



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

October 28, 2024

Via Electronic Filing

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

Re: Pennsylvania Public Utility Commission,
Bureau of Investigation and Enforcement v.
Conneaut Lake Park Water Corporation, Inc.
Docket Nos. P-2024-
I-2024-

**I&E Petition to Request the Commission Open a Section 529 Investigation
into the Acquisition of Conneaut Lake Park Water Corporation, Inc.**

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Bureau of Investigation & Enforcement's (I&E) **Petition to Request the Commission Open a Section 529 Investigation into the Acquisition of Conneaut Lake Park Water Corporation, Inc.** for the above-captioned proceeding.

I&E respectfully requests that an I-Docket be opened as requested in the I&E Petition and that the I-Docket then be forwarded to the Office of Administrative Law Judge for further prosecution.

Copies are being served on parties of record per the attached Certificate of Service. Should you have any questions, please do not hesitate to contact me.

Sincerely,

Michael A. Podskoch, Jr.
Prosecutor
Bureau of Investigation and Enforcement
PA Attorney ID No. 330132
(717) 783-6151
mpodskoch@pa.gov

Enclosures

cc: Per Certificate of Service
Eranda Vero, Esq., Administrative Law Judge (*via email - evero@pa.gov*)
Arlene Ashton, Esq., Administrative Law Judge (*via email - aashton@pa.gov*)
Teri-Lee Rhoades, Esq., Mediator (*via email - terhoades@pa.gov*)
Office of Special Assistants (*via email - ra-osa@pa.gov*)
David Screven, Esq., Chief Counsel PUC Law Bureau (*via email - dscreven@pa.gov*)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement	:	
Petitioner	:	
	:	
v.	:	Docket Nos. P-2024-
	:	I-2024-
Conneaut Lake Park Water Corporation, Inc.	:	
Respondent	:	

**PETITION TO REQUEST THE COMMISSION
OPEN A SECTION 529 INVESTIGATION
INTO THE ACQUISITION OF
CONNEAUT LAKE PARK WATER CORPORATION, INC.**

AND NOW, comes the Pennsylvania Public Utility Commission (“Commission”), by and through its Bureau of Investigation and Enforcement (“I&E”), to petition the Commission pursuant to Sections 5.1 and 5.41 of Commission Regulations¹ to open a Section 529² investigation into whether the Commission should order a capable public utility to acquire Conneaut Lake Park Water Corporation, Inc. (“CLPWC”). In support of this Petition, I&E avers the following:

¹ 52 Pa. Code §§ 5.1 and 5.41.

² 66 Pa. C.S. § 529.

I. PARTIES

1. The Pennsylvania Public Utility Commission with a mailing address of Commonwealth Keystone Building, Harrisburg, PA 17105, is a duly constituted agency of the Commonwealth of Pennsylvania empowered to regulate public utilities within the Commonwealth pursuant to the Public Utility Code, 66 Pa. C.S. §§ 101-3316.

2. Petitioner is the Commission's Bureau of Investigation and Enforcement and is the entity established to prosecute actions involving certificated public utilities pursuant to 66 Pa. C.S. § 308.2(a)(11)-(12); *See also Implementation of Act 129 of 2008; Organization of Bureaus and Offices*, Docket No. M-2008-2071852 (Order entered August 11, 2011) (delegating authority to initiate proceedings that are prosecutorial in nature to I&E).

3. Petitioner's counsel is:

Michael A. Podskoch, Jr.
Prosecutor
PA Attorney ID No. 330132
mpodskoch@pa.gov
(717) 783-6151

On Behalf of:

Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

4. Respondent, Conneaut Lake Park Water Corporation, Inc., is a "public utility" as that term is defined under Section 102 of the Public Utility Code³ as it is engaged in providing

³ A "public utility" is defined under 66 Pa. C.S. § 102 as:

(1) Any person or corporation now or hereafter owning or operating in this Commonwealth equipment or facilities for:

...

(ii) Diverting, developing, pumping, impounding, distributing, or furnishing water to or for the public for compensation.

water service to the public pursuant to the Certificate of Public Convenience issued by the Commission and identified *infra*.

5. The following certificated public utility is currently owned and operated by Todd Joseph and subject to this Petition:

A. Conneaut Lake Park Water Corporation, Inc., Utility Code 2125112

6. According to Commission records, the certificated public utility owned and operated by Todd Joseph has a registered address of 713 Broad Acres Road, Narbeth, PA 19702.

II. JURISDICTION

7. The Commission has jurisdiction over this matter pursuant to Section 501 of the Public Utility Code which authorizes and obligates the Commission to execute and enforce the provisions of the Public Utility Code.⁴

8. Section 1501 of the Public Utility Code states that every public utility shall furnish and maintain adequate, efficient, and reasonable service and facilities and that such service shall be reasonably continuous and without unreasonable interruptions or delay.⁵

9. Chapter 52, Section 5.41 of the Pennsylvania Code allows a party to seek relief under the Public Utility Code by petition.⁶

10. Section 529 of the Public Utility Code authorizes the Commission, after notice and opportunity to be heard, to order a capable public utility to acquire a small water or sewer utility.⁷

11. Respondent, in providing water service for compensation, is subject to the power and authority of this Commission pursuant to Section 501(c) of the Public Utility Code which

⁴ 66 Pa. C.S. § 501.

⁵ 66 Pa. C.S. § 1501.

⁶ 52 Pa. Code § 5.41.

⁷ 66 Pa. C.S. § 529(a).

requires a public utility to comply with the Public Utility Code and Commission regulations and orders.⁸

12. Pursuant to the provisions of the applicable Commonwealth statutes and regulations, the Commission has jurisdiction over the subject matter of this Petition and the actions of Respondent related thereto.

III. BACKGROUND

13. CLPWC is a small water utility as defined under Section 529⁹ that provides water service to approximately 162 residential customers, both annual and seasonal, and 3 commercial customers in Conneaut Lake, Pennsylvania.¹⁰

14. CLPWC's water system has been a part of Conneaut Lake Park amusement park and was previously managed by an entity known as the Trustees of Conneaut Lake Park, Inc. ("Trustees").¹¹

15. The park was the subject of a 2014 bankruptcy proceeding in the United States Bankruptcy Court for the Western District of Pennsylvania.¹²

16. On December 17, 2020, the Trustees entered into a Sales Agreement with Keldon Holdings, LLC ("Keldon") for the sale of the park's assets, including the water system.¹³ Todd Joseph is the owner of Keldon Holdings, LLC.¹⁴

17. On March 2, 2021, the Bankruptcy Court entered an Order approving the sale to Keldon.¹⁵ Subsequently, Keldon transferred the water system assets to CLPWC, an entity also

⁸ 66 Pa. C.S. § 501(c).

⁹ 66 Pa. C.S. § 529(m) defines a "small water utility" as "[a] public utility which regularly provides water service to 1,200 or fewer customer connections."

¹⁰ Supplement No. 1 to Tariff – Water Pa. P.U.C. No. 1, Docket No. R-2023-3041575, Statement of Reasons, p. 2.

¹¹ Recommended Decision, Docket Nos. A-2022-3031711 & A-2022-3031712, pp. 7-8.

¹² *Id.* at p. 9.

¹³ *Id.* at p. 11.

¹⁴ *Id.* at p. 6.

¹⁵ *Id.* at p. 11.

acquired by Keldon as part of the assets of the sale, which had been previously formed solely to own, operate, and improve the water system.¹⁶

18. On March 31, 2022, the Trustees and CLPWC filed a Joint Application for Issuance of a Certificate of Public Convenience and Abandonment.¹⁷

19. On April 20, 2023, the Commission entered an Order approving (1) the transfer of the water system's assets to Keldon, (2) the issuance of a Certificate of Public Convenience to CLPWC, and (3) the Trustees' abandonment of service.¹⁸

20. The April 20, 2023 Order also required that, at the time of filing its next base rate case or no later than three years from the issuance of the Certificate of Public Convenience, CLPWC shall finalize and submit a proposed metering program.¹⁹

21. On August 31, 2023, CLPWC filed proposed Supplement No. 1 to Tariff – Water Pa. P.U.C. No. 1 to become effective October 31, 2023.²⁰ The filing contained proposed changes in rates, rules, and regulations calculated to produce \$257,797 in additional annual revenues, resulting in a 970.8% increase.²¹ CLPWC's previous tariff was issued on June 29, 2009 and had not been modified since.²²

¹⁶ *Id.* at p. 17.

¹⁷ *Id.* at pp. 1-2.

¹⁸ *Joint Application of Trustees of Conneaut Lake Park, Inc. and Conneaut Lake Park Water Corporation, Inc., under Section 1102(a) of the Pennsylvania Public Utility Code, 66 Pa. C.S. § 1102(a)*, Docket Nos. A-2022-3031711 & A-2022-3031712, pp.1-2 (Order Entered April 20, 2023).

¹⁹ *Joint Application of Trustees of Conneaut Lake Park, Inc. and Conneaut Lake Park Water Corporation, Inc., under Section 1102(a) of the Pennsylvania Public Utility Code, 66 Pa. C.S. § 1102(a)*, Docket Nos. A-2022-3031711 & A-2022-3031712, pp.2-3 (Order Entered April 20, 2023).

²⁰ Suspension Order, Docket No. R-2023-3041575, p. 1 (Order Entered October 19, 2023).

²¹ *Id.*

²² Recommended Decision, Docket Nos. A-2022-3031711 & A-2022-3031712, p. 13.

22. Simultaneously with the base rate filing (“rate case”), CLPWC filed a Petition for Approval of a Metering Exception (“metering petition”) alleging that it had met the Commission’s criteria to qualify for an exemption from the metering requirement.²³

23. The parties to the rate case included: CLPWC, I&E, the Office of Consumer Advocate (“OCA”), the Office of Small Business Advocate (“OSBA”), several individual customers, and approximately 67 Conneaut Lake residents (“Conneaut Lake Objectors”) represented by Joshua D. Brown, Esquire.

24. On October 13, 2023, the Conneaut Lake Objectors filed a Complaint in opposition to the proposed rate increase.

25. The Conneaut Lake Objectors alleged that Mr. Joseph sent retaliatory text messages to customers following their opposition to the rate filing and threatened to discontinue water service in violation of 66 Pa. C.S. § 1501 (regarding character of service and facilities) and 66 Pa. C.S. § 1502 (regarding discrimination in service). *See* Conneaut Lake Objectors Complaint attached hereto as Exhibit “A.”

26. On October 19, 2023, the Commission entered an Order suspending the implementation of the proposed rates by operation of law until May 31, 2024, and opening an investigation into the lawfulness, justness, and reasonableness of the proposed rates, rules, and regulations contained therein.²⁴

27. On October 26, 2023, a telephonic Prehearing Conference was held during which the rate case and the metering petition were consolidated.²⁵ Additionally, the parties agreed to

²³ Petition of Conneaut Lake Park Water Corporation, Inc. for Approval of a Metering Exception, Docket No. P-2023-3042648.

²⁴ Suspension Order, Docket No. R-2023-3041575, p. 2 (Order Entered October 19, 2023).

²⁵ Prehearing Order No. 1, Docket No. R-2023-3041575, p. 3 (Order Entered November 8, 2023).

engage in mediation and CLPWC elected to extend the statutory suspension period by 60 days, until July 30, 2024, in order to accommodate mediation proceedings.²⁶

28. During the course of the rate case, I&E confirmed that CLPWC has been in violation of the following Commission Regulations and provisions of the Public Utility Code:

- A. CLPWC does not maintain a customer complaint log in accordance with 52 Pa. Code § 65.3 regarding complaints. *See* CLPWC’s response to OCA Interrogatories Set I, Question 15 attached hereto as Exhibit “B.”
- B. CLPWC does not investigate billing or water quality disputes in accordance with 52 Pa. Code § 56.151(2) regarding dispute investigations. *See* CLPWC’s response to the Commission’s Bureau of Technical Utility Services (“TUS”) Data Requests Set 1, Question 23 attached hereto as Exhibit “C.”
- C. CLPWC’s residential customers are not metered in accordance with 52 Pa. Code § 65.7.²⁷ *See* CLPWC’s response to OCA Interrogatories Set I, Question 29 attached hereto as Exhibit “D.”
- D. CLPWC’s commercial customers are metered but CLPWC does not test or maintain these meters in accordance with 52 Pa. Code § 65.8 regarding meters. *See* CLPWC’s responses to TUS Data Requests Set I, Questions 17, 19, and 25 attached hereto as Exhibit “E.”
- E. CLPWC does not segregate its revenues, expenses, and property from non-utility businesses in accordance with 66 Pa. C.S. § 1311(c) regarding segregation of property. *See* CLPWC’s responses to I&E Interrogatories Set RB, Questions 1 and 2 attached hereto as Exhibit “F.”
- F. CLPWC does not maintain a system of accounts in accordance with 66 Pa. C.S. § 1701 and 52 Pa. Code § 65.16 regarding system of accounts.

²⁶ *Id.* at p. 2.

²⁷ As a certificated public utility, CLPWC is required under 52 Pa. Code § 65.7(a) “to furnish metered service.” 52 Pa. Code § 65.7(b) provides that “[u]nless otherwise authorized by the Commission, a public utility furnishing metered service shall provide; install at its own expense; and continue to own, maintain and operate all meters.” Under 52 Pa. Code § 65.7(d), CLPWC is required to “provide a meter to each of its water customers . . . and shall furnish water service . . . exclusively on a metered basis” Additionally, the Commission’s April 20, 2023 Order required CLPWC to submit a proposed metering program at the time of filing its next base rate case. Notwithstanding the filing and disposition of the metering petition, CLPWC’s failure to submit a proposed metering program is in violation of the Commission’s April 20, 2023 Order and its current lack of residential metering is in violation of Commission regulations.

- G. CLPWC does not follow termination procedures in accordance with 52 Pa. Code §§ 56.81-56.131 regarding termination of service and 52 Pa. Code §§ 56.140-56.181 regarding disputes, termination disputes, and informal and formal complaints.
- H. CLPWC does not maintain written or recorded disputes and complaints regarding service terminations and reconnections in accordance with 52 Pa. Code § 56.202 regarding record maintenance.

29. In-person and telephonic public input hearings were held on December 7, 2023 during the rate case.

30. At both hearings, many customers testified about customer service issues,²⁸ water quality issues,²⁹ the poor state of the water system,³⁰ and Mr. Joseph's retaliatory and threatening communications with customers.³¹

31. During the evening hearing, several customers testified that they were charged tapping fees to connect their residences to the water system.³² CLPWC stated that it has no record of charging tapping fees. *See* CLPWC's response to I&E Interrogatories Set RB, Question 3 attached hereto as Exhibit "G."³³

32. On December 14, 2023, CLPWC voluntarily extended the statutory suspension period by an additional 47 days, until September 13, 2024, in order to accommodate further mediation proceedings.³⁴

²⁸ Hrg. Tr. 12/7/2023 1:05 p.m., Docket No. R-2023-3041575, pp. 97-98, 102-103, 113, 115, 129, 131, 135-137, 140, 143-144, 149, 164-167; Hrg. Tr. 12/7/2023 6:03 p.m., Docket No. R-2023-3041575, pp. 209-211, 217, 247-248, 272-274, 281.

²⁹ *Id.* at pp. 72-73, 75, 77-79, 80-82, 88-91, 95, 101, 103, 105-106, 108, 110-111, 127-128, 140, 146, 149-151, 157-158, 161, 164-165; *Id.* at pp. 209-211, 217, 221, 238, 240, 244-246, 251-254, 256-257, 260, 266, 271, 273, 280-283.

³⁰ *Id.* at pp. 77-79, 82-83, 88, 91-92, 107-108, 114, 123-126, 142, 149-150, 152, 154, 158-160, 162, 166; *Id.* at p. 266.

³¹ Hrg. Tr. 12/7/2023 1:05 p.m. at pp. 71-72, 74, 118-120, 168.

³² Hrg. Tr. 12/7/2023 6:03 p.m. at pp. 237, 241-242, 257-259, 262, 280, 284-285.

³³ As the rate case reached disposition through settlement, this factual discrepancy was not adjudicated. I&E notes that the Commission prohibits public utilities from collecting such fees. *See Dr. Tod A. Wirtz v. High Meadows Sewer Service and John M. Stilley & Grego Sinkevich v. Dale H. Winters*, Docket Nos. C-00945830 & C-00945840 (Order Entered April 5, 1995).

³⁴ Prehearing Order No. 2, Docket No. R-2023-3041575, p. 2 (Order Entered December 20, 2023).

33. On January 12, 2024, CLPWC again voluntarily extended the statutory suspension period by an additional 56 days, until November 8, 2024, in order to accommodate further mediation proceedings.³⁵

34. The mediation proceedings culminated in a Settlement among the parties. The Settlement contained certain provisions wherein I&E agreed to initiate a Section 529 proceeding no later than three months after entry of a Commission Order and CLPWC reserved the right to challenge the acquisition and present evidence proving its ability to render adequate, efficient, safe and reasonable service at just and reasonable rates.³⁶

35. Pursuant to the terms of the aforementioned Settlement, I&E has filed the instant petition.

36. As noted in previous cases before the Commission, the water system has a very long history of financial struggles, fiduciary mismanagement, poor record keeping and other managerial mismanagement.³⁷

37. All parties to the rate case agreed that it is in the public interest to initiate a Section 529 proceeding for CLPWC.³⁸

38. The following potential capable proximate water service providers received a copy of this Petition as per the Certificate of Service:

- A. Aqua Pennsylvania, Inc.;**
- B. Municipal Authority of Conneaut Lake;**
- C. Conneaut Lake Joint Municipal Authority;**

³⁵ Prehearing Order No. 3, Docket No. R-2023-3041575, p. 2 (Order Entered January 31, 2024).

³⁶ Joint Petition for Approval of Settlement of Rate Proceeding, Docket Nos. R-2023-3041575 & P-2023-3042648, p. 13, ¶ G.51.

³⁷ Recommended Decision, Docket Nos. A-2022-3031711 & A-2022-3031712, p. 21; Supplement No. 1 to Tariff – Water Pa. P.U.C. No. 1, Docket No. R-2023-3041575, Statement of Reasons, p. 2.

³⁸ Recommended Decision, Docket Nos. R-2023-3041575 & P-2023-3042648, p. 50.

- D. Meadville Area Water Authority;**
- E. Vernon Township Water Authority;**
- F. Jamestown Municipal Water and Sewer Authority;**
- G. Greenville Water Authority;**
- H. Reynolds Water Company;**
- I. Linesville Municipal Water Authority; and**
- J. Saegertown Water Department**

39. In consideration of all the above, I&E believes that it is appropriate for the Commission to initiate a Section 529 investigation regarding Conneaut Lake Park Water Corporation, Inc.

WHEREFORE, for all the foregoing reasons, the Bureau of Investigation and Enforcement of the Pennsylvania Public Utility Commission respectfully requests:

- 1) that an investigation pursuant to 66 Pa. C.S. § 529 be initiated to determine whether the Commission shall order a capable public utility to acquire Conneaut Lake Park Water Corporation, Inc.;
- 2) that the Secretary’s Bureau open an I-Docket for purposes of prosecuting the Section 529 proceeding;
- 3) that this case be assigned to the Commission’s Office of Administrative Law Judge for the scheduling of such hearings as may be necessary culminating in the issuance of a recommended decision;
- 4) that the Commission’s Bureau of Investigation and Enforcement is expected to participate in the investigation proceeding;
- 5) that water utilities with an interest in this matter may petition to participate as appropriate;
- 6) that the Commission consider whether a receiver be appointed for Conneaut Lake Park Water Corporation, Inc. pursuant to 66 Pa. C.S. § 529(g);³⁹ and

³⁹ 66 Pa. C.S. § 529(g) provides that “[t]he commission may, in its discretion, appoint a receiver to protect the interests of the customers of the small water or sewer utility.”

7) any other such relief that the Commission deems appropriate.

Respectfully submitted,

A handwritten signature in cursive script that reads "Michael Podskoch".

Michael A. Podskoch, Jr.
Prosecutor
PA Attorney ID No. 330132

Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
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(717) 783-6151

Date: October 28, 2024

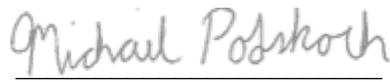
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement	:	
Petitioner	:	
	:	
v.	:	Docket Nos. P-2024-
	:	I-2024-
Conneaut Lake Park Water Corporation, Inc.	:	
Respondent	:	

VERIFICATION

I, Michael A. Podskoch, Jr., hereby state that the facts set forth in the foregoing document, **Petition to Request the Commission Open a Section 529 Investigation into the Acquisition of Conneaut Lake Park Water Corporation, Inc.**, 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 any hearing. I understand that the statements made herein are subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

October 28, 2024
Date



Signature

I&E Exhibit A

DILLON MCCANDLESS KING COULTER & GRAHAM L.L.P.

ATTORNEYS AT LAW

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October 13, 2023

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

RE: *Pennsylvania Public Utility Commission v. Conneaut Lake Park Water Corporation, Inc.*

Docket No.: [REDACTED] R-2023-3041575-AEL-10/17/23

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Formal Complaint and Public Statement filed on behalf of Rhonda Jaquay, et al., "Conneaut Lake Objectors," in the above-referenced proceeding.

Sincerely,

DILLON MCCANDLESS KING COULTER & GRAHAM, L.L.P.

/s/Joshua D. Brown

Joshua D. Brown, Esquire

Enclosure

cc: Office of Administrative Law Judge: (via email only: crainey@pa.gov)
Office of Special Assistants (via email only: ra-OSA@pa.gov)
Sean Donnelly, TUS (via email only: sdonnelly@pa.gov)
Harrison W. Breitman, Esquire (via email only: hbreitman@paoca.org)
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility : **Docket No. R-2023-3041575**
Commission v. Conneaut Lake Park :
Water Corporation, Inc. :
:

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served via email (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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Advocate*

DATE: October 13, 2023

/s/ Joshua D. Brown

Joshua D. Brown
Attorney ID No. 315339

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility : **Docket No. R-2023-3041575**
Commission v. Conneaut Lake Park :
Water Corporation, Inc. :
:

**COMPLAINT OF THE
CONNEAUT LAKE OBJECTORS¹**

1. The Complainants are:
 - i. Rhonda Jaquay
10807 Woodland Avenue
Conneaut Lake, PA 16316
 - ii. Phil Armstrong
10987 Henry St
Conneaut Lake, PA 16316
 - iii. David and Jacki Arrigo
10861 Utley Ave
Conneaut Lake, PA 16316
 - iv. Joseph and Lydia Batcha
10901 Lake Front St
Conneaut Lake, PA 16316
 - v. Patricia Bellan
12641 Comstock St
Conneaut Lake, PA 16316
 - vi. Thomas Borner
12305 Center St
Conneaut Lake, PA 16316
 - vii. David Cherry
12375 Lake St
Conneaut Lake, PA 16316

¹ The “Conneaut Lake Objectors” are those listed in response to Section 1.

- viii. Tammy Claypoole
10869 Brown St
Conneaut Lake, PA 16316
- ix. Marion Dantzler
12546 Center St
Conneaut Lake, PA 16316
- x. Dan DiMucci
12596 Comstock St
Conneaut Lake, PA 16316
- xi. Charles Duboy
12562 Comstock St
Conneaut Lake, PA 16316
- xii. Tracey Eiler
10925 Lake Front St
Conneaut Lake, PA 16316
- xiii. Robert Eiler
12544 N Lake Front St
Conneaut Lake, PA 16316
- xiv. Jerry Giger
10936 Henry St
Conneaut Lake, PA 16316
- xv. Julie Laeder
12549 Comstock St.
Conneaut Lake, PA 16316
- xvi. Scott and Christine Herman
12288 Comstock St
Conneaut Lake, PA 16316
- xvi. Alexander Hilliard
12545 Comstock St
Conneaut Lake, PA 16316
- xvii. Paul Hohman
12645 Comstock St
Conneaut Lake, PA 16316
- xviii. Diana Hoover
12608 Comstock St

Conneaut Lake, PA 16316

- xix. Paul Hoyson
10911 Lake Front St
Conneaut Lake, PA 16316
- xx. Russell and Kara Huffmyer
12220 Cosmtock St
Conneaut Lake, PA 16316
- xxi. Timothy Bradburn
10807 Woodland Avenue
Conneaut Lake, PA 16316
- xxii. James Kearns
12554 Comstock St
Conneaut Lake, PA 16316
- xxiii. Frank Lang
12124 Center St W.
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- xxiv. John Luca
11006 Keppler Ave
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- xxv. William Lucot
12572 Comstock St
Conneaut Lake, PA 16316
- xxvi. George Malloy
12563 Comstock St
Conneaut Lake, PA 16316
- xxvii. Andrew Matthew III
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Conneaut Lake, PA 16316
- xxviii. Melissa Maxwell
10944 Henry St
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- xxix. Karen Memmo
110656 Henry St
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- xxxi. Mark Popovich
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- xxxii. Robert Santora, MD
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- xxxiii. David and Heather Shean
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- xxxiv. Douglas Stanton
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- xxxv. Dave Toner
12172 Center St W.
Conneaut Lake, PA 16316
- xxxvi. Ed Wagner, Jr.
12106 Lake Front St
Conneaut Lake, PA 16316
- xxxvii. Richard Wallace
12321 Center St
Conneaut Lake, PA 16316
- xxxviii. Mary Webber
11043 Henry St
Conneaut Lake, PA 16316
- xxxviii. Thomas Wyant
12513 Comstock St
Conneaut Lake, PA 16316
- xxxix. Gerald Baldwin
12302 Comstock St
Conneaut Lake, PA 16316
- xxxx. Arlene Eakin
11020 Kepler Avenue

Conneaut Lake, PA 16316

xxxxi. Conrad Eckert
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Conneaut Lake, PA 16316

xxxixiii. Gary Slater
11016 Kepler Ave.
Conneaut Lake, PA 16316

xxxxiv. Glenn Ott
12597 Comstock St
Conneaut Lake, PA 16316

xxxxv. Mary Anne Napiecek
12435 Lake Street
Conneaut Lake, PA 16316

xxxxvi. Edward Grieser
12564 North Lake Front
Conneaut Lake, PA 16316

xxxxvii. Glenn and Maryann Kerr
12597 Comstock St,
Conneaut Lake, PA 16316

xxxxviii. Larry and Judy Hartung
12499 Comstock St
Conneaut Lake, PA 16316

2. The name and address of the Complainant's attorney is:

Joshua D. Brown
Dillon McCandless King Coulter
& Graham, LLP
128 West Cunningham Street
Butler, PA 16001
(724) 283-2200
jbrown@dmkcg.com

3. The respondent utility is:

Conneaut Lake Water Corp., Inc.
713 Broad Acres Road

Narbeth, PA 19072

4. The Complainants are members of the Conneaut Lake community, customers of the Respondent and have been provided the attached Notice with a deadline to file Formal Complaints by October 31, 2023. See Notice attached hereto as **Exhibit A**.

5. This Complaint is filed against the rates, terms and other provisions of Supplement No. 1 to Tariff Water-Pa. P.U.C. No. 1, which was filed on August 31, 2023, by Conneaut Lake Water Corporation, Incorporated (“Conneaut” or the “Company”). The proposed Tariff, if approved by the Commission, would increase the total distribution revenues of Citizens’ by \$257,797 per year, a 970.8% increase in annual distribution revenues. After preliminary review of the materials filed by the Company in support of the proposed Supplement, Complainants believe, and therefore aver, that those materials may be insufficient to justify the rate increase requested and that the Company’s present and proposed rates, rules, and conditions of service may be unjust, unreasonable, unduly discriminatory, and otherwise contrary to law, particularly as they pertain to residences and for all the reasons stated within the attached Statement of the Conneaut Lake Objectors.

6. More specifically, the Company is proposing increasing its flat consumption charge for year-round residential customers from \$14.39 per month to \$122.30 per month, or \$43.18 per quarter to \$366.90 per quarter, an 849.9% increase.

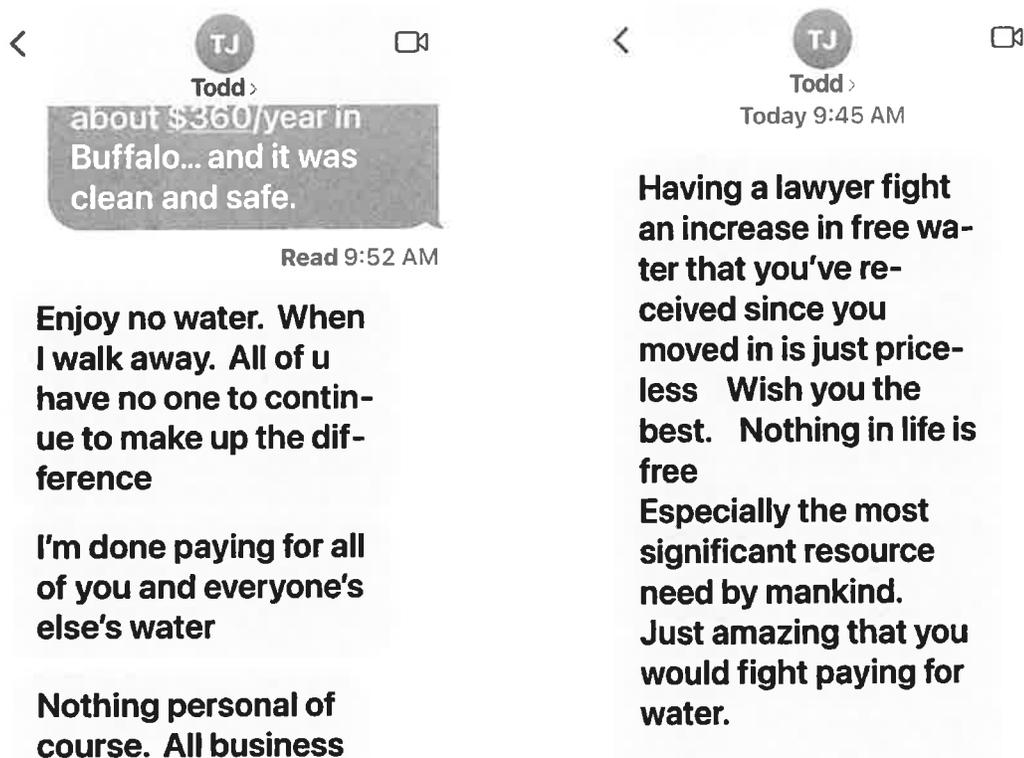
7. The Company is also proposing to increase its flat consumption charge for seasonal residential customers – in order to unify the seasonal and year-round residential customer rates – from \$7.20 per month to \$122.30 per month, or \$21 per quarter to \$366.90 per quarter, an increase of approximately 1698.6%.

8. Simultaneous with this filing, the Company also filed a Petition for a water

metering exception at P-2023-3042648 seeking to untether any objective basis for its water bills based upon actual usage. The Complainants have filed preliminary objections to the same.

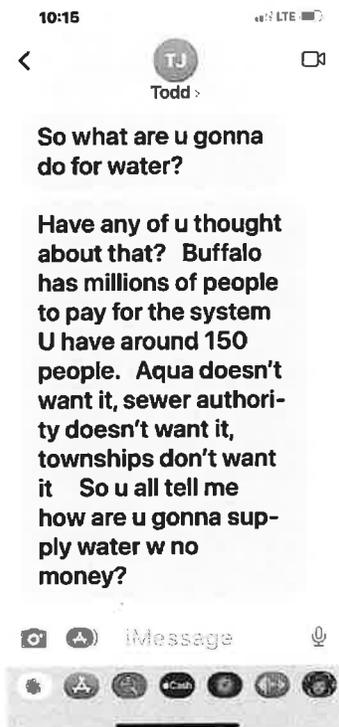
9. The members of the community have significant concern that not only are the rates disproportionate to the actual water usage but the rates set by the Company are arbitrary, unreasonable, and may be used to fund other activities beyond water service.

10. For example, Mr. Todd Joseph, the owner of the Company has recently taken to sending threatening messages to certain members of the Conneaut Lake Objectors Mr. Joseph sent the following text messages dated October 3, 2023: “enjoy no water” and “having a lawyer fight an increase in free water...is just priceless.” See **Exhibit B**, letter of Heather and David Shean dated October 11, 2023.



11. Mr. Joseph has further flaunted his monopoly power over community members

by asking, "so what are u gonna do for water? Have any of u thought about that?" See Exhibit B.



12. However, beyond the threatening and retaliatory behavior exhibited by the Company owner, community members have valid reasons to question Mr. Joseph's substantial rate increases without the tether of actual water meters. Mr. Joseph is the owner of Keldon Holdings, Inc., which acquired Conneaut Lake Park Water Corporation and other Park assets through a sale in Bankruptcy Court in 2021.²

13. Mr. Joseph has ambitious plans to expand the Park, including the addition of a new swimming pool, miniature golf course, a tiki bar near the lake, a marina for approximately 100 boats, a large convention center, and an estimated 5 acres of land/fairgrounds/amusement park used to host large annual festivals. *Id.*

14. At the very least, Mr. Joseph, as the current owner of Conneaut Lake Park

² Jim Martin, Conneaut Lake Park owner envisions more campsites where amusement park rides once existed GoErie.com (2022), <https://www.goerie.com/story/news/local/crawford-county/2022/09/21/conneaut-lake-park-owner-seeks-variance-add-more-camping-sites-camperland-todd-joseph/69506080007/> (last visited Oct 6, 2023).

and the Water Company, faces a conflict of interest in his pursuit to restore the Park and generate funds while also owing a duty to the community to provide safe and reasonably priced water.

15. The Company is obligated, per 52 Pa. Code §65.7(b), to provide water to the community and to install water meters at *its* own expense.

16. Complainants assert that the Company's proposed rates, rate design, and class revenue allocation may be unjust, unreasonable, and unlawfully discriminatory, potentially violating Sections 1301 and 1304 of the Public Utility Code, 66 Pa.C.S. §§1301 and 1304. These actions may also contravene appropriate public policy and sound ratemaking considerations, possibly lacking adequate support from the materials filed by Conneaut.

17. Furthermore, since these price increases affect each member of the community differently, several Conneaut Lake Objectors have composed letters outlining their specific concerns. These letters are collectively attached hereto as **Exhibit B**.

18. Below are some select extracts from the community letters:

- A. “The proposed rate increase is beyond unfair and is not rooted in logic or a reasonable way to determine water usage between one residence to the next.” -Melissa Maxwell of 10944 Henry Street, Conneaut Lake, PA 15071.
- B. “How can we be charged for water that we are not using. We have not received any water testing reports for over a year. So for this price increase we are not getting anything, no new water lines, no meters, nothing. We feel that this rate increase is unfair and unreasonable.” Lydia and Joseph Batcha of 10901 Lake Front Street, Conneaut Lake, PA 16316.
- C. “Let us be reasonable...The water usage varies from house to house...How can there be any fairness with good judgment of setting one price to each household when there are so many different circumstances...Last but not least, I think it is in poor taste for Mr. Joseph to be badgering and threatening some of the neighbors who are not agreeing with him.” -Diana Hoover of 12608 Comstock Street, Conneaut Lake, PA 16316.

- D. “It is inconceivable how a rate increase of this magnitude can be justified. Water is an essential service, and to propose such an excessive increase in its cost renders it unaffordable for the vast majority of residents, thereby jeopardizing the welfare of the community. Such a dramatic escalation in rates would unquestionably constitute an undue burden on consumers, many of whom are already financially strained...Moreover, I have not seen any data-driven rationale that would in any way justify this proposed rate hike.” -Julie Leader of 12549 Comstock Street, Conneaut Lake, PA 16316
- E. “Although we understand the need for a rate increase, we are completely and totally opposed to the exorbitant and unreasonable amount Mr. Joseph has requested.” -David Arrigo of 10861 Utley Avenue, Conneaut Lake, PA 16316.
- F. “This increase is likely to pose financial challenges for numerous local and seasonal residents. We believe a reasonable increase in fees is justifiable to ensure the provision of safe, potable water, aiming to enhance community services...[w]e kindly request that you either decline the request for an increase entirely or modify it to a fair rate based on usage.” -Russell and Kara Huffmyer of 12220 Comstock Street, Conneaut Lake, PA 16316.
- G. “The water company has recently filed for a proposed **astronomical** rate hike...Mr. Joseph has other business interests in the park, namely Camperland (which is looking to expand) and the Tiki Bar on the beach...It looks like Mr. Joseph, in requesting the meter exemption, is attempting to put the entire expense of the water system on the backs of the homeowners! I don’t think anyone would be opposed to a modest increase to keep the system in good working order, **BUT**, the idea of **a 750% rate hike is absurd** and I hope the commission is able to see this.” -Andrew and Mary Alice Matthew of 12665 Comstock Street, Conneaut Lake, PA 16316.
- H. “We are not opposed to a rate increase but the amount they are requesting is a little excessive...[W]e feel we should pay for the water we use...” Glenn and Maryann Kerr of 12597 Comstock St, Conneaut Lake, PA 16316.
- I. “Not only do I feel that these rates not represent my accurate monthly usage, but I believe this massive increase may be a hardship to many.” – Karen Memmo of 110656 Henry Street, Conneaut Lake, PA 16316.
- J. “These proposed rates are unreasonable. The rate increases are usually required to ensure the system is in good working order and provide for maintenance. However, the proposed rate is more than a 1600% rate increase!” – Mary Webber of 11043 Henry Street, Conneaut Lake, PA 16316.
- K. “[By Comparison to the Proposed Rate Hikes][o]ur Conneaut Lake residence serves as a part-time dwelling, as our primary residence is

located at 222 Park Ave., Ellwood City, PA 16117. At our Ellwood City home, we average \$33 monthly in water fees... I prefer that we move to a metered water service.” – David Cherry of 12375 Lake Street, Conneaut Lake, PA

- L. “I agree that the water rates could be increased, but not at the 750% increase that Todd Joseph is proposing...The water corporation needs to upgrade the system, install meters, and provide safe drinking water. I fear that this rate increase will ignore the upgrades needed, and instead finance the new installation of utilities for the new campground of over 450 campsites and cabins.”-Heather and David Shean of 10845 Utley Avenue, Conneaut Lake, PA 16316.

See **Exhibit B**.

19. In view of the foregoing, the Conneaut Lake Objectors respectfully request that the Pennsylvania Public Utility Commission:

- A. Suspend and investigate the operation of Supplement No. 1 to Tariff Water-Pa. P.U.C. No. 1;
- B. At the conclusion of such investigation, reject the proposed new rates and other tariff changes in Supplement No. 1 to Tariff Water-Pa. P.U.C. No. 1 to the extent required to ensure that Conneaut’s rates are lawful, just, reasonable and not unduly discriminatory to its customers;
- C. Consolidate the proceeding regarding the Company’s Petition for an Exception from Metering Requirements, Docket No. P-2023-3042648, with the instant Base Rate proceeding, due to the interrelated nature of metering and the determination of just and reasonable rates;
- D. Hold full evidentiary hearings examining the reasonableness of the Company’s requests;
- E. Hold in-person public input hearings in the Company’s service territory, or, alternatively, hold hearings virtually or by telephone, as may be needed to provide its customers with an opportunity to be heard

- on the record, if consumer interest arises;
- F. Modify or reject the proposed rate increase and tariff changes which cannot be fully justified by the Company and shown to be just and reasonable and in the public interest, or which are otherwise contrary to the Public Utility Code, sound ratemaking principles, and public policy; and
- G. Grant such other relief as may be necessary or appropriate including ordering the utility and its owner to cease and desist from threatening its customers.

Respectfully submitted,

/s/ Joshua D. Brown

Joshua D. Brown
Attorney ID No. 315339
Rhonda Jaquay, et al. and
the Conneaut Lake Objectors

Dillon McCandless King Coulter &
Graham LLP
128 West Cunningham Street
Butler, PA 16001
(724)-283-2200

Dated: October 13, 2023

NOTICE OF PROPOSED RATE CHANGES

To Our Customers:

Conneaut Lake Park Water Corporation ("the Company") is filing a request with the Pennsylvania Public Utility Commission (PUC) to increase your water rates as of October 31, 2023. This notice describes the Company's rate request, the PUC's role, and what actions you can take.

The Company has requested an overall rate increase of \$257,797 per year. If the Company's entire request is approved, the total flat rate bill for a full time residential customer would increase from \$14.39 to \$122.30 per month or by 750% and for a seasonal residential customer from \$7.20 to 122.30 per month or by 1600%. The total bill for the small commercial customer would increase from a rate of \$100.00 to \$850 per month or by 750%. The total bill for a large commercial customer will increase from a rate of \$256.87 to \$2,183.40 per month or 750%.

To find out your customer class or how the requested increase may affect your water bill, contact The Company at 814-225-7985. The rates requested by the Company may be found in Tariff No. 1, Supplement No. 1. You may examine the material filed with the PUC which explains the requested increase and the reasons for it. A copy of this material is kept at the office of the Hotel Conneaut, 12241 Lake Street, Conneaut Lake, PA 16316.

The state agency that approves rates for public utilities is the PUC. The PUC will examine the requested rate increase and can prevent existing rates from changing until it investigates and/or holds hearings on the request. The company must prove that the requested rates are reasonable. After examining the evidence, the PUC may grant all, some, or none of the request or may reduce existing rates.

The PUC may change the amount of the rate increase or decrease requested by the utility for each customer class. As a result, the rate charged to you may be different than the rate requested by the company and shown above.

There are three ways to challenge a company's request to change its rates:

- 1) You can file a formal complaint. If you want a hearing before a judge, you must file a formal complaint. By filing a formal complaint, you assure yourself the opportunity to take part in hearings about the rate increase request. All complaints should be filed with the PUC before October 31, 2023. If no formal complaints are filed, the Commission may grant all, some or none of the request without holding a hearing before a judge.
- 2) You can send the PUC a letter telling why you object to the requested rate increase. Sometimes there is information in these letters that makes the PUC aware of problems with the company's service or management. This information can be helpful when the PUC investigates the rate request. Send your letter or formal complaint form to the Pennsylvania Public Utility Commission, Post Office Box 3265, Harrisburg PA 17105-3265.
- 3) You can be a witness at a public input hearing. Public input hearings are held if the PUC opens an investigation of the Company's rate request and if there is a large number of customers interested in the case. At these hearings you have the opportunity to present your views in person to the judge hearing the case and the Company representatives. All testimony given "under oath" becomes part of the official rate case record. These hearings are held in the service area of the Company.



October 11, 2023

To the PUC:

Docket # R-2023-3041575

In regard to the rate increase and metering exemption from the Conneaut Lake Park Water Corporation, I am writing this letter to voice my concerns.

I agree that the water rates could be increased, but not at the 750% increase that Todd Joseph is proposing. I would be willing to pay an increase, if I could drink the water. We choose not to drink the water coming from the CLP Water Corporation, based on several factors. Our water is frequently discolored coming out of the faucet. We have to change our filters frequently. But the most disconcerting factor is the letter we received from the Water Corporation stating that they did not complete the necessary testing regulations. This implies negligence on their part. In addition, the unsightly water tower, in desperate need of repair and renovation, implies further negligence.

Currently, each resident on the CLP Water Corporation system pays a rate depending on if they are seasonal or year-round. My household of 2 people pays the same as a house of 6 people, or a house of 1. Metering the homes is the only way to quantify how much water each household consumes. Mr. Joseph is claiming that he cannot meter the homes based on 4 different reasons, all of which are invalid.

I received information from a neighbor that this rate increase is Mr. Joseph's attempt to scare residents into converting to their own well, at their own expense. He believes that if he can get his water corporation to service under 125 houses, then he is not governed under the PUC and can charge any rate that he wants.

On October 3, 2023, I received a series of text messages from Todd Joseph, threatening to walk away and to no longer provide water. Those messages are attached.

The antiquated water lines buried under the ground are in desperate need of upgrades. The water corporation needs to upgrade the system, install meters, and provide safe drinking water. I fear that this rate increase will ignore the



upgrades needed, and instead will finance the new installation of utilities for the new campground of over 450 campsites and cabins. The full time and seasonal residents should not bear the burden of paying for installation of utilities and the usage of those utilities. The residents of Camperland - the current campground - have not received an increase for water usage, only the homes and the 3 listed businesses are on the list for a rate increase.

Thank you for your attention to this matter.

Sincerely,
Heather & David Shean
Full time resident at
10845 Utley Ave
Conneaut Lake, PA

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Comment on Proposed Rate Increase

Filing this form allows you to offer your comment, but you will not be a party to the case. The form will be placed in the document folder for review by the presiding officer, the parties to the case and Commission staff.

If you wish to be a party to the case, you must file a Formal Complaint to Proposed Rate Increase.

To complete this form, please type or print legibly in ink.

1. **Customer Information (required)**

Provide your name, mailing address, county, telephone number(s), e-mail address and utility account number.

Name **Melissa Maxwell**
Street/P.O. Box 2515 Hilltop Road
City Oakdale State PA 15071
County Allegheny

Telephone Number(s) (required) Where We Can Contact You During the Day:

(412) 913-0773

E-mail Address (required): MISSYMAXWELL84@OUTLOOK.COM

Utility Account Number (from your bill) _____ DO NOT HAVE ONE XXX

If your opinion involves utility service provided to a different address or in a different name than your mailing address, please list this information below.

Name **Melissa Maxwell**
Street/P.O. Box 10944 Henry Street
City Conneaut Lake PA 15071

2. **Name of Utility**

Provide the full name of the utility who filed the proposed rate increase that is the subject of your comment. The name of your utility or company is on your bill.

Conneaut Lake Park Water Corporation

3. **PUC Case Docket Number**

Provide the Public Utility Commission case docket number (if known). It begins with the letter "R" and contains the year of filing and a 7-digit code, such as R-2012-1234567.

4. **Type of Utility Service**

Check the box listing the type of utility service that is the subject of your comment (check only one):

- | | |
|---|---|
| <input type="checkbox"/> ELECTRIC | <input type="checkbox"/> STORM WATER |
| <input type="checkbox"/> GAS | <input type="checkbox"/> WASTEWATER/SEWER |
| <input checked="" type="checkbox"/> WATER | <input type="checkbox"/> TELEPHONE/TELECOMMUNICATIONS (local, long distance) |
| <input type="checkbox"/> STEAM HEAT | <input type="checkbox"/> MOTOR CARRIER (e.g. taxi, moving company, limousine) |

5. **Comment**

Describe your views about the proposed rate increase. Use additional paper if you need more space.

We would like to file a complaint regarding the proposed rate increase for water at Conneaut Lake Park. The proposed rate increase is outrageous, astronomical, and is not based on reasonable principle or reality. We own a summer cottage that we only use 6 months out of the year only on weekends (however we do not use it every weekend). We estimate that we use our cottage between 50-70 days per year.

Our cottage is only used by my husband and I. We do not have laundry machines or a dishwasher. Our water consumption for (2) people is very low. It is important to note that we do not drink the water at our cottage because the quality and consistency of the water is poor at best. It smells of chemicals and often has a rust-colored tint.

The proposed rate increase is beyond unfair and is not rooted in logic or a reasonable way to determine water usage between one residence to the next. They are suggesting that seasonal residents pay the same as full time residents with no metering of water usage. This proposed rate is more than double what we pay for our full-time residence in Allegheny County. To say this is price gouging is an understatement.

October 10, 2023

Lydia and Joaeph Batcha
7036 Navajo Trl
Solon, OH 44139
lmbatcha@roadrunner.com

We are requesting that the PUC deny the water rate increase submitted by Mr. Joseph, We are seasonal customers and spend 3 days a week at the cottage, from the first week of May until the third week of October, That is the period of time we have the water on. We will now be charged for 12 months at \$122.30 per month. Which is \$1,464.00 versus \$86.40 per year which is what we currently pay. How can we be charged for water that we are not using. We have not received any water testing reports for over a year. So for this price increase we are not getting anything, no new water lines, no meters, nothing. We feel that this rate increase is unfair and unreasonable.

Lydia and Joseph Batcha
10901 Lake Front St.
Conneaut Lake, PA 16316

Lydia M. Batcha
Joseph A. Batcha

10/11/2023

To Whom it May Concern,

I am writing in response to the price hike that Todd Joseph is requesting from myself and from the people in this neighborhood as our water is supplied by Conneaut Lake Park.

Requesting a reasonable price increase is one thing but when the request is completely off the wall, then that is another issue. Let us be reasonable. I live in my home alone, others are couples who share a home and then families with 4-5 occupants. The water usage varies from house to house. Another instance is how much a family lives here. I live here all year long however some live here only through the summer and others only on weekends during summer months.

How can there be any fairness with good judgement of setting one price to each household when there are so many different circumstances. We need to be given the use of meters and it should not be up to the residents to pay for them.

Mr. Joseph purchased Conneaut Lake Park with the understanding and knowledge that he was responsible to furnish the residents water that is usable in every way including drinking, cooking and to bath in.

Prior to Mr. Joseph's purchase of the Park, I would get an annual report of the condition of our water. The last water report I received is from 2019.

I received a notice dated 6/11/2022 which was over a year after Mr. Joseph purchased the park(3-2-2021). It was sent by Christopher Greenberg. His title was of an operator on this report. The report was titled Public Notice "**Failure to Monitor**" The monitor requirements were not met for the Conneaut Lake Park Water Co. Some samples were to be taken 2021 but were taken in 2022. Four samples were taken 2018 and were in this report 2022. This report has many discrepancies. This is of great concern.

Copy of report has been sent to Josh Brown.

What exactly is the condition of the water today? Does anyone really know?

Another concern is the water tower located inside the park. It is in need of repairs and dire need of a paint job. It appears that if it is not attended to soon, it could collapse. There needs to be a thorough inspection done on the structure of that water tower as well as the safety of the water.

Last but not least, I think it is in poor taste for Mr. Joseph to be badgering and threatening some of the neighbors who are not agreeing with him.

I greatly appreciate your efforts in regards to this matter and considering my concerns.

Respectfully,

Diana Hoover
12608 Comstock St.
Conneaut Lake, PA 16316

Julie Laeder
12549 Comstock St.
Conneaut Lake, PA 16316
ladyram42@aol.com
(719)648-8202
September 9th, 2023

Pennsylvania Public Utility Commission
Bureau of Consumer Services
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Proposed Water Rate Increase by Conneaut Lake Park Water Corporation in Summit Twp., Crawford County, Pennsylvania

Dear Commissioners,

I am writing to express my vehement disagreement and grave concern over the proposed rate increase of 1600% for water services provided by Conneaut Lake Park Water Corporation in Crawford County, Pennsylvania. This proposal is not only economically untenable for consumers but also morally objectionable, considering the company's recent acquisition under bankruptcy proceedings.

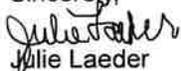
It is inconceivable how a rate increase of this magnitude can be justified. Water is an essential service, and to propose such an excessive increase in its cost renders it unaffordable for the vast majority of residents, thereby jeopardizing the welfare of the community. Such a dramatic escalation in rates would unquestionably constitute an undue burden on consumers, many of whom are already financially strained.

It is also deeply unsettling that Conneaut Lake Park Water Corporation, which recently purchased the utility at a discounted rate via bankruptcy, is now attempting to pass on the cost of deferred maintenance and infrastructure upgrades to its customers. This tactic not only flouts ethical norms but also calls into question the integrity of the company's operational and financial planning.

Moreover, I have not seen any data-driven rationale that would in any way justify this proposed rate hike. The absence of such justification further fuels suspicion that the intent is merely to exploit the customer base for short-term gains, with little regard for long-term consequences or community well-being.

I respectfully urge the Pennsylvania Public Utility Commission to subject this proposed rate increase to rigorous scrutiny and to consider its disproportionate impact on the residents of Crawford County. I also request that you use your authority to prevent this unreasonable and unethical rate hike from being implemented.

Your prompt attention to this pressing issue is highly anticipated and much appreciated. I am willing to discuss this matter further, should it be deemed necessary for a more comprehensive evaluation.

Sincerely,

Julie Laeder

RE: Conneaut Lake Park Water Corporation Petition

Docket #P-2023-3042648

Docket #R-2023-3041575

September 13, 2023

My name is David Arrigo. I am a homeowner and year round resident along with my wife Jacquelyn, at 10861 Utley Ave. We are a customer of Conneaut Lake Park Water Corporation, Inc. and we are opposed to the proposed 750% increase on our monthly water bill. We are also opposed to the meter exemption that the CLPWC has petitioned for. Although we understand the need for a rate increase, we are completely and totally opposed to the exorbitant and unreasonable amount Mr. Joseph has requested. Meters on the residential homes and cottages are the only way to ensure equitable and fair billing.

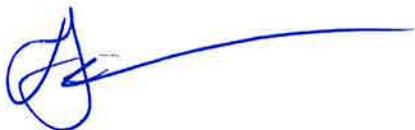
After receiving the Public Notice from the Commonwealth of Pennsylvania Department of Environmental Protection Bureau of Safe Drinking Water (form 3930-FM-BSDW0196B) PWS ID #6200018 dated June 17, 2022, that monitoring requirements were not met by the CLPWC, Inc. (form enclosed), I felt compelled to install a Kinetic Water Treatment System in my home. I have enclosed photos of the system, photos of the filtration, and costs of the system. The photos show the orange sediment that the incoming water contains. The photos also show the difference between the new filters and the used, which are changed every 3-6 months, as well as the sediment at the bottom of the 30 gallon chlorine holding tank-which puts required chlorine back into the water that the incoming water does not contain. Along with this system, there is an additional system in the kitchen to filter out the arsenic and other contaminants that, according to the above notice, CLPWC did not test for.

We took on the cost of this system to provide our home with safe drinking water.

We agree the Conneaut Lake Park water system needs to be updated. Within one year, we had multiple water breaks the entire length of Utley Ave, with 3, maybe 4 leaks on the main line in front of our home alone. Mr. Joseph would have known the condition of the water system when he purchased the property. Now with his current and future planned expansions within the park, the water system needs to be upgraded and he is trying to recoup his expenses from the homeowners.

Please consider carefully all the ramifications of granting a meter exemption and such an exorbitant rate increase to us homeowners before making your decision.

Thank you for your consideration on this matter.



David Arrigo

10/12/2023

To: Pennsylvania Public Utility Commission
From: Russell and Kara Huffmyer

RE: Rate Increase request from Conneaut Lake Park Water Corporation

Dear PUC:

We recently received a 'NOTICE OF PROPOSED RATE CHANGES' from the law firm representing Conneaut Lake Park Water Corporation. They wish to increase our water rate from \$14.39 per month to \$122.30 per month (an increase of 750%), as of October 31, 2023.

We acquired our property in August this year with intentions to utilize it as our secondary residence. During our initial weekend stay, we encountered an issue where the water appeared discolored, rendering it unfit for consumption. We received advice to refrain from drinking the water, as it occasionally turns brown. I am highlighting this matter to shed light not only on the substantial spike in water service costs but also on the concerning quality of the water. This increase is likely to pose financial challenges for numerous local and seasonal residents. We believe that a reasonable increase in fees is justifiable to ensure the provision of safe, potable water, aiming to enhance community services and diligently monitor water consumption for appropriate billing. We kindly request that you either decline the request for an increase entirely or modify it to a fair rate based on usage.

If a hearing is scheduled for this issue, kindly inform us so we can make arrangements to participate.

Thank you,
Russell and Kara Huffmyer
12220 Comstock Street,
Conneaut Lake, PA 16316

To - Pennsylvania Public Utility Commission

Re: Conneaut Lake Park Water Corporation Proposed Water Rate Increase

Docket # - P-2023 3042648

R-2023-3041575

My name is Andrew (Drew) Mathew and I, along with my wife, Mary Alice Mathew, own a seasonal cottage at 12665 Comstock St., Conneaut Lake (Park), PA. We are currently customers of the Conneaut Lake Water Corporation. The water company has recently filed for a proposed astronomical rate hike. In addition, they have also filed a petition asking to be exempt from the metering requirements. We feel that the metering exemption idea should be addressed first. This is the only fair and equitable way to go! Mr. Todd Joseph has other business interests in the park, namely Camperland (which is looking to expand) and the Tiki Bar on the beach. The water company receives no revenue from these operations. It looks like Mr. Joseph, in requesting the meter exemption, is attempting to put the entire expense of the water system on the backs of the homeowners!

I don't think anyone would be opposed to a modest increase to keep the system in good working order, **BUT**, the idea of a 750% rate hike is absurd and I hope the commission is able to see this. The proposed increase would put a strain on all homeowners in the area. In addition, we believe that if the water is shut off at the end of the season, (like a majority of the seasonal cottage owners do) that there should not be the full monthly seasonal rate. **No water usage = no monthly bill!!** The proposed rates are nowhere near the monthly rates that we pay on our primary residences.

We are asking you, in good conscious, to deny the request altogether or adjust it to a reasonable rate.

Sincerely,

Andrew (Drew) J. Mathew

Mary Alice Mathew

October 12, 2023

To: Pennsylvania Utility Commission

RE: Rate Increase from Conneaut Lake Park Water Company

Dear PUC:

We recently received a notice from the Conneaut Lake Park Water Company regarding a proposed rate increase. We are not opposed to a rate increase but the amount they are requesting is a little excessive.

We are seasonal residents of Conneaut Lake Park (April-November). During that time, we are there maybe 1 or 2 weeks a month. We feel we should pay for the water we use and would not be opposed to a meter being installed. Our house does have a crawlspace, but we understand that a meter can be installed inside the house.

If there is a hearing on this matter, we would like to be notified so we can attend.

Thank you,

Glenn & Maryann Kerr

Glenn & Maryann Kerr
13 Oakville Drive
Pittsburgh, PA 15220

Date: 10/13/2023

To: Pennsylvania Public Utility Commission

From: Karen Memmo, 11065 Henry Street, Conneaut Lake

RE: Rate increase request from Conneaut Lake Park Water Corporation (CLPW)

Dear PUC:

I recently received a "Notice of Proposed Rate Changes" from the CLPW attorneys that stated CLPW planned on increasing our water rate on October 31, 2023 from \$7.20 per month to \$122.30 per month.

Understandably, utilities rates are naturally expected to increase over years. These rate increases usually are required to ensure the system is in good working order and provide for maintenance. However, the proposed rate is a 1600% rate increase. My residence, as many others that are involved in this litigation, are seasonal only. Not only do I feel that these rates not represent my accurate monthly usage, but I believe this massive increase may be a hardship to many. I am requesting that this increase is denied in whole, or adjusted to be a reasonable rate.

Please consider this correspondence as my formal complaint regarding this matter. Should a hearing be set to discuss this issue, please notify me of that the date as I would like to be present to oppose this matter.

Thanks,

Karen Memmo

19655 Battery Park Rd.

Smithfield, VA 23430

October 10, 2023

To: Pennsylvania Public Utility Commission

From: Mary Webber
11043 Henry St
Conneaut Lake, PA 16316

RE: Rate increase request from CLPW (Conneaut Lake Park Water Corporation) attorneys.

Dear PUC,

Having recently reviewed a "Notice of Proposed Rate Changes" from the CLPW attorneys' that state CLPW planned on increasing our water rate on October 31, 2023, from \$7.20 per month to \$122.30 per month.

These proposed rates are unreasonable. The rate increases are usually required to ensure the system is in good working order and provide for maintenance. However, the proposed rate is more than a 1600% rate increase! Our residence as well as others in this litigation are seasonal homes. These rates do not represent accurate usage and believe this would be a hardship to many. We request the increase be denied in whole until a plan for maintenance is in place.

I am afraid of the Todd Joseph comments and feel their threatening nature will put our seasonal home in jeopardy in the future.

Should a hearing be set for this matter, please let us know the date we intend to be present to oppose this matter.

Please consider this my formal complaint.

Thank you,

A handwritten signature in cursive script that reads "Mary Webber". The signature is written in black ink and is positioned above the typed name.

Mary Webber

Mary Webber
277 Benson Rd
Victor, NY 14564

October 13, 2023

TO: Pennsylvania Utility Commission

RE: Rate Increase in Conneaut Lake Park Water Company

I am writing to address concerns and provide relevant information about the water service in Conneaut Lake, specifically in regard to the proposed water fees. My wife and I built our home adjacent to Conneaut Lake Park, with our address being 12375 Lake Street. We moved into our new residence in late summer 2022. During construction, we paid a \$7500 Tap-In Fee to gain access to water. Our Water Tap/Permit Fee allowance through our building loan was \$2000, which is typical. In comparison our Sewage Tap In Fee was also \$2000 and our actual expense was \$1850. So, as a new customer I believe that I have already contributed my part toward system maintenance and upgrades.

We had our water tested soon after gaining our occupancy permit. The water test found many contaminants at levels that concerned us. Subsequently, we immediately installed a whole home water filtration system that cost \$4495. The system has removed the contaminants (or reduced them to levels of no concern), however, we're still experiencing some discoloration of the water that stains our toilet bowls.

Our Conneaut Lake residence serves as a part-time dwelling, as our primary residence is located at 222 Park Ave., Ellwood City, PA 16117. At our Ellwood City home, we average \$33 monthly in water fees. Typically my wife and I are in Conneaut Lake from Thursday night to Sunday morning. Through the summer we made it to Conneaut most weekends (I can only recall 5 weekends that we missed from May - Sept) I'll come up on other weekdays to take deliveries or to meet contractors. We typically have family visiting on the summer holiday's and for Pumpkin Fest weekend.

Other than an 8 day period where I watered my newly planted grass for 15 minutes daily (I used an automated watering system), our water consumption has been very low. I prefer that we move to a metered water service. If we agree to a fixed fee. As a part time resident spending less than 40% of my days at Conneaut Lake, I'd expect to pay less than \$20 a month (no where near the \$120 that is being proposed).

Sincerely,

David Cherry

12375 Lake Street,

Conneaut Lake, PA

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility : **Docket No. R-2023-3041575**
Commission v. Conneaut Lake Park :
Water Corporation, Inc. :
:

**PUBLIC STATEMENT OF
CONNEAUT LAKE OBJECTORS**

The Complainants-Conneaut Lake Objectors are members of the Conneaut Lake community, customers of the Respondent and have been provided Notice with a deadline to file Formal Complaints by October 31, 2023. For the following reasons, the Conneaut Lake Objectors as members of the Conneaut Lake community and customers of Conneaut Lake Park Water Corporation, Inc. ("Conneaut" or the "Company"), have filed a Formal Complaint against the rates, terms, and other provisions of Supplement No. 1 to Tariff Water-Pa. P.U.C. No. 1.

This Complaint is in response to the proposed Tariff filed on August 31, 2023, by Conneaut Lake Water Corporation, Incorporated, which, if approved by the Commission, would increase the total distribution revenues of the Company by \$257,797 per year, a staggering 970.8% increase in annual distribution revenues.

The Conneaut Lake Objectors have reviewed the materials submitted by the Company in support of this rate increase and believe that these materials may be insufficient to justify the requested rate increase. We assert that the Company's present and proposed rates, rules, and conditions of service may be unjust, unreasonable, unduly discriminatory, and otherwise contrary to law.

Specifically, the proposed rate increases would have a severe impact on year-round and

seasonal residential customers. The flat consumption charge for year-round residential customers would increase by 849.9%, while seasonal residential customers would experience an approximately 1698.6% increase. These proposed rate hikes, combined with the Company's Petition for a water metering exception, have raised concerns within our community.

The inappropriate behavior exhibited by Mr. Todd Joseph, the owner of the Company, towards certain members of the Conneaut Lake Objectors, further exacerbates our concerns. Threatening messages and taunts from Mr. Joseph, coupled with his expansive plans for Conneaut Lake Park and its amenities, have created a significant conflict of interest between his business ventures and the community's need for reasonably priced and safe water.

In view of the foregoing, the Conneaut Lake Objectors will participate in proceedings before the Commission to investigate the reasonableness of the proposed rates in Conneaut's proposed Supplement No. 1. The Conneaut Lake Objectors will ask the Commission to deny any proposed rate increase or other changes in Conneaut's present tariffs that are not proven by Conneaut to be lawful, just, reasonable and nondiscriminatory to all of its customers.

Dated: October 13, 2023

VERIFICATION

I Rhonda Jagway, hereby state that the facts set forth herein above 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).

Date: 10/11/2023

Rhonda L. Jagway
NAME:

VERIFICATION

I Melissa Maxwell, hereby state that the facts set forth herein above 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).

Date: 10/10/2023

Melissa Maxwell
NAME:

VERIFICATION

LYDIA M. BATEH, hereby state that the facts set forth herein above 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).

Date: 10/11/2023

Lydia M. Bateh
NAME:

VERIFICATION

I Edward Grieser, hereby state that the facts set forth herein above 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).

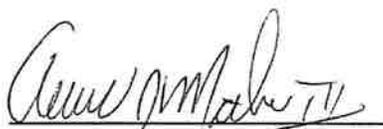
Date: October 11, 2023


NAME:

VERIFICATION

I Andrew Mathew, hereby state that the facts set forth herein above 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).

Date: 10-12-2023



NAME:

VERIFICATION

GLENN KERR
I MARYAM KERR hereby state that the facts set forth herein above 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).

Date: 10-12-2023

Glenn Kerr
Maryam Kerr
NAME:

David Shean + **VERIFICATION**
I Heather Shean hereby state that the facts set forth herein above 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).

Date: 10/12/2023

Heather Shean
NAME:
David P. Shean

VERIFICATION

Scott HERMAN
I Christine Herman, hereby state that the facts set forth herein above 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).

Date: 10/8/2023

Christine Herman

NAME:

VERIFICATION

I HERALD BALDWIN hereby state that the facts set forth herein above 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).

Date: 10-9-2023



NAME:

VERIFICATION

Judis Hartung
Lany Hartung, hereby state that the facts set forth herein above 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).

Date: 05/22/23

Judis Hartung
Lany Hartung
NAME

VERIFICATION

I Alexander Hillier hereby state that the facts set forth herein above 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).

Date: 10/12/23


NAME:

VERIFICATION

I Dan DiMucci hereby state that the facts set forth herein above 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).

Date: 10-13-23

Dan DiMucci
Dan DiMucci
NAME:

VERIFICATION

I RICHARD WALLACE, hereby state that the facts set forth herein above 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).

Date:

10/12/23

NAME:



VERIFICATION

I Kara Huffmyer hereby state that the facts set forth herein above 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).

Date: 10/12/23

Kara Huffmyer
NAME:

VERIFICATION

I Karen Memma hereby state that the facts set forth herein above 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).

Date: 10-13-2023

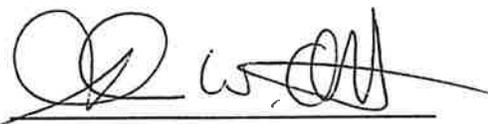
Karen C. Memma

NAME:

VERIFICATION

I Glenn Ott, hereby state that the facts set forth herein above 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).

Date: 10-12-23


NAME:

VERIFICATION

I DIANA HOOVER hereby state that the facts set forth herein above 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).

Date: Oct 12, 2023

Diana Hoover
NAME:

VERIFICATION

Mary Webber, hereby state that the facts set forth herein above 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).

Date: 10/12/2023

Mary E. Webber
NAME:

I&E Exhibit B

Pennsylvania Public Utility Commission
v.
Conneaut Lake Park Water Company
Docket No. R-2023-3041575
Interrogatories of the Office of Consumer Advocate
Set I

15. In regard to the customer complaint log referenced above, what is the Company's procedure when it receives a customer complaint?

RESPONSE:

The Company's procedure when it receives a customer complaint is to follow the process required by the PUC for addressing such complaints.

Responsible Witness: Todd Joseph
Date: 10-25-23

I&E Exhibit C

TUS Data Request Set 1
Conneaut Lake Park Water Corporation, Inc. Tariff Supplement No. 1 To Tariff Water -Pa.
P.U.C. No. 1 at Docket No. R-2023-3041575

- R-23 Please quantify the number of disputes initiated by Conneaut customers since Conneaut's inception that required compliance with dispute procedures under 52 Pa. Code § 56.151.

RESPONSE:

Conneaut received PUC approval of its request for a Certificate of public Convenience on April 20, 2023. Since that time, there has been no dispute initiated by Conneaut customers since Conneaut's inception that required compliance with dispute procedures under 52 Pa. Code § 56.151. Prior to the receipt of the Certificate of Public Convenience, however, a customer did file a formal complaint relating to rates on April 10, 2023, but that matter was withdrawn by the customer.

Responsible Witness: Todd Joseph
Date: September 22, 2023

I&E Exhibit D

Pennsylvania Public Utility Commission
v.
Conneaut Lake Park Water Company
Docket No. R-2023-3041575
Interrogatories of the Office of Consumer Advocate
Set I

29. Do all customers have a separate water meter? If not, please discuss.

RESPONSE:

No residential customers have separate water meters. The commercial customers have water meters. The system was acquired through a Bankruptcy proceeding without meters being in place. The Company currently has a pending request to be exempt from the metering requirements for residential customers.

Responsible Witness: Todd Joseph
Date: 10-25-23

I&E Exhibit E

TUS Data Request Set 1
Conneaut Lake Park Water Corporation, Inc. Tariff Supplement No. 1 To Tariff Water -Pa.
P.U.C. No. 1 at Docket No. R-2023-3041575

R-17 Please explain how Conneaut determined Commercial Minimum Charges and provide copies of any supporting documentation.

RESPONSE:

The Company increased the minimum charge from the flat rate charge by 850%, the same percentage increase applied to the Year-Around Residential customer. A minimum was applied as these customers are metered. But, as these meters have never been read by the Company and usage cannot be predicted, it was determined to set the minimum at 850% of the flat rate to protect the Company from under collecting revenue once the meters are read on a monthly basis.

Responsible Witness: Constance E. Heppenstall
Date: September 22, 2023

TUS Data Request Set 1
Conneaut Lake Park Water Corporation, Inc. Tariff Supplement No. 1 To Tariff Water -Pa.
P.U.C. No. 1 at Docket No. R-2023-3041575

R-19 Please provide water meter readings and meter reading dates for each commercial customer served by Conneaut for the last two years.

RESPONSE:

As stated in response to TUS-1-17, the Company has not read the meters for the commercial customers as it would not affect their billing under a flat rate.

Responsible Witness: Constance E. Heppenstall
Date: September 22, 2023

TUS Data Request Set 1

Conneaut Lake Park Water Corporation, Inc. Tariff Supplement No. 1 To Tariff Water -Pa.
P.U.C. No. 1 at Docket No. R-2023-3041575

R-25 The Commission's Order entered September 18, 2003, at Docket A-210096, Appendix A identified several commercial customers served by the Trustees, including businesses known as Camperland, Hotel Conneaut, the Beach Club, the Convention Hall, and the Water Park. Also, the Trustees annual financial report for the 2020 calendar year included a copy of a Primary Facility Report that identified 185 domestic connections and 15 commercial connections. However, Conneaut's Bill Analysis only identified three commercial customers. For each Conneaut nonresidential customer, please specify the customer's name, provide an estimate of their monthly water usage and identify their applicable flat or minimum rate.

RESPONSE:

The Company's current three commercial customers include the Hotel Conneaut, Camperland and a Dollar General. The Beach Club, Convention Hall and the Water Park are no longer operational.

The customers monthly usage is not available as Company has not read the meters for these customers.

Camperland and the Dollar General will pay a minimum of \$850.00 per month and the Hotel Conneaut will pay a minimum of \$2,183.40 per month.

Responsible Witness: Constance E. Heppenstall and Todd Joseph
Date: September 22, 2023

I&E Exhibit F

BUREAU OF INVESTIGATION AND ENFORCEMENT INTERROGATORIES

CONNEAUT LAKE PARK WATER CORPORATION, INC.

Docket No. R-2023-3041575

Engineer: Ethan H. Cline

I&E-RB-1 Reference TUS-1-1 Attachment 3, included in the Company's Responses to Set 1 Data Requests. Provide any invoices or related documentation associated with the \$104,000 Transmission and Distribution Mains plant additions claimed in the year ended 12/31/2021.

RESPONSE:

See attached Exhibit RB-1

Responsible Witness: Todd Joseph
Date: 11/14/23

Licensed

Fully Insured

DC Plumbing and Contracting
11008 W. Townline Rd.
Conneaut Lake Pa 16316
Cell 1 814-282-6437
Cell 2 814-282-0413
Office 814-382-2300
DC_Contracting@hotmail.com

[Pennsylvania Home Improvement Contractor Registration Number PA058538]

Invoice Date: 5-20-2021

Invoice for work completed at: Camperland
Hwy 618
Conneaut Lake, Pa 16316

Service call to check clogged sewer
Pulled commode in mens bathroom
Ran electric eel and cables through drain line to free obstructions
Ran water in every fixture to test drains – ok
Commode flange was rusted out
Installed new repair flange and anchored to concrete floor
Commode tank bracket was rusted away and tank leaking
Picked up and installed new commode with new wax ring and bolts
Cleaned out all shower stalls and toilet stall that had sewage backup

Put in pa 1 call to mark out utilities for underground excavation
Excavated ground to expose water line
Installed new yard hydrant and connected to water line
Tested -ok
Backfilled ditch with gravel
Found sewer cleanout pipe buried in ground packed solid with dirt cleaned out and removed all dirt and flushed out lines
Disconnected and removed old water hydrant
Backfilled ditch and Graded out

All labor and materials unless specifically specified in contract are included in the final price of \$1,700.00 Invoice due within 10 days of the date listed above. Failure to pay within 10 days results in an added charge of 2% each week. Invoice payable by cash, checks, or credit card. If paying by credit card a transaction fee of 4.5% of total

Licensed

Fully Insured

will be added. Any bounced checks will have a fee of \$50.00. Please make checks payable to DC Contracting and if necessary mail checks to the address listed above.

Thank you.

Licensed

Fully Insured

DC Plumbing and Contracting
11008 W. Townline Rd.
Conneaut Lake Pa 16316
Cell 1 814-282-6437
Cell 2 814-282-0413
Office 814-382-2300
DC_Contracting@hotmail.com

[Pennsylvania Home Improvement Contractor Registration Number PA058538]

Invoice Date: 5-30-2021

Invoice for work completed at: Conneaut Lake Park and Camperland

Camperland

- Disconnected front bathroom near store
- Capped of sewer line
- Installed 2 new hose bibs on Al's camper #43
- Installed new hose bib handle on #31 and #32

Conneaut Lake Park

Bathroom near bumper car building

Women's

- Tried to find shut off curb stop valve to water onto bathrooms
- Turned on curb stop valve in between bumper cars and bathroom and found leak on above ground valve behind bumper cars--- missing bleeder cap
- Installed new bleeder cap
- Not the valve for the bathrooms had to dig around grass area in front of bathrooms as it was covered over by topsoil and hay
- Went to turn on water and found curb box packed full of dirt
- Vacuumed out dirt and water and tried to turn on water but curb box was off centered and on an angle curb and key would not fit around valve
- Had to dig up curb box and recenter over valve
- Backfilled dirt and graded back out
- Turned on water to test fixtures
- Installed 2 sinks and 2 new faucets
- Installed 2 new supply lines
- Installed 1 new s-trap and one p-trap and drain
- Installed 1 new flange tailpiece
- Installed caulking around sinks
- Found 4 sinks packed full of sediment
- Removed aerators and flushed out debris in lines
- Stall #4 replaced diaphragm and repaired leak on flush handle

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- Stall #5 replaced diaphragm and repaired leak on compression nut
- Stall #7 replaced diaphragm and repaired 2 leaks on compression nuts and leak on spud into commode bowl
- Stall #9 repaired leak on compression nut
- Stall #10 found flush valve running continuously replaced flush handle
- Sink#4 installed new drain and new trap

Mens's

- Vacuumed debris out of all urinals to avoid clogged drains
- Installed 2 new sinks and 2 new faucets
- Installed 1 new s-trap and 1 new p-trap and drain
- Installed 2 new supply lines and valves
- Caulked around sinks
- Stall #1 no water pressure found valve partially shut in back walkway behind commodes
- Stall #2 broken commode seat- replaced commode seat
- Stall #4 replaced diaphragm
- Stall #5 leak on compression nut and tightened packing on compression nut on flush valve handle
- Floor drain cover missing under sinks put new cover on to keep debris out

Front bathroom facing 618

- Reconnected flush valves on mens and womens commodes
- Ordered 2 new commodes and flush valves wax rings and bolts and installed
- Repaired section of 1 ¼" copper line

Water Park Utility room behind Restrooms

- installed 2 new electric 40 gallon water heaters
- Installed new circulating pump on hot water lines
- Rewired pump outlet to match new pump
- Special ordered new shower faucet plates and screws
- Cleaned up and Lubed up cartridges and installed

All labor and materials unless specifically specified in contract are included in the final price of \$6,975.00 Invoice due within 10 days of the date listed above. Failure to pay within 10 days results in and added charge of 2% each week. Invoice payable by

Licensed

Fully Insured

cash, checks, or credit card. If paying by credit card a transaction fee of 4.5% of total will be added. Any bounced checks will have a fee of \$50.00. Please make checks payable to DC Contracting and if necessary mail checks to the address listed above.

Thank you.

Licensed

Fully Insured

DC Plumbing and Contracting
11008 W. Townline Rd.
Conneaut Lake Pa 16316
Cell 1 814-282-6437
Cell 2 814-282-0413
Office 814-382-2300
DC_Contracting@hotmail.com

[Pennsylvania Home Improvement Contractor Registration Number PA058538]

Invoice Date: 6-10-2021

Invoice for work completed at: Conneaut Lake Park
10854 Utley Ave.

- Service call to check water leak
- Put in PA 1 call
- Excavated ground to expose leak
- Found leak on main water line. Water line was a black iron steel pipe (pipe used for gas lines not water lines)
- The water line was ran directly under very large tree and curb stop valve was overgrown by roots
- Shut down valved to begin to drain lines to entire park. Opened up fire hydrant to relieve pressure
- Excavated line back to main line and found another curb stop valve
- Opened up other valves and closed fire hydrant
- Disconnected existing water line and cut out section to make room for new connections
- Excavated trench from main line down driveway and into basement
- Typically the water company is only responsible for the main line up to the curb stop valve. However due to the sidewalk and large tree in the way it was far more practical and cheaper to install a new line down the driveway and enter the basement in a new location
- Installed new line and pipe sleeve through basement wall and sealed hydraulic cement
- Tied new line into existing plumbing
- Installed new curb box
- Tested for leaks – o.k
- Hauled away all wet fill dirt we dug out
- Backfilled ditch with gravel and graded out yard
- Spread out gravel in driveway

All labor and materials unless specifically specified in contract are included in

Licensed

Fully Insured

the final price of \$2,200.00 Invoice due within 10 days of the date listed above. Failure to pay within 10 days results in an added charge of 2% each week. Invoice payable by cash, checks, or credit card. If paying by credit card a transaction fee of 4.5% of total will be added. Any bounced checks will have a fee of \$50.00. Please make checks payable to DC Contracting and if necessary mail checks to the address listed above.

Thank you.

Licensed

Fully Insured

DC Plumbing and Contracting
11008 W. Townline Rd.
Conneaut Lake Pa 16316
Cell 1 814-282-6437
Cell 2 814-282-0413
Office 814-382-2300
DC_Contracting@hotmail.com

[Pennsylvania Home Improvement Contractor Registration Number PA058538]

Invoice Date: 6-14-2021

Invoice for work completed at: Conneaut Lake Park

- Put in PA 1 call to mark out ground
- Excavated trench for new water line and electric line
- Had to remove light posts and several sections of fence along park ave.
- There was a water line that protruded above ground behind the bumper car building
- Disconnected pex and copper sections of line and tied on new ¾" plastic cts water line
- Ran line to new curb stop valve behind building (in between bumper cars and transformer box) and installed new pvc piping and cap for curb box
- This curb box will isolate the bumper car building and food stand separately from water park water line if needed
- Installed tee fitting to branch off for future water line in bumper car building and continued the water line over to the food stand building
- Had to remove concrete slab in order to tunnel under transformer box to run conduit
- Went over to convention center building and got conduit piled in back and used that up first. Purchased remaining needed conduit and fittings
- Installed conduit in ditch from transformer into bumper car building and then from transformer to food stand building
- Assisted pulling wires through conduit with electricians helpers
- Pressurized water lines to test – o.k
- Backfilled ditch and rough graded out (if finish grading is needed we can do that for you just didn't want to do something that you already have someone else assigned to)
- Water lines still need tied into both buildings once those plans are finalized but not apart of this invoice.

All labor and materials unless specifically specified in contract are included in

Licensed

Fully Insured

the final price of \$.00 Invoice due within 10 days of the date listed above. Failure to pay within 10 days results in an added charge of 2% each week. Invoice payable by cash, checks, or credit card. If paying by credit card a transaction fee of 4.5% of total will be added. Any bounced checks will have a fee of \$50.00. Please make checks payable to DC Contracting and if necessary mail checks to the address listed above.

Thank you.

Licensed

Fully Insured

DC Plumbing and Contracting
11008 W. Townline Rd.
Conneaut Lake Pa 16316
Cell 1 814-282-6437
Cell 2 814-282-0413
Office 814-382-2300
DC_Contracting@hotmail.com

[Pennsylvania Home Improvement Contractor Registration Number PA058538]

Invoice Date: 7-5-2021

Invoice for work completed at: Conneaut Lake Park
New Bathroom Building
Tiki Bar
Kiddieland
Bathrooms near ninja warrior course
Bathrooms near bumper car building

New Bathroom Building

- Installed wiring and breaker for temporary plug use at panel box so power could be used to build the building
- Put in PA 1 call to mark out ground for plumbing
- Put in 2nd PA 1 call for electrical line
- Excavated trench from front of building facing lake over to electrical panel near telephone pole
- Installed new 2" pvc conduit from panel box to building through foundation up through concrete floor for wiring
- Removed temporary plug setup and Installed permanent set up. 2 new dbl gang electric boxes below panel boxes and installed 4 separate 20 amp circuit breakers with 4 gfi plugs and exterior plug covers
- Excavated trench for new water line and sewer line into new bathroom building
- Disconnected old water line from curb stop valve and Installed new 1" water line onto existing curb stop valve
- Ran water line up to back side of building and installed new yard hydrant
- Removed cap off sewer line near manhole
- Installed new sewer line from site tee into new bathroom
- Backfilled ditch with gravel and lightly graded out yard
- Inside of the building had to much fill dirt. Excavated all the dirt out to get to a deeper depth for new sewer lines
- Installed all underground plumbing for bathrooms which includes the following:

Licensed

Fully Insured

Men's Bathroom

- 5 commodes 5 urinals
- 5 sinks
- 2 floor drains and water lines for trap primer
- 1 cleanout pipe
- All proper venting

Women's bathroom

- 9 commodes
- 5 sinks
- 2 floor drains and water lines for trap primer
- 1 Cleanout pipe
- All proper venting

Maintenance Closet

- 1 floor drain and water line for trap primer
- 1 sink Drain
- 2" Conduit for electric line

Water line

- Located main 8" water line on maps and did exploratory dig to confirm line
- Excavated trench around 8" main for room to work
- Excavated trench to expose gas main per gas companies request so that Trutech could bore ground for pipes
- Excavated trench in front of bathrooms over to side of building for new water line to tie into
- Installed 2" Water main underground and ran up through floor in utility room out to curb box location near front of building
- Installed 2" ips ball valve and fittings on main line in utility closet
- Installed 2" curb stop valve and curb box with needed adapters Ran water line from curb box through ditch over to side of bathrooms where it ties into main 2" line that Trutech pulled the new line up to
- Tapped 8" line twice with 2-2" lines and 2 corp stop valves with 2-8'x2" saddles
- Cut out section of concrete and removed concrete and dug up ground for
- Excavated trench down at the beach for water line Installed 2" ips ball valve on end of water line near tiki bar install 2"x1" reducer and ran 1" line into tiki bar
- Pressurized lines to test – ok
- Excavated trench for electric conduit from retaining wall over to tiki bar
- Backfilled all ditches and graded out
- Purchased water meter for bathrooms to install in utility room

Licensed

Fully Insured

Tiki Bar

- Cut out and jack hammered concrete and dug out trench for new water line electric line and drain line for tiki bar
- Installed new 4" pvc piping in trench for drain line and stubbed up 2' pvc pipe for drain
- Installed new septic tank riser extension and lid for access for 2" ball valve for water line. Reduced down to 1" water line and ran through trench into bar area
- Installed 3 bowl sink and connected water and drain line
- Excavated trench for new septic tank near retaining wall
- Picked up and installed new 500-gallon tank in ground
- Connected 4" pvc drain line into tank and installed 4' wye for floor drain in cooler pad excavated trench and installed 4" pvc piping to new floor drain location and backfilled ditch
- After location of cooler pad was changed dug up ground to disconnect piping and run drain line to new location
- Installed ejector pump in tank with check valve on drain line and installed drain line up under retaining wall up the hillside to the top
- Installed pvc piping with holes drilled out along backside of retaining wall to spray irrigate water onto hillside
- Excavated trench for electric line from corner of bar to new cooler location
- Cut and jack hammered concrete and removed for new conduit to be run
- Excavate trench from corner of bar under retaining wall and up hillside to telephone pole
- Ran ¾" conduit in trench and backfilled
- Ran ¾" conduit in small trench from corner of bar to corner post for future tv line
- Installed concrete in both trenches and finished
- Cleaned tiki bar and beach with all debris and hauled away several loads of debris
- Scraped concrete floor behind tiki bar and hosed down and scrubbed concrete to cleaned mud and debris
- Spread 5 tri axles of sand along beach
- Once we found out that an ice machine was going on the cooler pad we Determined a water line was going to need to serve the ice machine. Dug up ground to expose water line. Installed new ¾' water line over to cooler pad and installed ball valve.
- Installed water line under tiki bar to new pepsi machine
- Connected water line to ice maker

Kiddie Land

- Water line was hit up company building pole building

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- Dug up ground around pipe to expose pipe
- Cut out bad section of pipe and installed new pipe and fittings to repair leak
- Pressurized line to check-o.k
- Water line leaking on yard hydrant at front entrance of kiddie land
- Excavated trench to expose base of hydrant removed existing hydrant and installed new hydrant and backfilled ditch

Front bathrooms near ninja warrior course

- Tried to turn on water at curb stop valve. Unable to turn on valve corroded and rusted. And curb box was the wrong size for the proper curb key
- Excavated trench to work curb valve free
- Installed new 4" piping for new curb box
- Backfilled ditch and reinstalled cap
- Replaced 2 diaphragms in mens flush valve commodes
- Fixed leaks on 2 of the spuds on mens commodes
- Restored water to sinks and urinals
- Replaced 1 diaphragm on Womens commode
- Installed 2 new flush valves and parts
- Had to completely alter 1 1/4" copper water line to match new commodes
- Installed copper piping fittings valve and supply line and repair flange and new tank flush commode on end stall and restored water to all fixtures to test- o.k
- Installed 1.5" galvanized cap on old drain line in front storage room
- Installed boiler drain to cap off unused water line
- Installed bleeder cap on old gate valve in middle utility area in between bathrooms

Bathroom near bumper car building

- Disconnected and removed broken commode
- Ordered new commode
- Found sewer to be clogged and bathrooms trashed with garbage
- Ran electric eel and cables through drain line to free obstructions
- Removed towel wipes and lots of roots
- Pulled 2nd commode to remove even more roots
- Installed 2 new repair flanges
- Reinstalled 1 existing commode and 1 new commode
- Cleaned garbage up and swept up bathroom again and advised to keep locked

Licensed

Fully Insured

Food stand on Park ave (in front of old tumble bug

- Connected water line to food stand that we previously ran underground and left stubbed up for future connection

All labor and materials unless specifically specified in contract are included in the final price of \$38,880.00 Invoice due within 10 days of the date listed above. Failure to pay within 10 days results in an added charge of 2% each week. Invoice payable by cash, checks, or credit card. If paying by credit card a transaction fee of 4.5% of total will be added. Any bounced checks will have a fee of \$50.00. Please make checks payable to DC Contracting and if necessary mail checks to the address listed above.

Thank you.

Licensed

Fully Insured

DC Plumbing and Contracting
11008 W. Townline Rd.
Conneaut Lake Pa 16316
Cell 1 814-282-6437
Cell 2 814-282-0413
Office 814-382-2300
DC_Contracting@hotmail.com

[Pennsylvania Home Improvement Contractor Registration Number PA058538]

Invoice Date: 7-21-2021

Invoice for work completed at: Conneaut Lake Park

All areas throughout the Water Park including Main pump room

- Located several parts scattered about area
- Some bolts nuts ect. were missing and had to be purchased and installed
- Cleaned all valve and pump parts found
- Lubricated and reassembled
- Reassembled chemical pumps and connected input locations and mounted to wall
- Installed three new pressure gauges on sand filters
- Installed two boiler drain connections and shut off valves on large filter tanks
- Installed all pvc plugs on filter system
- Installed drain plugs on pumps and housing
- Cleaned air vent ports on system and lubricated
- Replaced gaskets and several bolts and nuts
- Installed new 8" valve on lake side pump to water slide
- Greased all pumps motors and bearings
- Removed and disassembled lazy river pump to align with housing
- Welded to plates to secure
- Pulled pump apart to check impeller on lazy river pump
- Suggested having Jaime at Barber Chemicals to order new ones
- Said he could expedite quicker
- Reassembled and primed unit
- Found broken parts on other water slide pump
- Removed and Disassembled pump - installed new couplers and cushion seal and Reassembled
- Weeks later one of the water pumps shafts sheared off
- Disassembled and removed
- found old shaft to use for parts
- Took to Lubinecki's welding and Equipment to have bearing and seals pressed off and new ones pressed on

Licensed

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- Installed new coupler and cushion coupler and reassembled
- Extended 4" drain in pump room pit
- Installed clean out adapter with plug for drainage
- Back washed large tanks to remove debris
- Ordered new seal for water slide
- Back washed water slide sand filters several times and rinsed
- Repaired leak on two sand filters
- O rings needed
- Filled system and bled out air
- Cleaned and pressure washed pump room
- Cleaned and installed two doors with lock and key for chemical storage area as requested by DEA
- Hung new key and identified in pump room
- Repaired three leaks on water slide
- Cleaned ports on top of slide
- Patched area of slide to prevent cuts and scratches
- Scrapped moss dirt and weeds growing on stairs and landings to water slide
- Dug water line in curb box to find and turn on water to slide
- Removed test plugs in water slide pool
- Removed parts of test plugs in main 8" line that had broken off and jammed in lines
- Worked with company that were dye testing to try to identify leaks
- Drained pools and pressure washed and refilled
- Screwed loose boards on kiddie pool side decking to prevent trip hazard
- Replaced flapper in girls room toilet
- Repaired leak on kiddie slide water jet valve
- Removed old 2" valve and installed new 2" ball valve, nipple and adapters on kiddie pool filter system line
- Removed old valve to kiddie pool water fill line
- Installed new 2" ball valve and fittings
- Installed valve and drain connections on 4" line to filters
- Exposed curb box and turned on water to kiddie slide restroom area
- Rewashed drain off valve at ground level
- Brought main lazy river pump from convention building and installed and wired
- Found drive and shear pins missing
- Picked up new ones and disassembled pump motor installing new pins and parts missing
- Reassembled and greased
- Checked oil levels in motor
- Repaired leak on pvc union on 8" pump line
- Unit should have new seal in future
- Installed 4" pipe to drain water back to lazy river
- Installed main plug on 4" water spouts
- Cleaned all jets and adjusted

Licensed

Fully Insured

- Drained lazy river various times
- To pressure wash and remove debris ect. After storms
- Cleaned all filter baskets and removed debris from all water daily
- Checked and added shock chlorination to lazy river daily until parts arrive so that it can be automatically injected through cat pumps in pump room
- Cleaned water fall on lazy river and repacked control valve
- Removed debris and set up chemical in kiddie slide area
- Replace relief valve on hot water heater
- Replaced sink faucet in restroom
- Replaced p-trap in same restroom
- Connected circuit breaker to water heater, turned on and tested
- Removed 2" ball valve to lazy river
- Picked up new ball valve and fittings and section of pipe and installed
- Weed wacked and cut grass in water park several times to keep from getting into water and into the filter systems
- Suggest camera to check leak in lazy river in off season
- Leak maybe able to be lined without major excavation needed
- Will need to return to install seals when parts arrive (Labor will be in addition to this invoice)
- Installed hydrostatic check valves in lazy river
- Have been turning system on and off and opening and closing necessary valves during days the water park is not opened

New bathroom building

- Scheduled sewer inspection and Ran camera through sewer line for inspection - passed - ok
- Purchased commodes, urinals, flush valves
- Installed new water meter
- Ran 2" main copper water line down center of building and branched off for each individual fixture with 1" lines to commodes and 3/4" lines to urinals
- Installed lines for hose bib in each bathroom
- Installed lines for laundry tub sink
- Ran a 1" main line for all sinks and branched off with 1/2" to each individual sink
- Installed all drain line connections for urinals and sinks
- Installed commode flanges and secured to floor
- Installed all vent piping and connected together in attic for 1 stub out through roof (left just short of roof for future stub out. Cut piece to fit for guys doing the metal and left sitting in rafters)
- Spread 2 round bails of hay around bathroom building and burnout pad

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Tiki Bar/ Beach

- Spread 3 tri axles truckloads of sand
- Cleaned up job debris from tiki bar and cooler building and hauled away
- Picked up 20 gallons of diesel for skid steer
- Excavated ground to expose 12" main storm drain broken
- Installed hose bib connection on water line near sink

Kiddie Land bathroom

- Commode leaking on floor
- Pulled up commode and installed new wax ring and bolts and reset commode
- Tested - ok

All labor and materials unless specifically specified in contract are included in the final price of \$34,600.00 Invoice due within 10 days of the date listed above. Failure to pay within 10 days results in an added charge of 2% each week. Invoice payable by cash, checks, or credit card. If paying by credit card a transaction fee of 4.5% of total will be added. Any bounced checks will have a fee of \$50.00. Please make checks payable to DC Contracting and if necessary mail checks to the address listed above.

Thank you.

Licensed

Fully Insured

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Cell 1 814-282-6437
Cell 2 814-282-0413
Office 814-382-2300
DC_Contracting@hotmail.com

[Pennsylvania Home Improvement Contractor Registration Number PA058538]

Invoice Date: 8-24-2021

Invoice for work completed at: Conneaut Lake Park

Comstock St.

• Service call to check water leak when township hit water line on Comstock st.
Installed fittings to cap off water line- o.k

Reed Ave.

- Put in PA 1 call
- Excavated alongside road to expose water leak
- Shut down water system
- Pumped out water in ditch
- Found hole in pipe
- Installed repair clamp sleeve over broken section
- Pressurized system back up to test for leaks- ok
- Backfilled ditch and rough graded out ground
- Left cones up along road so it won't get driven over until ground dries out
- * Completely separate job just make note - Finish grade, Top soil work, grass seed and black top all still need done but none of which is included in this invoice

All labor and materials unless specifically specified in contract are included in the final price of \$2,100.00 Invoice due within 10 days of the date listed above. Failure to pay within 10 days results in an added charge of 2% each week. Invoice payable by cash, checks, or credit card. If paying by credit card a transaction fee of 4.5% of total will be added. Any bounced checks will have a fee of \$50.00. Please make checks payable to DC Contracting and if necessary mail checks to the address listed above.

Thank you.

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[Pennsylvania Home Improvement Contractor Registration Number PA058538]

Invoice Date: 9-21-2021

Invoice for work completed at: Conneaut Lake Park Todd Joseph
Conneaut Lake, Pa 16316

12492 Comstock st.

- Put in pa 1 call
- Shut down water system
- Excavated ground to expose water leak
- Found break on 4" main line
- Water main pipe is in very bad condition; had to weld piece of metal onto pipe and sealed over with 4" repair clamp
- pressurized system back up – o.k
- Backfilled ditch and spread hay and grass seed
- (In your future plans you'll need to factor in a new 4" water main replacement as this pipe is in very bad condition) \$1,700

10944 henry st.

- Put in pa 1 call
- Shut down water system
- Excavated ground to expose water leak
- Found break on 2" main line
- Installed 2' repair clamp
- pressurized system back up – o.k
- backfilled ditch and graded out \$1,200

All labor and materials unless specifically specified in contract are included in the final price of \$2,900.00 Invoice due within 10 days of the date listed above. Failure to pay within 10 days results in an added charge of 2% each week. Invoice payable by

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cash, checks, or credit card. If paying by credit card a transaction fee of 4.5% of total will be added. Any bounced checks will have a fee of \$50.00. Please make checks payable to DC Contracting and if necessary mail checks to the address listed above.

Thank you.

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[Pennsylvania Home Improvement Contractor Registration Number PA058538]

Invoice Date: 10-5-2021

Invoice for work completed at: Conneaut Lake Park Todd joseph
Conneaut Lake, Pa 16316

Bumper car bathroom building

- Service call to check clogged sewer in men's and women's bathrooms
- Ran snake through floor drain to free obstructions
- Ran water to test- o.k
- Hosed down floors and scrubbed floors

All labor and materials unless specifically specified in contract are included in the final price of \$250.00 Invoice due within 10 days of the date listed above. Failure to pay within 10 days results in an added charge of 2% each week. Invoice payable by cash, checks, or credit card. If paying by credit card a transaction fee of 4.5% of total will be added. Any bounced checks will have a fee of \$50.00. Please make checks payable to DC Contracting and if necessary mail checks to the address listed above.

Thank you.

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Cell 2 814-282-0413
Office 814-382-2300
DC_Contracting@hotmail.com

[Pennsylvania Home Improvement Contractor Registration Number PA058538]

Invoice Date: 10-15-2021

Invoice for work completed at: Conneaut Lake Park
10895 Center St.
Conneaut Lake, Pa 16316

Put in pa 1 call to mark utilities
Excavated ground to locate water leak
Found leak on 2" water line
Shut down system to drain pressure off lines
Installed repair clamp on leak
Hauled in gravel Installed gravel in trench around pipe
Hauled away 2 dump truck loads of mud
Backfilled trench and graded out yard roughly

** Not included in this invoice

Yard will need some top soil grass seed and hay
Road once packed in will need excess gravel removed and cold patch black top
We can do this if you want or if not maybe have Allen do it. But in order to keep the homeowner happy and road safe I would highly recommend it. This roadway is the only entranceway to for the people that live back there.

All labor and materials unless specifically specified in contract are included in the final price of \$1,900.00 Invoice due within 10 days of the date listed above. Failure to pay within 10 days results in an added charge of 2% each week. Invoice payable by cash, checks, or credit card. If paying by credit card a transaction fee of 4.5% of total will be added. Any bounced checks will have a fee of \$50.00. Please make checks payable to DC Contracting and if necessary mail checks to the address listed above.

Thank you.

Licensed

Fully Insured

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Cell 2 814-282-0413
Office 814-382-2300
DC_Contracting@hotmail.com

[Pennsylvania Home Improvement Contractor Registration Number PA058538]

Invoice Date: 10-15-2021

Invoice for work completed at: Conneaut Lake Park
Henry St.
Conneaut Lake, Pa 16316

Put in pa 1 call to mark utilities
Excavated ground to locate water leak
Found leak on 2" water line
Shut down system to drain pressure off lines
Installed repair clamp on leak
Hauled in gravel Installed gravel in trench in the road
Hauled away 2 dump truck loads of mud
Backfilled trench
Hauled in 2a limestone gravel and spread over section of road

** Not included in this invoice
Yard will need some top soil grass seed and hay

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Thank you.

BUREAU OF INVESTIGATION AND ENFORCEMENT INTERROGATORIES

CONNEAUT LAKE PARK WATER CORPORATION, INC.

Docket No. R-2023-3041575

Engineer: Ethan H. Cline

I&E-RB-2 Reference TUS-1-1 Attachment 3, included in the Company's Responses to Set 1 Data Requests. Provide any invoices or related documentation associated with the \$89,000 Transmission and Distribution Mains plant additions claimed in the year ended 12/31/2022.

RESPONSE:

See attached Exhibit RB-2

Responsible Witness: Todd Joseph
Date: 11/14/23

347251

AS concrete
2050 Burgess Drive 104
Uniontown Ohio 44685

Invoice

SOLD TO		SHIP TO	
ADDRESS		ADDRESS	
CITY, STATE, ZIP		CITY, STATE, ZIP	
CUSTOMER ORDER NO.	TERMS	F.O.B.	DATE
CHP water park LLC			8-24-22
11 Water Tower lot "			
Concavit haxbe PA 16316			
SOLD BY	TERMS	F.O.B.	DATE
AS concrete			

ORDERED	SHIPPED	DESCRIPTION	PRICE	UNIT	AMOUNT
		- Removal of All trees on water tower lot, Clearing and Removing All Brush, Weeds, Roots on adjacent lots to water tower. 34 total trees			
		- Running conduit for power lines to water tower.			
		- 30 DAY GUARANTEE ON ALL WORK			
					\$413,000.00

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DC_Contracting@hotmail.com

[Pennsylvania Home Improvement Contractor Registration Number PA058538]

Invoice Date: 3-24-2022

Invoice for work completed at: Conneaut Lake Park Todd Joseph
Conneaut Lake, Pa 16316

Reed Ave. 1st house on left past the convention center building

- Cut down extension rod on curb stop valve
- Picked up new curb box and had to cut down to fit over top of rod and valve
- Backfilled ditch

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Thank you.

Licensed

Fully Insured

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[Pennsylvania Home Improvement Contractor Registration Number PA058538]

Invoice Date: 4-18-2022

Invoice for work completed at: Todd Joseph Conneaut Lake Park

Camperland

Put in Pa 1 call
Moved deck further out of the way
Scraped back gravel to save
Excavated ground to expose water leak
Found bad section of pipe
Cut out and replaced about 2'ft section of pipe with compression couplings
Backfilled ditch
Spread gravel back out

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Thank you.

Licensed

Fully Insured

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DC_Contracting@hotmail.com

[Pennsylvania Home Improvement Contractor Registration Number PA058538]

Invoice Date: 4-21-2022

Invoice for work completed at: Todd Joseph Conneaut Lake Park

Camperland

Put in Pa 1 call for 2 locations

Lot #40

Dug up ground at curb stop valve

Found there was no water line attached to curb stop valve. So when the valve was turned on it leaked right into the ground

Put curb box back over extension rod and backfilled ditch

Lot #7

Put in pa 1 call

Upon digging 1st curb box up and finding it completely disconnected, we talked to Allan and decided not to dig this one up at this time

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Thank you.

Licensed

Fully Insured

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DC_Contracting@hotmail.com

[Pennsylvania Home Improvement Contractor Registration Number PA058538]

Invoice Date: 5-3-2022

Invoice for work completed at: Conneaut Lake Park Todd Joseph
Conneaut Lake, Pa 16316

Hotel

- Put in PA 1 call
- Dug up ground to expose leak
- Found leak and installed repair clamp
- Pressurized line to test and found 2nd leak further under concrete porch
- Shut down water and dug out further to expose leak
- Cut out section of pipe and installed 2 compression couplings and short section of pipe
- Pressurized line to test o.k
- Backfilled ditch

House on park Ave.

- Dug around to locate curb box once located Paul brought excavator over and dug up ground
- Pick up and Installed new curb box around curb key extension

All labor and materials unless specifically specified in contract are included in the final price of \$2,100.00 Invoice due within 10 days of the date listed above. Failure to pay within 10 days results in and added charge of 2% each week. Invoice payable by cash, checks, or credit card. If paying by credit card a transaction fee of 4.5% of total will be added. Any bounced checks will have a fee of \$50.00. Please make checks payable to DC Contracting and if necessary mail checks to the address listed above.

Thank you.

Licensed

Fully Insured

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11008 W. Townline Rd.
Conneaut Lake Pa 16316
Cell 1 814-282-6437
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Office 814-382-2300
DC_Contracting@hotmail.com**

[Pennsylvania Home Improvement Contractor Registration Number PA058538]

Invoice Date: 6-8-2022

Invoice for work completed at: Camperland
Hwy 618
Conneaut Lake, Pa 16316

- Replaced flush valve on urinal in mens restroom
- Turned water off to camperland
- Excavated ground to expose water leak
- Found leak on fitting and split pipe
- Replaced section of pipe and fittings and pressurized line – o.k
- Backfilled ditch
- Replaced 2 different hose bibs on 2 different trailers

All labor and materials unless specifically specified in contract are included in the final price of \$950.00 Invoice due within 10 days of the date listed above. Failure to pay within 10 days results in and added charge of 2% each week. Invoice payable by cash, checks, or credit card. If paying by credit card a transaction fee of 4.5% of total will be added. Any bounced checks will have a fee of \$50.00. Please make checks payable to DC Contracting and if necessary mail checks to the address listed above.

Thank you.

Licensed

Fully Insured

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DC_Contracting@hotmail.com

[Pennsylvania Home Improvement Contractor Registration Number PA058538]

Invoice Date: 6-23-2022

Invoice for work completed at: Conneaut Lake Park

- Leak on Park Ave across from Paratrooper ride
- Put in PA 1 call
- Excavated ground to expose water leak
- Found old curb stop valve rusted out and leaking
- Shut down water
- Cut out old curb stop valve
- Installed new compression coupling and cap to deaden off line
- Backfilled ditch

All labor and materials unless specifically specified in contract are included in the final price of \$900.00 Invoice due within 10 days of the date listed above. Failure to pay within 10 days results in an added charge of 2% each week. Invoice payable by cash, checks, or credit card. If paying by credit card a transaction fee of 4.5% of total will be added. Any bounced checks will have a fee of \$50.00. Please make checks payable to DC Contracting and if necessary mail checks to the address listed above.

Thank you.

Licensed

Fully Insured

DC Plumbing and Contracting
11008 W. Townline Rd.
Conneaut Lake Pa 16316
Cell 1 814-282-6437
Cell 2 814-282-0413
Office 814-382-2300
DC_Contracting@hotmail.com

[Pennsylvania Home Improvement Contractor Registration Number PA058538]

Invoice Date: 7-16-2022

Invoice for work completed at: Conneaut Lake Park

Tiki bar

- Service call to check hot water at tiki bar
- Found It was never connected
- Purchased new 3 bowl sink faucet
- Drilled stainless steel sink and mounted faucet
- Used to pex lug el's to connected faucet to pex water lines
- Ran hot water line from water heater to new faucet and existing faucet on right hand side
- Connected supply lines and installed 1 shutoff valve
- Pressurized lines to test -o.k
- Turned on heater and had it ready for health department to inspect next morning
- Passed inspection

All labor and materials unless specifically specified in contract are included in the final price of \$625.00 Invoice due within 10 days of the date listed above. Failure to pay within 10 days results in and added charge of 2% each week. Invoice payable by cash, checks, or credit card. If paying by credit card a transaction fee of 4.5% of total will be added. Any bounced checks will have a fee of \$50.00. Please make checks payable to DC Contracting and if necessary mail checks to the address listed above.

Thank you.

Licensed

Fully Insured

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Conneaut Lake Pa 16316
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DC_Contracting@hotmail.com

[Pennsylvania Home Improvement Contractor Registration Number PA058538]

Invoice Date: 7-24-2022

Invoice for work completed at: Camperland

Lot 71

- Put in pa 1 call to mark utilities
- Excavated ground to expose leak in street
- Found leak on insert fitting adapted to curb stop
- The fitting was plastic and broke whenever heavy equipment ran over curb box when road was put in
- Replaced section of pipe and installed stainless steel fitting to curb stop
- Installed new curb box
- Pressurized line to test -o.k
- Backfilled ditch

Empty field in back of camperland

- Put in pa 1 call to mark utilites
- Excavated ground to find water leak
- Found curb stop and found 1.5" line ripped out of curb stop
- Cut out section of pipe and installed new brass insert fitting to curb stop
- Installed brass plug to deaden off line
- Curb box was bent installed new curb box we took from convention building
- Backfilled ditch

All labor and materials unless specifically specified in contract are included in the final price of \$2,400.00 Invoice due within 10 days of the date listed above. Failure to pay within 10 days results in and added charge of 2% each week. Invoice payable by cash, checks, or credit card. If paying by credit card a transaction fee of 4.5% of total

Licensed

Fully Insured

will be added. Any bounced checks will have a fee of \$50.00. Please make checks payable to DC Contracting and if necessary mail checks to the address listed above.

Thank you.

Licensed

Fully Insured

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Conneaut Lake Pa 16316
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Cell 2 814-282-0413
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DC_Contracting@hotmail.com

[Pennsylvania Home Improvement Contractor Registration Number PA058538]

Invoice Date: 7-25-2022

Invoice for work completed at: Conneaut Lake Park

Reed Ave. corner of convention center building

- Put in PA 1 call
- Excavated ground to find leak
- Found 1st leak and fixed
- Found a 2nd leak and fixed
- Found a 3rd leak and suggested removing the line completely back to corp stop since area will have new concrete and blacktop.
- Next day we returned and began excavating all the way back to the main 6" line in the middle of the street
- Once we got several feet back into the road- per Allan and Todds request we cut out line and capped off instead of continuing to dig back to corp stop.
- Backfilled ditch
- 2 days later we got a call to the same spot for another additional leak
- Returned the beginning of the next week on Monday to continue digging back further towards the main line
- Excavated street back to main line and found leak on lead fitting right at corp stop valve
- Shut off corp stop valve and put a 1" plug in line
- Backfilled ditch

All labor and materials unless specifically specified in contract are included in the final price of \$4800.00 Invoice due within 10 days of the date listed above. Failure to pay within 10 days results in and added charge of 2% each week. Invoice payable by cash, checks, or credit card. If paying by credit card a transaction fee of 4.5% of total will be added. Any bounced checks will have a fee of \$50.00. Please make checks

Licensed

Fully Insured

payable to DC Contracting and if necessary mail checks to the address listed above.

Thank you.

Licensed

Fully Insured

**DC Plumbing and Contracting
11008 W. Townline Rd.
Conneaut Lake Pa 16316
Cell 1 814-282-6437
Cell 2 814-282-0413
Office 814-382-2300
DC_Contracting@hotmail.com**

[Pennsylvania Home Improvement Contractor Registration Number PA058538]

Invoice Date: 8-16-2022

Invoice for work completed at: Camperland

Service call to check clogged sewer
Ran electric eel and cables about 62' ft through drain line to free obstructions
Pulled out tampons and fine roots
Ran water through drain to test o.k

All labor and materials unless specifically specified in contract are included in the final price of \$225.00 Invoice due within 10 days of the date listed above. Failure to pay within 10 days results in an added charge of 2% each week. Invoice payable by cash, checks, or credit card. If paying by credit card a transaction fee of 4.5% of total will be added. Any bounced checks will have a fee of \$50.00. Please make checks payable to DC Contracting and if necessary mail checks to the address listed above.

Thank you.

Licensed

Fully Insured

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Conneaut Lake Pa 16316
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Cell 2 814-282-0413
Office 814-382-2300
DC_Contracting@hotmail.com

[Pennsylvania Home Improvement Contractor Registration Number PA058538]

Invoice Date: 11-19-2022

Invoice for work completed at: Conneaut Lake Park

- Put in PA 1 call for sewer line excavation
- Excavated side of building to locate water line and backfilled (left marker stubbed above ground for future reference
- Excavated to find septic tank in rear of building
- Had tank pumped out (owner paid for)
- Jackhammered corner of concrete and rebar of tank for future connection
- Filled tank with sand - per sewer authority requirement
- Ran Camera through sewer line from corner of camper to main and found it to be 6' SDR pipe
- Excavate trench from septic tank to corner of camper
- Picked up SDR piping and fittings
- Installed new piping in ditch and filled around pipe with sand
- Installed site tee behind restrooms
- Installed cleanout at corner of camper
- Backfilled ditch
- Installed caution tape about 1'ft deep in trench
- Sewer authority inspected plumbing and approved

All labor and materials unless specifically specified in contract are included in the final price of \$4,100.00 Invoice due within 10 days of the date listed above. Failure to pay within 10 days results in an added charge of 2% each week. Invoice payable by cash, checks, or credit card. If paying by credit card a transaction fee of 4.5% of total will be added. Any bounced checks will have a fee of \$50.00. Please make checks payable to DC Contracting and if necessary mail checks to the address listed above. Thank you.

Licensed

Fully Insured

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Conneaut Lake Pa 16316
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DC_Contracting@hotmail.com

[Pennsylvania Home Improvement Contractor Registration Number PA058538]

Invoice Date: 12-30-2022

Invoice for work completed at: Conneaut Lake Park
Comstock st.
Conneaut Lake, Pa 16316

Service call to check water leak in basement
Found pipe rusted out
Cut out and removed section of sewer line to gain access
Removed laundry tub sink
Broke out concrete block around pipe
Cut off water line back into foundation wall
Installed new piping and fittings and boiler drain on end in case water was needed

All labor and materials unless specifically specified in contract are included in the final price of \$450.00 Invoice due within 10 days of the date listed above. Failure to pay within 10 days results in an added charge of 2% each week. Invoice payable by cash, checks, or credit card. If paying by credit card a transaction fee of 4.5% of total will be added. Any bounced checks will have a fee of \$50.00. Please make checks payable to DC Contracting and if necessary mail checks to the address listed above.

Thank you.

**BUREAU OF INVESTIGATION AND ENFORCEMENT INTERROGATORIES
SET RB (NOS. 1 & 2)**

CONNEAUT LAKE PARK WATER CORPORATION, INC.

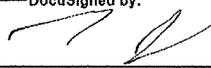
Docket No. R-2023-3041575

Analyst: Cline

VERIFICATION

I, Todd Joseph, hereby state that the averments set forth in the foregoing Responses Nos. 1 & 2 to IE Interrogatories Set RB (Nos. 1 & 2) - Cline at Docket No. R-2023-3041575, are true and correct to the best of my knowledge, information, and belief. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Dated: 11/14/2023

DocuSigned by:

6A20AA5408754A8...
Todd Joseph

I&E Exhibit G

BUREAU OF INVESTIGATION AND ENFORCEMENT INTERROGATORIES

CONNEAUT LAKE PARK WATER CORPORATION, INC.

Docket No. R-2023-3041575

Engineer: Ethan H. Cline

I&E-RB-3 Provide all instances, dates, and amounts of tap in fees collected from both new and existing customers since the transfer of ownership of Conneaut Park Water Corporation, Inc. to the current owner.

RESPONSE:

After a thorough search of the Company's records, we have been unable to locate any records reflecting the tap fees referenced above. The Company recalls fees in the amount of \$7,500 associated with 2 builders of new construction, but cannot recall their names, and has not found any records of those amounts, in fact, being invoiced by or being paid to the Company. No fees other than fees allowed under the tariff were collected from existing customers an any time.

Responsible Witness: Todd Joseph
Date: January 29, 2024

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement,	:	
Petitioner	:	
	:	
v.	:	Docket Nos. P-2024-
	:	I-2024-
Conneaut Lake Park Water Corporation, Inc.	:	
Respondent	:	

CERTIFICATE OF SERVICE

I hereby certify that I am serving the foregoing **I&E Petition to Request the Commission Open a Section 529 Investigation into the Acquisition of Conneaut Lake Park Water Corporation, Inc.** dated October 28, 2024, in the manner and upon the persons listed below.

Served via Electronic Mail Only

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Reynolds Water Company
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Greenville, PA 16125
grdc@greenvillereynolds.com

Served via First Class Mail Only

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395 High Street
P.O. Box 345
Conneaut Lake, PA 16316

Linesville Municipal Water Authority
103 W. Erie Street
Linesville, PA 16424

Vernon Township Water Authority
16678 McMath Avenue
Meadville, PA 16335

Saegertown Water Department
603 Erie Street
P.O. Box 558
Saegertown, PA 16433

Greenville Water Authority
44 Clinton Street
Greenville, PA 16125


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