

In re: Joint Application of Deer Haven, L.L.C.	:	
and PL Utilities, LLC for: (1) a Certificate of Public	:	
Convenience Authorizing Commencement of	:	
Sanitary Sewer Service of PL Utilities in Portions	:	
of Palmyra Township, Pike County; (2) a	:	Docket No. A-2024- _____
Certificate of Public Convenience for Deer Haven,	:	Docket No. A-2024- _____
LLC Authorizing Abandonment of Sanitary	:	Docket No. A-2024- _____
Sewer Service; (3) Approval of the Proposed Tariff	:	Docket No. M-2024- _____
of PLU Utilities; and (4) Approval of Certain	:	
Affiliated Interest Agreements of PLU Utilities	:	

JOINT APPLICATION FOR ISSUANCE OF CERTIFICATE OF
PUBLIC CONVENIENCE AND ABANDONMENT

TO THE HONORABLE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Deer Haven L.L.C. ("Deer Haven" or "Transferor") and PL Utilities ("PLU" or "Transferee") (both the Deer Haven and PLU individually, an "Applicant" and together the "Joint Applicants") hereby respectfully request that the Pennsylvania Public Utility Commission ("Commission") approve this Joint Application For Issuance Of Certificate Of Public Convenience And Abandonment as follows: (a) the Commission grant a Certificate of Public Convenience to PLU allowing it to begin to offer, furnish, or supply sanitary sewer service to the public in portions of Palmyra Township, Pike County, Pennsylvania pursuant to Title 66 § 1102(a)(1); (b) the Commission grant the Application for Abandonment by Deer Haven of all sanitary sewer service to the public, the cessation of all rights and obligations of Deer Haven as a public utility, and the termination of all regulatory responsibility for operation of the Sewer System by Deer Haven pursuant to Title 66 § 1102(a)(2);¹ (c) the Commission approve the proposed Tariff of PLU under

¹ Attached hereto as Exhibit A is the Application for Approval of Abandonment or Discontinuance of Service, In Whole or In Part, and its accompanying attachments submitted by Deer Haven, L.L.C. Also attached hereto as Exhibit B is the Application for Certificate of Public Convenience and its accompanying Attachments submitted by PL Utilities, LLC.

Title 66 §1103(d), and (d) the Commission approve the various affiliate agreements described in this Application pursuant to Title 66 § 2102.

Due to the deteriorating condition of the existing wastewater treatment plant, the Joint Applicants respectfully request expeditious review of this important Application and Commission approval on or before the August 22, 2024, Public Meeting.

In support thereof, the Joint Applicants aver as follows:

Introduction

1. This matter relates to the transfer of a sanitary sewer system located in Palmyra Township, Pike County, Pennsylvania ("Sewer System") from Deer Haven to PLU. Deer Haven, L.L.C. ("Deer Haven"), a limited liability company organized under the provisions of the New Jersey Limited Liability Company Act, was formed on May 24, 2002 to do any and all lawful activities for which a business may be incorporated under the New Jersey Limited Liability Company Act and to operate and maintain a wastewater collection system and sewage treatment plant.

2. The wastewater collection system and sewage treatment plant initially was owned and operated by Edwin, Inc. and Edwin was subsequently acquired by Gerald G. Gawron, Jerome E. Gawron, Marcella A. Gawron. The PUC approved that transfer in 1999.

3. In 2004, Deer Haven entered into an agreement to acquire all of the Edwin common stock, together with all assets used and useful in the provision of wastewater collection and treatment services to the public, including but not limited to, collection mains, pumps, treatment facilities, and all other equipment and facilities used by Edwin in its provision of wastewater services. The PUC approved this transfer in or about 2008.

4. In or about 2004, Deer Haven and its affiliate Haven Development owned approximately 85 acres of property in Palmyra Township, Pike County, Pennsylvania (the "Property") that included the site where the wastewater treatment plant and most of the wastewater collection system was located in Palmyra Township, Pike County, Pennsylvania. The intent of Deer Haven and Haven Development at that time was to complete phased redevelopment of the area, including the construction of up to 365 dwelling units, as well as a new road, a new wastewater collection system and a Community Center (the "Project"). In addition, in one of the future phases of the Project, a new wastewater treatment plant was to be constructed to replace the existing plant.

5. In 2010, Deer Haven and Haven Development entered into a Purchase and Sale Agreement with Pocono Lakefront, LLC ("Pocono") for the sale of the Property, including the land on which the Sewer System is located. The parties closed on the Agreement, and Pocono is the current owner of the Property. At the same time, Deer Haven and Pocono entered into a Grant of Capacity and Option to Purchase Agreement for the Sewer System associated with the property subject to PUC approval. See Abandonment Application, Attachment 2. Under that Agreement Deer Haven granted to Pocono Lakefront, its successors and assigns, the option to purchase the Deer Haven Sewer Company for \$1.00, subject to approval by the PUC of the transfer of the Certificates of Public Convenience to Pocono Lakefront.

6. Pocono is a Pennsylvania Limited Liability Company formed in 2010 to develop property that is located within the service territory. The sole member of Pocono Lakefront is a trust formed by Jacob Goren. See Certificate of Organization and current Subsistence Certificate for Pocono Lakefront, attached as Certificate Application, Attachments I and I-1, respectively. PLU is a Pennsylvania Limited Liability Company formed in 2015, whose sole member will be Jacob

Goren when the PUC approves this Application. See Certificate of Organization and current Subsistence Certificate for PL Utilities LLC, attached as Certificate Application, Attachments A and A-1, respectively.

7. In 2014, as authorized by the Grant of Capacity and Option to Purchase Agreement, Pocono and Deer Haven entered into a Purchase Agreement under which Pocono would purchase the Sewer System subject to obtaining PUC approval. ("Utility Agreement") See Abandonment, Attachment 3. The Utility Agreement also allowed for Pocono to form a new company to hold the Certificate of Public Convenience once the new Sewer System has been constructed. After some delays, and as a result of the settlement of a lawsuit in New Jersey, the parties intend to move forward with the transfer of the sewer system from Deer Haven to PLU. In accordance with the Utility Agreement, PLU was formed to own and operate the Sewer System, which is why it is the entity seeking the Certificate of Public Convenience.

8. In late 2015, the Pennsylvania Department of Environmental Protection issued a Water Quality Management Permit No. 5215401, allowing the construction of a new wastewater treatment plant (WWTP) and associated sewer lines/connections. In 2023, the new WWTP was substantially completed. PLU owns the new WWTP, which was funded through a loan from the member of PLU. See Certificate Application, Exhibit J. The WWTP was tested in early 2024, and is ready to be put into service. The only remaining construction work to be done is to make the final connections to the existing sewer system so that the old treatment plant can be shut down and the new one turned on to take its place. The parties are working with the Pennsylvania Department of Environmental Protection and the Delaware River Basin Commission to obtain the necessary wastewater discharge permits, the approval needed under Act 537 for the transfer of the Sewer System.

9. With respect to the Act 537 process, on December 8, 2014, the PaDEP approved an Act 537 Amendment contemplating the construction of the new treatment plant and the development that would ultimately accompany it. See Attachment B. However, the Department also is requiring PL Utilities to obtain an Act 537 Amendment approving the transfer of the sewer system from Deer Haven to PL Utilities. Consequently, PL Utilities, in conjunction with Palmyra Township, has a proposed Act 537 Amendment seeking approval of the transfer that will be published in the local newspaper on the date this Application is filed and will go through a 30-day public comment period. See Attachment C for the advertisement. The County and Township Planning Commission have already approved. See Attachments D and E. Once the public comment period is over, the Township will pass a resolution approving and then it goes to PaDEP for review and approval.

10. PLU intends to use qualified third-party providers to operate the wastewater treatment system on a day-to-day basis in compliance with all regulatory requirements. PLU is negotiating an agreement with Environmental Services Corporation of Pennsylvania (ESC) under which ESC will operate the wastewater system upon approval of the transfer by the PUC and the issuance of the permits from the Pennsylvania Department of Environmental Protection and the Delaware River Basin Commission. See Certificate Application, Attachment F. ESC has more than 50 years combined experience in waste removal and water management, offering both certified wastewater and water operators to oversee, operate and management their client's facilities. See Certificate Application, Attachment GF.

11. With respect to the administrative aspect of owning and operating a wastewater treatment, such as billings and communications with customers, PL Utilities will enter into an agreement with a related company, Empire Industries, to provide those administrative services,

See Certificate Application, Attachment H. The proposed Agreement between PL Utilities and Empire will be executed upon the PUC granting the Certificate to PLU.

12. Empire Industries, founded in 1976, is a national company with distribution centers in New Jersey and California and a manufacturing facility in New Jersey. It manufactures and sells a variety of kitchen and bathroom vanities, closets and medicine cabinets to meet the needs of high end showrooms and new construction projects. It also has operations in four Asian and three European countries. Empire has a management team and more than 50 employees. Jacob Goren is the President of Empire Industries. Empire Industries has the personnel qualified to perform the types of administrative services that are needed for PL Utilities.

13. The property on which the sewer system and new WWTP are located is owned by Pocono. Pocono is willing to enter into an Easement Agreement with PLU granting PLU a permanent easement relating to the Sewer System. See Certificate Application, Attachment I. The proposed Easement Agreement will be executed and recorded upon the PUC granting the Certificate to PLU.

The Parties

14. The name and address of the Transferor, seeking to abandon the Sewer System is:

Deer Haven, L.L.C.
Attn: Sam Shahar
839 Route 507
Greentown, PA 18426
samshahar@yahoo.com

15. The name and address of the Transferee and seeking to obtain the Certificate of Public Convenience is:

PL Utilities, LLC
Attn: Jacob Goren
61 West 62nd Street, #22E
New York, NY 10023

16. The attorney for the Transferor is:

Adeolu A. Bakare
McNees Wallace & Nurick LLC
100 Pine Street
Harrisburg, PA 17101
Tel: 717.237.5290 | Fax: 717.260.1744
abakare@mcneeslaw.com

17. The attorney for the Transferee is:

Mark J. Shaw
MacDonald, Illig, Jones & Britton LLP
100 State Street, Suite 700
Erie, PA 16507-1459
Office: (814) 870-7607 | Fax: (814) 454-4647
mshaw@mijb.com

The Applicable Legal Framework

18. Section 1102(a)(1) of the Public Utility Code, 66 Pa.C.S. § 1102(a)(1), requires a public utility to obtain Commission approval to begin to offer, render, furnish or supply a public utility service in the form of a Certificate of Public Convenience.

19. Section 1102(a)(3) of the Public Utility Code, 66 Pa.C.S. § 1102(a)(3), requires a public utility to obtain Commission approval to abandon a public utility service.

20. Section 1102(a)(3) of the Public Utility Code, 66 Pa.C.S. § 1102(a)(3), requires a public utility to obtain Commission approval, to acquire from or to transfer property used or useful in the public service.

21. Section 1103 of the Public Utility Code, 66 Pa.C.S. § 1103, provides that the Commission may grant a certificate of public convenience when it "find[s] or determine[s] that the granting of such certificate is necessary or proper for the service, accommodation, convenience, or safety of the public."

22. Finally, Section 2102(a) of the Public Utility Code, 66 Pa.C.S. § 2102(a), provides, in pertinent part,

No contract or arrangement providing for the furnishing of management, supervisory, construction, engineering, accounting, legal, financial, or similar services, and no contract or arrangement for the purchase, sale, lease, or exchange of any property, right, or thing or for the furnishing of any service, property, right or thing other than those above enumerated, made or entered into ... between a public utility and any affiliated interest shall be valid or effective unless and until such contract or arrangement has received the written approval of the commission.

23. Further, Section 2102(b) of the Public Utility Code, 66 Pa.C.S. § 2102(b), provides, in pertinent part,

It shall be the duty of every public utility to file with the commission a verified copy of any such contract or arrangement, or a verified summary as described in subsection (a) of any such unwritten contract or arrangement. All such contracts and arrangements, whether written or unwritten, entered into prior to the effective date of this section and required to be on file with the commission by prior act and in full force and effect at the effective date of this section shall be subject to the provisions of the sections regarding affiliated interests. The commission shall approve such contract or arrangement made or entered into after the effective date of this section only if it shall clearly appear and be established upon investigation that it is reasonable and consistent with the public interest. If at the end of 30 days after the filing of a contract or arrangement, no order of rejection has been entered, such contract or arrangement, whether written or unwritten, shall be deemed, in fact and law, to have been approved. The commission may, by written order, giving reasons therefor, extend the 30-day consideration period. No such contract or arrangement shall receive the commission's approval unless satisfactory proof is submitted to the commission of the cost to the affiliated interest of rendering the services or of furnishing the property or service described herein to the public utility. No proof shall be satisfactory within the meaning of the foregoing sentence unless it includes the original (or verified copies) of the relevant cost records and other relevant accounts of the affiliated interest, or such abstract thereof or summary taken therefrom as the commission may deem adequate, properly identified and duly authenticated. The commission may, where reasonable,

approve or disapprove such contracts or arrangements without the submission of such cost records or accounts.

24. The record provided here supports the approval of the abandonment of the Sewer System by Deer Haven, the issuance of the Certificate of Public Convenience to PLU and the Commission's approval of the affiliate agreements between PLU, Pocono, Empire and Jacob Goren.

The Expedited Issuance of Certificates of Pubic Convenience for the Abandonment of Sanitary Sewer Service by Deer Haven and the Issuance of the Certificate of Public Convenience to PLU Is in the Public Interest

25. The Commission is to issue a Certificate of Public Convenience if it is in the public interest to do so. The following factors are evaluated to determine whether the issuance is in the Public Interest:

- a. Public need
- b. Technical capability
- c. Financial capability
- d. Experience, fitness, managerial organization, and financial resources
- e. Customers' rates being increased or not and
- f. Increase or reduction in services to the public

When these factors are considered, it is clear that the issuance would be in the public interest.

26. The existing WWTP has reached the end of its useful life and has struggled in the past few years with maintaining compliance with the discharge limits in the NPDES permit for the facility.

27. Deer Haven, having sold all of its property interests in the service territory, no longer has any interest in continuing to own and operate the Sewer System. The Joint Applicants request approval of this Application to allow for the decommissioning of the aged Deer Haven sewer treatment plant and commencement of service of PLU's newly constructed sewer treatment

plant, subject to issuance of permitting for the new plant by the Pennsylvania Department of Environmental Protection and the Delaware River Basin Commission. Deer Haven currently services 61 customers, all of which are Residential. A map of the existing service area and area to be abandoned, including the description of the boundaries, is provided as Abandonment Application, Attachment 1. Deer Haven currently collects approximately \$34,000 per year from customers. Deer Haven's administrative records are imperfect, but PLU estimates annual expenses to operate the existing treatment plant are approximately \$50,000 per year. Expedited abandonment of the aged Deer Haven sewer treatment plant is in the public interest, particularly for the Deer Haven customers.

28. Deer Haven also does not have the financial wherewithal to continue owning and operating the Sewer System, especially given the fact that rates have not changed since 2011.

29. In contrast, PLU has the wherewithal and interest to serve as the public utility for the Sewer System.

30. First, and most importantly, PLU owns a brand new WWTP that is just waiting to be connected to the Sewer System's collection system so that the existing WWTP can be taken off line and demolished. The new system has the same flow rating as the existing system, but is completed brand new and was constructed at a cost in excess of \$2.6 million. The system was funded by the members of PLU in cash, evidencing the substantial financial resources of PLU.

31. The existence of the new WWTP supports the technical capability of PLU to own and operate the Sewer System. At the new WWTP, the wastewater first enters the treatment plant and passes through the inlet bar screen. This step removes large debris and solid objects to prevent damage to downstream equipment. After screening, the wastewater flows into the Equalization Tank (EQ Tank). Two EQ pumps help to regulate the flow of wastewater into the tank, ensuring

uniform distribution and preventing overload or shock to subsequent treatment processes. From the EQ tank, the wastewater moves into two exterior aeration tanks. Here, aerobic bacteria are encouraged to grow by pumping air into the tanks. These bacteria help in breaking down organic pollutants through activated sludge treatment. The partially treated wastewater then enters two clarifiers. In these tanks, the activated sludge settles to the bottom while clearer water rises to the top. This separation process allows for the removal of suspended solids and particulate matter from the water. After clarification, the water undergoes further settling in two secondary settling tanks. This step facilitates the separation of remaining sludge from the treated water before it proceeds to advanced treatment stages. The pre-treated water then enters three pressure tertiary filters. These filters capture smaller particles and impurities that may have escaped previous treatment steps, ensuring a higher level of water purity. After filtration, the water undergoes UV disinfection in four UV disinfection tanks. Ultraviolet light is used to kill or inactivate harmful microorganisms present in the water, ensuring it meets safety standards for discharge into the environment or for reuse purposes.

32. In addition to the construction of a new WWTP, the new WWTP will be operated by a certified operator retained by PLU. PLU has reached agreement with the certified operator of the existing WWTP as described above. This Certified operator will ensure the safety, viability and professional management of the Sewer System. With the certified operator, PLU has the technical capability and experience to operate the Sewer System.

33. The combination of the new WWTP and the certified operator will ensure that the system will be operated properly and will enable it to meet the discharge limits imposed on the new WWTP. Thus, the use of this new system will result in cleaner water being discharged into

Lake Wallenpaupack, which is in the public interest, and will serve a public need given the condition of the existing WWTP.

34. The issuance of the Certificate of Public Convenience to PLU also will be in the interest of the customers of the Sewer System, who will be guaranteed to have a properly operating Sewer System for the foreseeable future.

35. On the administrative side, PLU is going to rely on its affiliate, Empire to handle those tasks. Empire Industries, founded in 1976, is a national company, with distribution centers in New Jersey and California and a manufacturing facility in New Jersey. It manufactures and sells a variety of kitchen and bathroom vanities, closets and medicine cabinets to meet the needs of high-end showrooms and new construction projects. It also has operations in four Asian and three European countries. Empire has a management team and more than 50 employees. Jacob Goren, who is one of the members of PLU, is the President of Empire Industries. Empire Industries has the personnel qualified to perform the billing, accounting, file management, and other types of administrative services that are needed for PLU with more responsive customer service and regulatory compliance than Deer Haven.

36. With respect to customer rates, PLU is not proposing to change the rates as part of this Application, but avers that future rate increases will be necessary. The current rate of \$46.60 per month per user has been in place for fourteen (14) years, and does not cover the existing operating costs, let alone a return on the investment made into the Sewer System. PLU will propose future rate increases in compliance with the Commission's rules and regulations.

37. Lastly, the services under PLU ownership of the system will actually improve since the wastewater from the customers will now be treated by the new WWTP.

38. While the Joint Applicants will supplement this Application with additional information that the Commission may reasonably may require, the Joint Applicants believe the Application provides grounds for expedited review and approval. PLU is financially and technically capable of providing safe and adequate service to the current customers using the newly constructed sewer treatment plant at its disposal, whereas Deer Haven lacks the resources to sustain service compliant with the Commission rules and regulations. Additionally, the Joint Applicants have served notice of the Application directly upon all customers and will publish notice in a newspaper of general circulation serving the affected territory upon receipt of the proposed notice from the Commission pursuant to 52 Pa. Code § 5.14(1)-(2). See Abandonment Application, Attachment 4. The Joint Applicants do not anticipate Protests to the Application. **For these reasons, the Joint Applicants respectfully request that the Commission take up this matter no later than the August 22, 2024, Public Meeting.**

The Affiliate Agreements between PLU and Pocono, Empire and Jacob Goren are Reasonable and Consistent with the Public Interest

Easement

39. All of the land on which the Sewer System is located is currently owned by Pocono. Pocono is not a public utility, nor does it have any interest in becoming a public utility. Pocono is an affiliate of PLU as its sole member is a Trust established by Jacob Goren, who is also a member of PLU. In addition, PLU will serve as the sewer system utility for any development that Pocono will perform in the future. As part of the acquisition of the Sewer System, PLU has an agreement with Pocono for both to execute for a nominal cost (\$1.00) a Sanitary Sewer System Easement that will be recorded. See Certificate Attachment M.

40. Under the Easement, Pocono grants PLU an exclusive, permanent easement over the Property for the location of the existing sanitary sewer system installed throughout the Property, including the right of reasonable ingress and egress through, under and across the Property.

41. The Easement also will run with the land and be binding on successors and assigns.

42. Under the Easement, Pocono grants PLU "for the sole purpose to install, construct, reconstruct, replace, remove, enlarge, inspect, operate, repair, make connections with and maintain perpetually the existing sanitary sewer system, including underground pipe, conduits, manholes, drains, markers, mains, service connections, pump stations, existing wastewater treatment plant, new waste water treatment plant and other appurtenances upon, over and under the Property."

43. Based on the above, it is clear that this Easement is reasonable and consistent with the public interest.

Services Agreement

44. PLU intends to rely on the administrative support available at Empire. As noted above, Empire is a multinational corporation with a large administrative staff capable of providing the type of administrative assistance that PLU will need to operate the system. Jacob Goren will oversee PLU, but he will use the staff at Empire to assist in those efforts.

45. The Services Agreement is modelled after service agreements that Commission has approved in the past. See Certificate Attachment H. If Empire charges PLU for a service, such charge will be invoiced monthly and the amount will be based on the actual costs incurred with no markup or general overhead added. Further shared services will be proportioned appropriately such that PLU is only responsible for services provided to support the regulated sewer operations.

46. Based on the above, it is clear that this Services Agreement is reasonable and consistent with the public interest.

Loan Documentation

47. Jacob Goren, as the member of PLU fronted the funds to construct the new WWTP and associated construction of sewer liens and pump stations.

48. Upon PUC approval of this Application, Jacob Goren will enter into a Judgement Note ("Note") with PLU to assure that the funds invested for construction by Jacob Goren are eventually paid back to them by PLU. See Certificate Application, Attachment J. There is no interest rate on the Note, and the first principal payment will not occur until July 1, 2029. Both of these terms are very favorable to PLU. Accompanying the Note are an Amortization Schedule showing the payments over time, a Security Agreement providing a security interest for Mr. Goren in the assets of PLU and a General Assignment and Bill of Sale to ensure clear title to the Sewer System, including the new WWTP in PLU.

49. Recognizing the inability of PLU to pay on the Note due to the lack of current revenue available to fund the payments, Mr. Goren is willing to delay the initiation of any payments on the Note upon the earlier of either event occurring: the approval by the PUC of a rate increase sufficient to cover the costs associated with the Note or the sale of PLU to an unrelated third party.

50. Based on the above, it is clear that these this Services Agreement is reasonable and consistent with the public interest.

Conclusion

51. Joint Applicants believe the transfer of the Sewer System is in the public interest and in the best interest of the customers of the Sewer System and the public. Approval of the Joint Application is necessary or proper in order for the public served by the Sewer System to benefit by continuing to receive sewer services from a company with the resources and personnel to provide safe and reliable sewer services in the future. Joint Applicants submit that the acquisition is in the public interest and is necessary for the provision of safe and reliable sewer services because PLU can assure the short and long term reliability of the Sewer System, which Deer Haven is no longer in a position to do.

WHEREFORE, Joint Applicants respectfully request that the Commission, pursuant to the provisions of the Public Utility Code, 66 Pa.C.S. §§ 1101-1103 and 2101, et seq., approve the Joint Application on an expedited basis as requested above and issue an Order subject to issuance of permitting for the new plant by the Pennsylvania Department of Environmental Protection and the Delaware River Basin Commission. as follows:

A. Approving the transfer of the Sewer System from Deer Haven, L.L.C. to PL Utilities, LLC;

B. Granting a Certificate of Public Convenience to PL Utilities LLC Park Water Corporation, Inc. allowing it to begin to offer, furnish, or supply sewer service to the public in the designated service area of Palmyra Township;

C. Granting the Application for Abandonment by Deer Haven, L.L.C. of all sewer service to the public, the cessation of all rights and obligations of Deer Haven as a public utility, and the termination of all regulatory responsibility for operation of the Sewer System by Deer Haven; he Trustees; and

- D. Approving the affiliate agreements between PL Utilities, Pocono Lakefront, LLC, Empire Industries, and Jacob Goren;
- E. Approving the proposed Tariff of PL Utilities; and
- F. Approving any and all waivers deemed necessary to grant the relief requested in the Joint Application.

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 PL Utilities, LLC



Adeolu A. Bakare
McNees Wallace & Nurick LLC
100 Pine Street
Harrisburg, PA 17101
(717) 237-5290

Attorneys for Deer Haven, L.L.C.

VERIFICATION

I, Salah Mekkawy, hereby depose and state that I am a member of Deer Haven, L.L.C. and that the averments set forth in the foregoing Joint Application and the Application for Approval of Abandonment are true and correct to the best of my knowledge, information and belief. This Verification is made subject to the penalties of 18 Pa. C.S.A. § 4904 relating to intentional falsification to authorities.

Dated: June 14, 2024

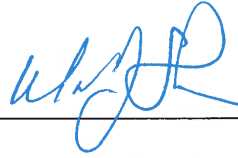
DocuSigned by:
Salah Mekkawy
666DD485DF68428...

Salah Mekkawy

CERTIFICATE OF SERVICE

I hereby certify that I have on this date June 17, 2024, served a true copy of the foregoing document(s) upon the participants, listed below, in accordance with the requirements of ¶ 1.54 (relating to service by a participant):

Office of Consumer Advocate 555 Walnut Street 5th Floor Forum Place Harrisburg, PA 17101-1923	Office of Small Business Advocate Commerce Building, Suite 1102 300 North Second Street Harrisburg, PA 17101
Bureau of Investigation and Enforcement Pa PUC P.O. Box 3265 Harrisburg, PA 17105	Dept. of Environmental Protection Northeast Regional Office 2 Public Square Wilkes-Barre, PA 18701-1915
Dept. of Environmental Protection Rachel Carson State Office Building 400 Market Street Harrisburg, PA 17101	Pike County Planning Commission 506 Broad Street Milford, PA 18337
Pike County Commissioners 506 Broad Street Milford, PA 18337	Palmyra Township 115 Buehler Lane Paupack, PA 18451
Palmyra Township Planning Commission 115 Buehler Lane Paupack, PA 18451	

Signature:  _____

Name: (Printed): Mark J. Shaw _____

Title (Printed): Attorney _____