     |            |     | 0.0   |
| Carbon     |            |     |            |     | 0.0   |
| Centre     |            |     |            |     | 0.0   |
| Chester    |            |     |            |     | 0.0   |
| Clarion    |            |     |            |     | 0.0   |
| Clearfield |            |     |            |     | 0.0   |
| Clinton    |            |     |            |     | 0.0   |
| Columbia   |            |     |            |     | 0.0   |
| Crawford   |            |     |            |     | 0.0   |
| Cumberland |            |     |            |     | 0.0   |
| Dauphin    |            |     |            |     | 0.0   |
| Delaware   |            |     |            |     | 0.0   |
| Elk        |            |     |            |     | 0.0   |
| Erie       |            |     |            |     | 0.0   |
| Fayette    |            |     |            |     | 0.0   |
| Forest     |            |     |            |     | 0.0   |
| Franklin   |            |     |            |     | 0.0   |
| Fulton     |            |     |            |     | 0.0   |
| Greene     |            |     |            |     | 0.0   |
| Huntingdon |            |     |            |     | 0.0   |
| Indiana    |            |     |            |     | 0.0   |
| Jefferson  |            |     |            |     | 0.0   |
| Juniata    |            |     |            |     | 0.0   |
| Lackawanna |            |     |            |     | 0.0   |
| Lancaster  |            |     |            |     | 0.0   |
| Lawrence   |            |     |            |     | 0.0   |
| Lebanon    |            |     |            |     | 0.0   |
| Lehigh     |            |     |            |     | 0.0   |
| Luzerne    |            |     |            |     | 0.0   |
| Lycoming   |            |     |            |     | 0.0   |
| McKean     |            |     |            |     | 0.0   |
| Mercer     |            |     |            |     | 0.0   |
| Mifflin    |            |     |            |     | 0.0   |
| Monroe     |            |     |            |     | 0.0   |
| Montgomery |            |     |            |     | 0.0   |

|                |            |            |            |            |            |
|----------------|------------|------------|------------|------------|------------|
| Montour        |            |            |            |            | 0.0        |
| Northampton    |            |            |            |            | 0.0        |
| Northumberland |            |            |            |            | 0.0        |
| Perry          |            |            |            |            | 0.0        |
| Philadelphia   |            |            |            |            | 0.0        |
| Pike           |            |            |            |            | 0.0        |
| Potter         |            |            |            |            | 0.0        |
| Schuylkill     |            |            |            |            | 0.0        |
| Snyder         |            |            |            |            | 0.0        |
| Somerset       |            |            |            |            | 0.0        |
| Sullivan       |            |            |            |            | 0.0        |
| Susquehanna    |            |            |            |            | 0.0        |
| Tioga          |            |            |            |            | 0.0        |
| Union          |            |            |            |            | 0.0        |
| Venango        |            |            |            |            | 0.0        |
| Warren         |            |            |            |            | 0.0        |
| Washington     |            |            |            |            | 0.0        |
| Wayne          |            |            |            |            | 0.0        |
| Westmoreland   |            |            |            |            | 0.0        |
| Wyoming        |            |            |            |            | 0.0        |
| York           |            |            |            |            | 0.0        |
|                |            |            |            |            |            |
| <b>Total</b>   | <b>0.0</b> | <b>0.0</b> | <b>0.0</b> | <b>0.0</b> | <b>0.0</b> |

**Attachment B**

**Mileage**  
**Calendar Year Ending: 2022**  
**Pipeline Operator: Club Exploria LLC-Pocono Mountain Villas**

Please check here if you have no miles to report

Act 127 mileage reporting for this form should not include any pipelines subject to the exclusive jurisdiction of the Federal Energy Regulatory Commission.

Please report mileage to the nearest 1/10th of a mile.

| County     | Number of Farm Taps | Class 1 Gathering (Conventional) | Class 1 Gathering (Unconventional) | Class 1 Transmission & Distribution | Gathering, Transmission & Distribution        |   |   |                                       |
|------------|---------------------|----------------------------------|------------------------------------|-------------------------------------|---|---|---|---------------------------------------|
|            |                     |                                  |                                    |                                     | Class 2 Gathering Transmission & Distribution | Class 3 Gathering Transmission & Distribution | Class 4 Gathering Transmission & Distribution | Total Class 1 T&D + Class 2+3+4 G,T&D |
| Adams      |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |
| Allegheny  |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |
| Armstrong  |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |
| Beaver     |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |
| Bedford    |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |
| Berks      |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |
| Blair      |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |
| Bradford   |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |
| Bucks      |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |
| Butler     |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |
| Cambria    |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |
| Cameron    |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |
| Carbon     |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |
| Centre     |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |
| Chester    |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |
| Clarion    |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |
| Clearfield |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |
| Clinton    |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |
| Columbia   |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |
| Crawford   |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |
| Cumberland |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |
| Dauphin    |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |
| Delaware   |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |
| Elk        |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |
| Erie       |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |
| Fayette    |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |
| Forest     |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |
| Franklin   |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |
| Fulton     |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |
| Greene     |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |
| Huntingdon |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |
| Indiana    |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |
| Jefferson  |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |
| Juniata    |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |
| Lackawanna |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |
| Lancaster  |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |
| Lawrence   |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |
| Lebanon    |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |
| Lehigh     |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |
| Luzerne    |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |
| Lycoming   |                     |                                  |                                    |                                     |   |   |   | 0.0                                   |

|                |            |            |            |            |            |            |            |            |            |
|----------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|
| McKean         |            |            |            |            |            |            |            |            | 0.0        |
| Mercer         |            |            |            |            |            |            |            |            | 0.0        |
| Mifflin        |            |            |            |            |            |            |            |            | 0.0        |
| Monroe         |            |            |            |            |            |            |            |            | 0.0        |
| Montgomery     |            |            |            |            |            |            |            |            | 0.0        |
| Montour        |            |            |            |            |            |            |            |            | 0.0        |
| Northampton    |            |            |            |            |            |            |            |            | 0.0        |
| Northumberland |            |            |            |            |            |            |            |            | 0.0        |
| Perry          |            |            |            |            |            |            |            |            | 0.0        |
| Philadelphia   |            |            |            |            |            |            |            |            | 0.0        |
| Pike           |            |            |            |            |            |            |            |            | 0.0        |
| Potter         |            |            |            |            |            |            |            |            | 0.0        |
| Schuylkill     |            |            |            |            |            |            |            |            | 0.0        |
| Snyder         |            |            |            |            |            |            |            |            | 0.0        |
| Somerset       |            |            |            |            |            |            |            |            | 0.0        |
| Sullivan       |            |            |            |            |            |            |            |            | 0.0        |
| Susquehanna    |            |            |            |            |            |            |            |            | 0.0        |
| Tioga          |            |            |            |            |            |            |            |            | 0.0        |
| Union          |            |            |            |            |            |            |            |            | 0.0        |
| Venango        |            |            |            |            |            |            |            |            | 0.0        |
| Warren         |            |            |            |            |            |            |            |            | 0.0        |
| Washington     |            |            |            |            |            |            |            |            | 0.0        |
| Wayne          |            |            |            |            |            |            |            |            | 0.0        |
| Westmoreland   |            |            |            |            |            |            |            |            | 0.0        |
| Wyoming        |            |            |            |            |            |            |            |            | 0.0        |
| York           |            |            |            |            |            |            |            |            | 0.0        |
| <b>Total</b>   | <b>0.0</b> | <b>0.0</b> | <b>0.0</b> | <b>0.0</b> | <b>0.0</b> | <b>0.0</b> | <b>0.0</b> | <b>0.0</b> | <b>0.0</b> |

**Attachment C**

**Country of Manufacture**  
**Calendar Year Ending: 2022**  
**Pipeline Operator: Club Exploria LLC-Pocono Mountain Villas**

Please check here if you have no lines installed in the previous calendar year

Please report mileage to the nearest 1/10th of a mile

| Country of Manufacture | Length of tubular steel products | Material Test Report (yes/no) |                          |
|------------------------|----------------------------------|-------------------------------|--------------------------|
|                        |                                  | Yes                           | No                       |
|                        |                                  | <input type="checkbox"/>      | <input type="checkbox"/> |
|                        |                                  | <input type="checkbox"/>      | <input type="checkbox"/> |
|                        |                                  | <input type="checkbox"/>      | <input type="checkbox"/> |
|                        |                                  | <input type="checkbox"/>      | <input type="checkbox"/> |
|                        |                                  | <input type="checkbox"/>      | <input type="checkbox"/> |
|                        |                                  | <input type="checkbox"/>      | <input type="checkbox"/> |
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|                        |                                  | <input type="checkbox"/>      | <input type="checkbox"/> |
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|                        |                                  | <input type="checkbox"/>      | <input type="checkbox"/> |
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|                        |                                  | <input type="checkbox"/>      | <input type="checkbox"/> |
|                        |                                  | <input type="checkbox"/>      | <input type="checkbox"/> |
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|                        |                                  | <input type="checkbox"/>      | <input type="checkbox"/> |
|                        |                                  | <input type="checkbox"/>      | <input type="checkbox"/> |
|                        |                                  | <input type="checkbox"/>      | <input type="checkbox"/> |
|                        |                                  | <input type="checkbox"/>      | <input type="checkbox"/> |
|                        |                                  | <input type="checkbox"/>      | <input type="checkbox"/> |
|                        |                                  | <input type="checkbox"/>      | <input type="checkbox"/> |
| <b>Total</b>           | 0.0                              |                               |                          |

**Original Letter to Rosemary Chiavetta,  
Secretary of PAPUC  
dated March 24, 2023**

DATE OF DEPOSIT

NOV 30 2023

PA PUBLIC UTILITY COMMISSION  
600 MARKET STREET, PHILADELPHIA, PA 19106



March 24, 2023

Rosemary Chiavetta  
Secretary's Bureau  
Pennsylvania Utility Commission  
Commonwealth Keystone Building  
2<sup>nd</sup> Floor, Room-N201  
400 North Street  
Harrisburg, PA 17120

RE: Utility Code 1721803 And Act 127 Pipeline Classification

Dear Secretary Chiavetta,

By this letter we wish to request that Club Exploria LLC-Pocono Mountain Villas, Utility Code #1721803, be removed from the Pa Act 127 Pipeline Operator Registry.

Over the past several months Club Exploria LLC has made numerous modifications and system changes, which we believe, warrant this request. Our original Act 127 Classification as Jurisdictional, was primarily due to the interconnect of 171 Villas on our private property here in Bushkill Pa via small gas distribution lines from several interconnected tanks. Our work over the past several months has resulted in the removal of all interconnected appurtenances between tanks, as well as, each of our tank locations, or propane sources, which now feed 8 villas or less, within our private community.

Club Exploria LLC has maintained an open dialogue with Jim Harcher, PUC Pipeline Safety Bureau of Investigation and Enforcement, as well as Michael Chilek, and Ryan Zaffino of the PUC. These gentlemen have made the effort to come to our property to witness our system changes. I do believe they will concur that this request to be removed from the Pa Act 127 Pipeline Operator Registry, is legitimate and warranted.

To be safe, Club Exploria LLC will be filing the Act 127 Annual Registration, prior to March 31, 2023. Neither myself, or Jim Harcher was absolutely sure how this procedure to remove Club Exploria LLC from the registry would take place, so to be safe, we will file. If you were to access this latest filing you will note a brief description of pipeline removed as well as the villa count from a single source.

I appreciate your time in this matter and look forward to your response.

Sincerely,

Peter J. Steffen OPID 39902  
Resort Engineer, Club Exploria LLC-Pocono Mountain Villas

Copy Via E-mail:  
Jim Harcher, PUC Michael Chilek, PUC, Ryan Zaffino PUC  
Chad Lowry, General Manager-Pocono Mountain Villas



**Response Letter from Rosemary Chiavetta,  
Secretary of PAPUC to Club Exploria  
dated November 16, 2023**

DATE OF DEPOSIT

NOV 30 2023

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU



**COMMONWEALTH OF PENNSYLVANIA**  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
COMMONWEALTH KEYSTONE BUILDING  
400 NORTH STREET  
HARRISBURG, PENNSYLVANIA 17120  
November 16, 2023

Docket No. A-2019-3007513  
Utility Code: 1721803

**CERTIFIED**

PETER J STEFFEN  
CLUB EXPLORIA LLC  
POCONO MOUNTAIN VILLAS  
PO BOX 447 RT 209  
BUSHKILL PA 18324

**RE: Request to be Removed from the Act 127 Operator Registry**

Dear Mr. Steffen:

The Pennsylvania Public Utility Commission (Commission) has received Club Exploria, LLC-Pocono Mountain Villa's (Club Exploria) request dated March 24, 2023, to be removed from the Act 127 Pipeline Operator Registry. In order for us to complete our review of your request, the Commission's Energy Industry Group requires answers to the attached questions.

Please be advised that you are directed to forward the requested information to the Commission within **20** days of receipt of this letter. For guidance with Act 127 compliance, please refer to the Commission's website link at:

[http://www.puc.pa.gov/utility\\_industry/natural\\_gas/pipeline\\_safety.aspx](http://www.puc.pa.gov/utility_industry/natural_gas/pipeline_safety.aspx).

The Commission strongly encourages submission through efilings with the Secretary of the Commission by opening an efilings account through the Commission's website and accepting eservice at <https://efiling.puc.pa.gov>. The Commission is accepting all public documents through our efilings system at this time.

If your filing contains confidential material, you are required to either file by overnight delivery or submit to the Secretary's Share Point File system to ensure the timely filing of your submission. Filers should contact the Secretary's Bureau in advance to gain access to the Share Point File system. Make sure to reference the Docket Number listed above when filing your response and mark the materials "CONFIDENTIAL" in bold or highlighted manner if any of the requested information is deemed to be of a confidential nature.

The overnight address for hard-copy or confidential responses is:

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA, 17120

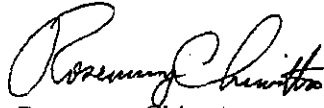
**Your answers should be verified per 52 Pa Code § 1.36.** Accordingly, you must provide the following statement with your responses:

*I, [print name of appropriate company representative], hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).*

Signature PETER J. STEVEN  
Title RESORT ENGINEER  
Date 11/27/23

In addition, to expedite completion of the Act 127 registration, please send a copy of your response to Lee Yalcin at [lyalcin@pa.gov](mailto:lyalcin@pa.gov). If any problems arise that prevent a full timely response or if any clarification of these data requests is needed, please contact Lee Yalcin of the Bureau of Technical Utility Services via e-mail at [lyalcin@pa.gov](mailto:lyalcin@pa.gov) (preferred) or (717) 787-6723.

Sincerely,

  
Rosemary Chiavetta  
Secretary

Enclosure

Club Exploria, LLC-Pocono Mountain Villas  
Docket No. A-2019-3007513  
Data Requests

1. Please confirm that all of the actions mentioned in Club Exploria's March 24, 2023 letter to the Commission have been completed and explain any additional steps Club Exploria has taken to become non-jurisdictional and exempt from complying with Act 127.
2. Please provide the Act 127 Annual Registration to the Commission ASAP. Alternatively, please provide the date this was filed with the Commission and the tracking information.
3. Please provide documentation or citations supporting Club Exploria's assertions that it would be exempt from the Commission's regulations.
4. Please provide documentation from the U.S. Department of Transportation's Pipeline and Hazardous Materials Safety Administration (PHMSA) that clearly designates Club Exploria as non-jurisdictional and exempts Club Exploria from the mandates of Act 127.
5. Please explain if any of Club Exploria's gas lines are in, or cross any, public areas.
6. Please explain the types of entities/customers that Club Exploria's gas lines provide service to.

ORIGIN ID:UKTA (570) 588-6661  
DAVID BROWN

1008 SAND HILL RD

EAST STRONDSBURG, PA 18302  
UNITED STATES US

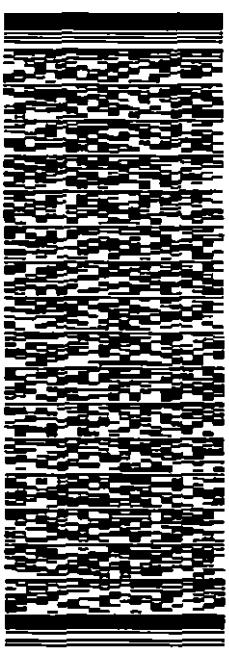
BILL SENDER

SHIP DATE: 30NOV23  
ACTWGT: 1.00 LB  
CAD: 114111803/NET4660

TO ROSEMARY CHIAVETTA, SECRETARY  
PENNSYLVANIA PUBLIC UTILITY COMMISS  
400 NORTH STREET  
2ND FLOOR  
HARRISBURG PA 17120

583.K17D129AE3

(570) 588-6661 X 2306 REF: KIM STEIN/ ACCOUNTING  
INV. DEPT:  
PO:

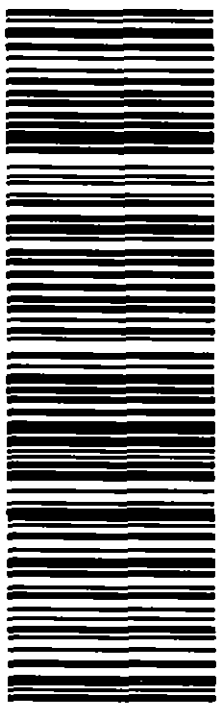


TRK# 7742 9407 5811  
0201

FRI - 01 DEC 12:00P  
PRIORITY OVERNIGHT

ENMDTA

PA-US 17120  
MDT



RECEIVED

DEC 1 2023

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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2. Fold the printed page along the horizontal line.
3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

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