



Regulation is a maze. We can show you the way!

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October 3, 2024

**VIA ELECTRONIC FILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, Filing Room  
Harrisburg, PA 17120

Re: Application For Certificate Of Public Convenience And All Necessary Approvals Nunc Pro Tunc For Mainlines, Manholes & Wastewater Treatment Inc. To Provide Wastewater Services To Portions Of Girard Township and Waterford Township, Erie County, Pennsylvania, Approval Of Affiliated Interest Agreement, And All Other Approvals As May Be Necessary Or Proper, Including an Affiliated Interest Agreement; Docket Nos. A-2024-3050786 and G-2024-\_\_\_\_\_; **MMWT RESPONSES TO BTUS DATA REQUESTS, SET 1, NOS. 1 AND 2**

Dear Secretary Chiavetta:

Enclosed you will find Mainlines, Manholes & Wastewater Treatment Inc.'s Responses to Bureau of Technical Utility Services' Data Requests, Set 1, Nos. 1 and 2, in the above-captioned proceeding.

Very truly yours,

*/s/ Whitney E. Snyder*

Whitney E. Snyder  
Aaron D. Rosengarten

*Counsel for  
Mainlines, Manholes & Wastewater Treatment Inc.*

WES/das

Enclosures

cc: Paul Zander, BTUS ([pzander@pa.gov](mailto:pzander@pa.gov))  
Per Certificate of Service

Application of Mainlines, Manholes & Wastewater Treatment, Inc. for approval, *nunc pro tunc*, of the right to begin to offer, render, furnish, and supply wastewater service to the public in portions of Girard and Waterford Townships, Erie County, Pennsylvania  
Docket No. A-2024-3050786

**MAINLINES, MANHOLES & WASTEWATER TREATMENT, INC.’S RESPONSES TO BUREAU OF TECHNICAL UTILITY SERVICES DATA REQUEST SET 1**

A-1. The Application requests Commission approval, *nunc pro tunc*, for Mainlines to provide wastewater service in portions of Girard Township (Girard) and Waterford Township (Waterford), Erie County, including the Imperial Point Mobile Home Park (Imperial Point MHP), the Waypoint Mobile Home Park (Waypoint MHP, and together with the Imperial Point MHP, the Affiliated MHPs), and the related service territories that include the Affiliated MHPs (individually, the Imperial Point Territory and the Waypoint Territory, and collectively, the Requested Territory). The map provided as the Application’s Exhibit A is not legible, does not clearly depict the boundaries of each portion of the Requested Territory, and does not depict the location or route of Mainlines’ wastewater facilities in the Imperial Point Territory (Imperial Point Wastewater System) and the Waypoint Territory (Waypoint Wastewater System, and together with the Imperial Point Wastewater System, the Mainlines Wastewater Systems). Please provide a legible map with a suitable scale that depicts the boundaries of each portion of the Requested Territory and that depicts the location or route of all wastewater facilities owned or operated by Mainlines.

**RESPONSE:** Please see attached document titled “Maps for service area – Waterford Twp.”

**PROVIDED BY:** Stacy Luciano

**DATE:** October 3, 2024

Application of Mainlines, Manholes & Wastewater Treatment, Inc. for approval, *nunc pro tunc*,  
of the right to begin to offer, render, furnish, and supply wastewater service to the public in  
portions of Girard and Waterford Townships, Erie County, Pennsylvania  
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**MAINLINES, MANHOLES & WASTEWATER TREATMENT, INC.’S RESPONSES TO  
BUREAU OF TECHNICAL UTILITY SERVICES DATA REQUEST SET 1**

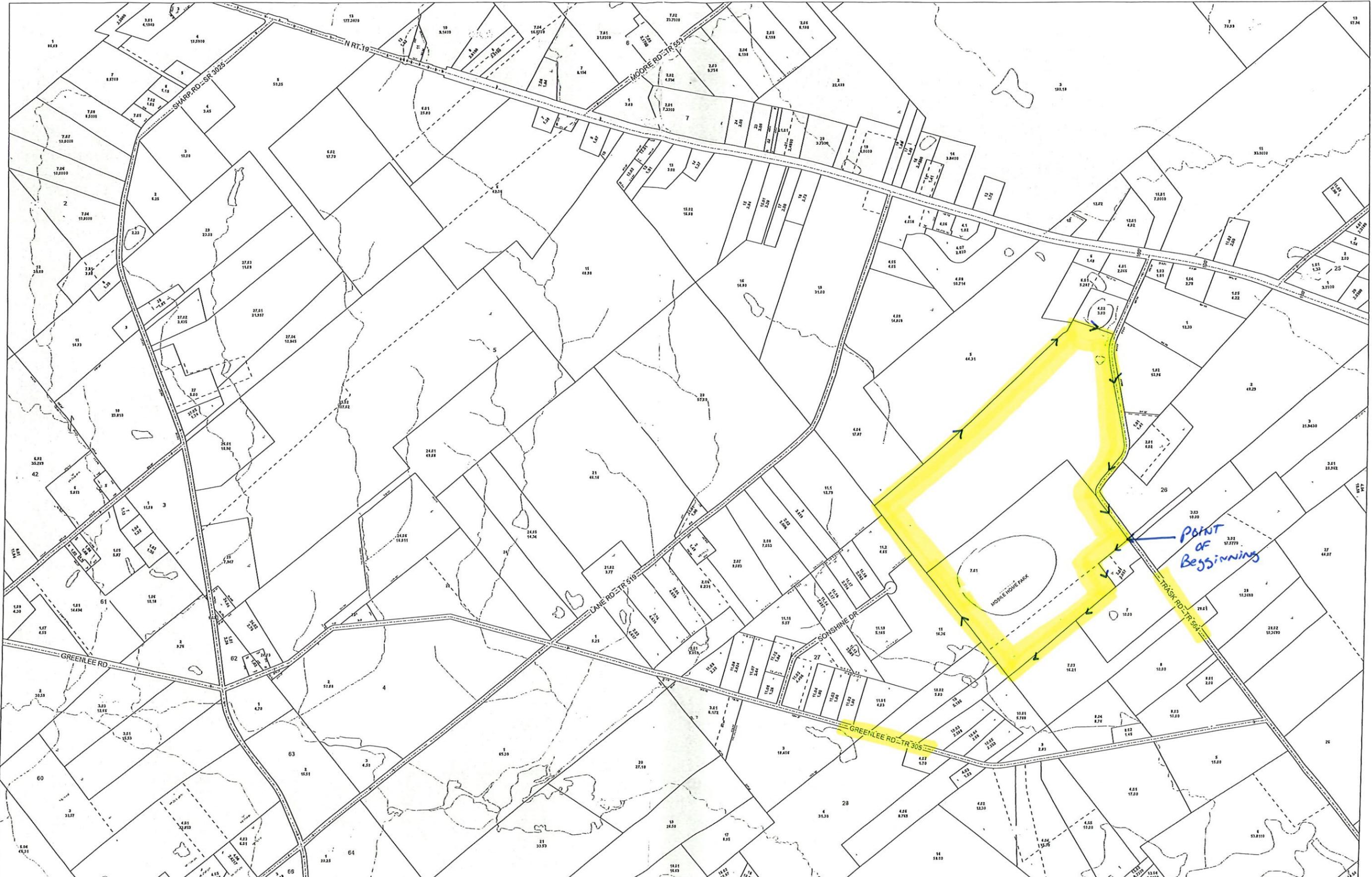
A-2. In the Application’s Section 7, Mainlines stated that the attached Exhibit A was a map showing the boundaries of most of the Requested Territory and that a metes and bounds description and a map of the Waypoint Territory would be filed as a supplement to the Application. However, Exhibit A did not include a metes and bounds description of the boundaries the Requested Territory and the identified supplement has not been filed with the Commission. Please provide a metes and bounds description by bearing angles and distances for each portion of the Requested Territory. This description must also quantify the area of each portion of the Requested Territory in acres.

**RESPONSE:** Please see attached documents titled “Map – Metes and bounds legal description – Girard Twp.” and “Metes and bounds legal description – Waterford Twp.”

**PROVIDED BY:** Stacy Luciano

**DATE:** October 3, 2024

**Maps for service area – Waterford Twp.**



Bureau of Assessment  
 Room 104  
 Erie County Courthouse  
 149 West 6th Street  
 Erie, PA 16501  
 814-451-6225

**Erie County, Pennsylvania**  
**WATERFORD TOWNSHIP Map 47-011**  
 Bureau of Assessment

PLOT DATE *Tuesday, March 31, 2015*  
 Scale: 1" = 400'  
**FOR TAX PURPOSES ONLY**

Tax Map Page Index	Tax Parcels	Stream Centerlines	Tracts	Parcel Number & Acreage
Road Centerlines	Original Lines	Political Boundary Lines	Water Bodies	Tract Number
Railroad Centerlines	Easements	District & Map Number	Block Number	Historic Lot Number
			Address Number	

S 85°32'11" E — 630.28'

N 04°27'49" E — 834'

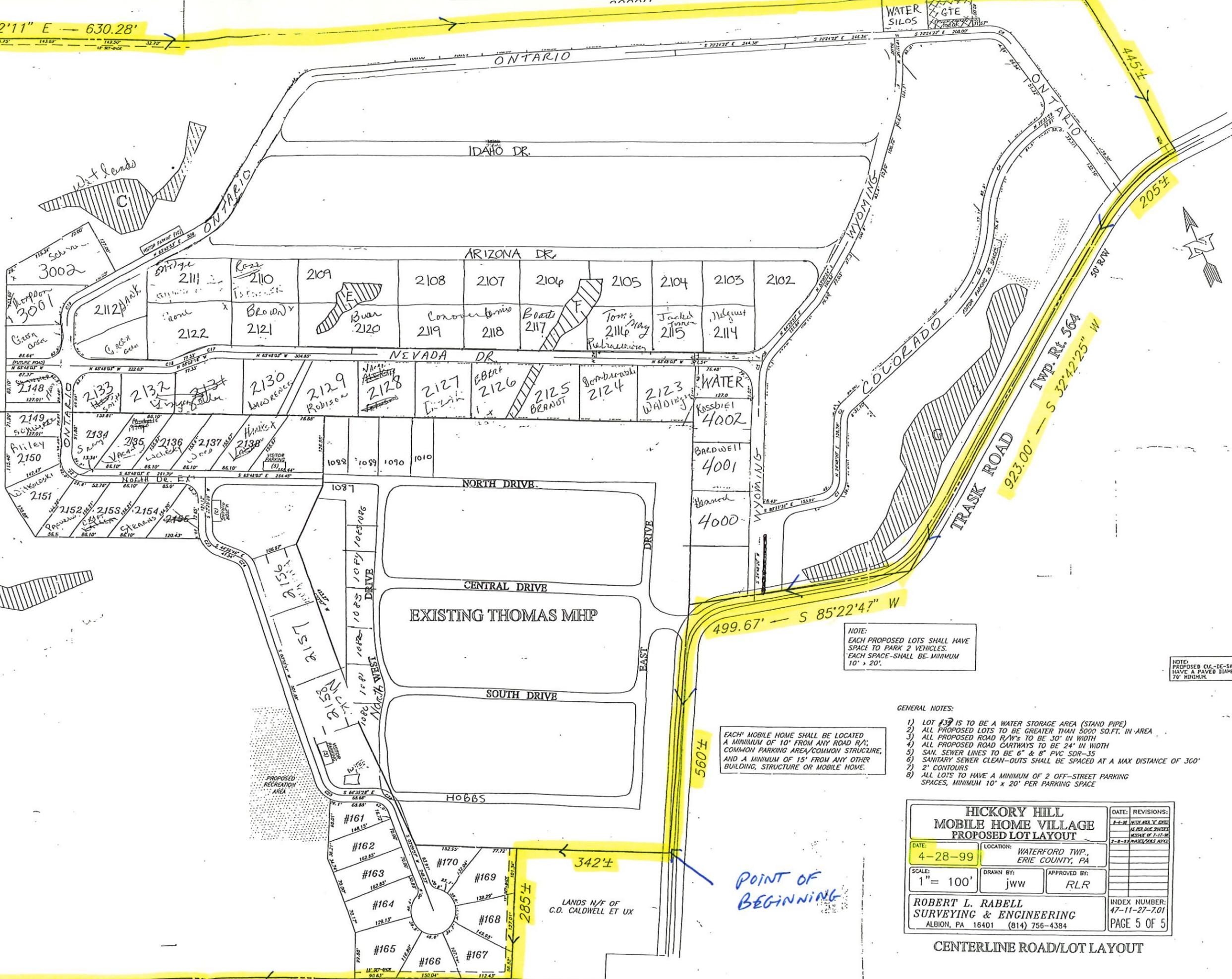
1282.4±

LANDS OF JOHN KOWALCZYK ET AL

N/F OF SITE ET UX

N/F OF SITE ET UX

PINE TREES DEBARS PLEASE TO BE USED FOR A BUFFER ZONE & SEDIMENTATION CONTROL



NOTE:  
EACH PROPOSED LOTS SHALL HAVE SPACE TO PARK 2 VEHICLES.  
EACH SPACE SHALL BE MINIMUM 10' x 20'.

NOTE:  
PROPOSED CUL-DE-SACS SHALL HAVE A PAVED DIAMETER OF 70' MINIMUM.

EACH MOBILE HOME SHALL BE LOCATED A MINIMUM OF 10' FROM ANY ROAD R/W, COMMON PARKING AREA, COMMON STRUCTURE, AND A MINIMUM OF 15' FROM ANY OTHER BUILDING, STRUCTURE OR MOBILE HOME.

- GENERAL NOTES:
- 1) LOT #39 IS TO BE A WATER STORAGE AREA (STAND PIPE)
  - 2) ALL PROPOSED LOTS TO BE GREATER THAN 5000 SQ.FT. IN AREA
  - 3) ALL PROPOSED ROAD R/W'S TO BE 30' IN WIDTH
  - 4) ALL PROPOSED ROAD CARTHWAYS TO BE 24' IN WIDTH
  - 5) SAN. SEWER LINES TO BE 6" & 8" PVC SDR-35
  - 6) SANITARY SEWER CLEAN-OUTS SHALL BE SPACED AT A MAX DISTANCE OF 300'
  - 7) 2' CONTOURS
  - 8) ALL LOTS TO HAVE A MINIMUM OF 2 OFF-STREET PARKING SPACES, MINIMUM 10' x 20' PER PARKING SPACE

<b>HICKORY HILL MOBILE HOME VILLAGE PROPOSED LOT LAYOUT</b>		DATE: 4-28-99	REVISIONS:
LOCATION: WATERFORD TWP., ERIE COUNTY, PA		SCALE: 1" = 100'	INDEX NUMBER: 47-11-27-7.01 PAGE 5 OF 5
DRAWN BY: jww		APPROVED BY: RLR	
ROBERT L. RABELL SURVEYING & ENGINEERING ALBION, PA 16401 (814) 756-4384			

CENTERLINE ROAD/LOT LAYOUT

**Map – Metes and bounds legal description – Girard Twp.**

**METES AND BOUNDS  
LEGAL DESCRIPTION FOR  
SERVICE AREA  
GIRARD TOWNSHIP, ERIE COUNTY, PENNSYLVANIA**

**ALL** that certain area of land situate in Girard Township, Erie County, Pennsylvania, as shown on Exhibit 1 and being more particularly bounded and described as follows:

**BEGINNING** at the southwesterly corner of the area herein described, at a point at the southwest corner of Tract 327 and in the line common to Girard Township and Girard Borough;

**#1** **THENCE** North 24° 22' 57" West along the westerly line of Tract 327 and line common to and dividing Girard Township and Girard Borough a distance of 826.78 feet to a point on said line at the southwesterly corner of Westgate Village Subdivision Section No. 6;

**#1A** **THENCE** along the southerly line of Westgate Village Subdivision Section No. 6 the following six (6) courses and distances:

North 65° 37' 16" East, a distance of 170 feet;  
North 24° 22' 44" West, a distance of 11.03 feet;  
North 65° 41' East, a distance of 410.90 feet;  
North 34° 51' 36" East, a distance of 126.13 feet;  
South 55° 08' 24" East, a distance of 25 feet;  
North 34° 51' 36" East, a distance of 170 feet to a point, being the southeasterly corner of Westgate Village Subdivision Section No. 6;

**THENCE** along the easterly line of Westgate Village Subdivision Section No. 5 the following seven (7) courses and distances:

North 16° 54' 54" West, a distance of 100 feet;  
North 0° 23' 03" West, a distance of 79.81 feet;  
North 17° 38' East, a distance of 150 feet;  
North 72° 22' West, a distance of 170 feet;  
North 17° 38' East, a distance of 120 feet;  
North 72° 22' West, a distance of 132.04 feet;  
South 65° 41' West, a distance of 264.92 feet;

**THENCE** along the easterly line of Westgate Village Subdivision, Section No. 4, Section No. 3, Section No. 2 and Section No. 1, North 24° 19' West, a distance of 1,406.00 feet to an iron survey point being the northeasterly corner of Westgate Village Subdivision Section No. 1;

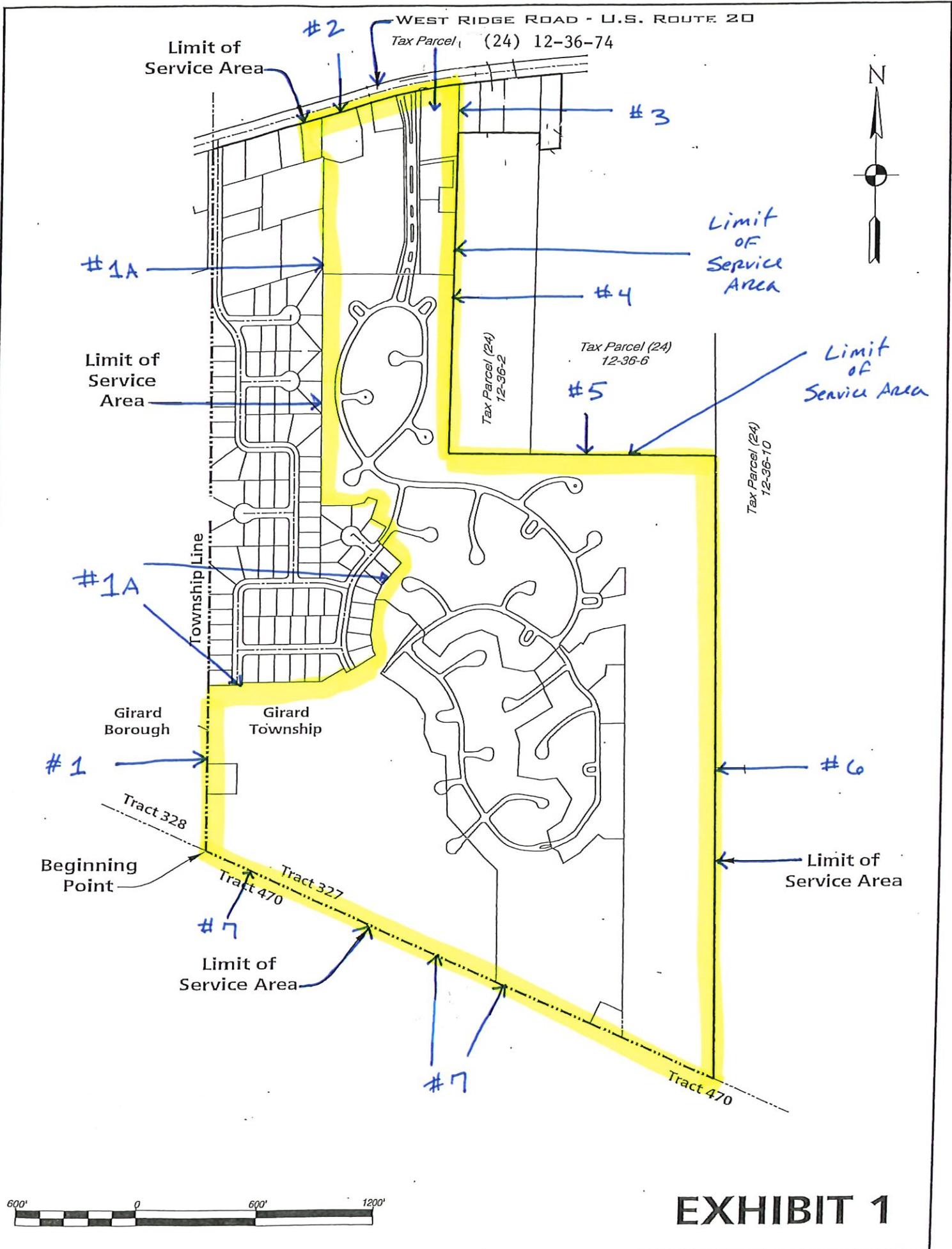
**THENCE** continuing North 24° 19' West, a distance of 467 feet, more or less, to a point;

**THENCE** South 49° 52' 38" West, a distance of 90 feet to a point;

**THENCE** North 24° 22' 44" West, a distance of 230 feet to a point in the southerly right-of-way line of West Ridge Road a/k/a U.S. Route 20 (an 80 foot wide right-of-way);

**#2** **THENCE** easterly along the southerly right-of-way line of West Ridge Road North 49° 54' 00" East and then curving to the right and going North 60° 58' 30" East a total distance of 908.50 feet, more or less, to the northeasterly corner of tax parcel (24) 12-36-74;

- #3** **THENCE** South 22° 55' 30" East along the easterly line of tax parcel (24) 12-36-74, a distance of 300 feet more or less to a point; being the northwesterly corner of tax parcel (24) 12-36-2;
- #4** **THENCE** South 22° 55' 30" East along the westerly line of tax parcel (24) 12-36-2, a distance of 1,614 feet more or less to a point;
- #5** **THENCE** North 66° 57' 33" East along the southerly line of tax parcel (24) 12-36-2 and tax parcel (24) 12-36-6, a distance of 1,353.07 feet more or less to a point in the westerly line of tax parcel (24) 12-36-10;
- #6** **THENCE** South 24° 51' 18" East along the westerly line of tax parcel (24) 12-36-10, a distance of 3,134.40 feet more or less to a point in the northerly line of Tract 470;
- #7** **THENCE** North 89° 36' 39" West along the northerly line of Tract 470, a distance of 695.47 feet more or less and thence continuing along the northerly line of Tract 470 North 89° 38' 00" West a distance of 2,157.53 feet more or less to the Place of Beginning.



**Metes and bounds legal description – Waterford Twp.**

**Metes and Bounds Legal Description for Service Area for  
Hickory Hill Mobile Home Park, Waterford, PA**

**ALL** that certain area of land situate in the Township of Waterford, County of Erie and Commonwealth of Pennsylvania, bounded and described as follows:

**BEGINNING** at a point in the westerly line of Trask Road a/k/a Township Route 564 (a 50 foot right-of-way) said point of beginning being the northeasterly corner of lands now or formerly of Craig D. Caldwell et ux as described in Erie County Record Book 342, page 2244, and said point of beginning being the southeasterly corner of the herein described premises;

**THENCE** North 81° 51' 20" West along the northerly line of lands now or formerly of Craig D. Caldwell et ux, a distance of 342.18 feet to a set ¾ inch iron survey point;

**THENCE** South 07° 58' 29" West, a distance of 284.86 feet to a set ¾ inch iron survey point;

**THENCE** North 84° 00' 31" West, a distance of 1,398.40 feet to a point;

**THENCE** North 04° 27' 49" East, a distance of 1,282.40 feet to a point;

**THENCE** continuing North 04° 27' 49" East, a distance of 834.01 feet to a point;

**THENCE** South 85° 32' 11" East, a distance of 630.28 feet to a point;

**THENCE** South 87° 45' 46" East, a distance of 133.15 feet to a point;

**THENCE** South 89° 42' 12" East, a distance of 1,529.16 feet to a point;

**THENCE** South 07° 04' 38" East, a distance of 6.23 feet to a point;

**THENCE** South 82° 15' 13" East, a distance of 35.62 feet to a point;

**THENCE** North 74° 03' 02" East, a distance of 88.78 feet to a found iron survey point;

**THENCE** North 72° 29' 03" East, a distance of 32.28 feet to a found iron pipe;

**THENCE** South 26° 51' 19" East, a distance of 446.76 feet to a point in the centerline line of Trask Road a/k/a Township Route 564 (a 50 foot right-of-way);

**THENCE** South 67° 38' 32" West along the centerline of Trask Road, a distance of 22.17 feet to a point;

**THENCE** along a curve to the left along the centerline of Trask Road, with a delta of 34° 56' 07" and a curve radius of 356.00 feet, an arc length of 217.07 feet, and chord bearing South 50° 10' 28" West a chord length of 213.72 feet to a point in the centerline of Trask Road;

**THENCE** continuing along the centerline of Trask Road, South 32° 42' 25" West, a distance of 923.00 feet to a point in the centerline of Trask Road;

**THENCE** continuing along the centerline of Trask Road, South 85° 22' 47" West, a distance of 499.67 feet to a point in the centerline of Trask Road;

**THENCE** continuing along the centerline of Trask Road, South 07° 58' 29" West, a distance of 560.00 feet, more or less, to the point and place of beginning.

**CONTAINING** approximately 108.79 +/- acres of land, more or less.

**VERIFICATION**

I, Stacy Luciano, Manager of Mainlines, Manholes & Wastewater Treatment Inc., 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).

  
Stacy Luciano, Manager

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

### BY EMAIL ONLY

Patrick Cicero  
Office of Consumer Advocate  
555 Walnut Street  
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Allison Kaster  
Grant Rosul  
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400 North Street  
[akaster@pa.gov](mailto:akaster@pa.gov)  
[grosul@pa.gov](mailto:grosul@pa.gov)

*/s/ Whitney E. Snyder*

\_\_\_\_\_  
Whitney E. Snyder  
Aaron D. Rosengarten

Dated this 3<sup>rd</sup> day of October, 2024