

COMMONWEALTH OF PENNSYLVANIA



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November 12, 2024

Via Electronic Filing

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

Re: I&E Petition to Request the Commission
Open a Section 529 Investigation into the
Acquisition of Conneaut Lake Park Water
Corporation, Inc.
Docket Nos. P-2024-3051855
I-2024-3051857

Dear Secretary Chiavetta:

Attached for electronic filing please find the Office of Consumer Advocate's Notice of Intervention and Public Statement in the above-referenced proceeding.

Copies have been served as indicated on the enclosed Certificate of Service.

Respectfully submitted,

/s/ Jacob D. Guthrie
Jacob D. Guthrie, Esq.
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Enclosures:

cc: The Honorable Arlene Ashton (**email only**: aashton@pa.gov)
The Honorable Eranda Vero (**email only**: evero@pa.gov)
Certificate of Service

CERTIFICATE OF SERVICE

Pennsylvania Public Utility Commission, :
Bureau of Investigation and Enforcement :
 : Docket Nos. P-2024-3051855
 v. : I-2024-3051857
 :
 :
Conneaut Lake Park Water Corporation, Inc. :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate’s Notice of Intervention and Public Statement, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a participant), in the manner and upon the persons listed below.

Dated this 12th day of November, 2024.

SERVICE BY E-MAIL ONLY

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Greenville Water Authority
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Greenville, PA 16125

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

Saegertown Water Department
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Saegertown, PA 16433

Respectfully Submitted,

/s/ Harrison W. Breitman
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Dated: November 12, 2024

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

I&E Petition to Request the Commission :
Open a Section 529 Investigation into the : Docket Nos. P-2024-3051855
Acquisition of Conneaut Lake Park Water : I-2024-3051857
Corporation, Inc. :

NOTICE OF INTERVENTION
OF THE
OFFICE OF CONSUMER ADVOCATE

Pursuant to 52 Pa. Code Sections 5.71-74, the Office of Consumer Advocate (OCA) hereby gives Notice of Intervention in the captioned proceedings. The OCA deems it necessary to participate in this proceeding to protect the interests of the named utility's consumers. A copy of all correspondence and notices, documents, orders or other communications with respect to the captioned proceeding should be addressed to the undersigned counsel on behalf of the OCA.

Respectfully submitted,

/s/ Harrison W. Breitman
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Counsel for:
Patrick M. Cicero
Consumer Advocate

Dated: November 12, 2024

PUBLIC STATEMENT OF THE
OFFICE OF CONSUMER ADVOCATE
PURSUANT TO 71 P.S. SECTION 309-4(e)

Act 161 of the Pennsylvania General Assembly, 71 P.S. Section 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (Commission). In accordance with Act 161, and for the following reasons, the Consumer Advocate determined to file a Notice of Intervention and participate in this proceeding before the Commission involving an investigation into whether the Commission should order a capable public utility to acquire Conneaut Lake Park Water Corporation, Inc. (CLPWC or Company), a jurisdictional water utility.

On October 28, 2024, the Bureau of Investigation and Enforcement (I&E) filed a Petition, captioned “Petition to Request the Commission Open a Section 529 Investigation into the Acquisition of Conneaut Lake Park Water Corporation, Inc.” (Petition). CLPWC serves approximately 165 customers, 162 of whom are residential customers. The purpose of the Petition is to determine whether the Commission should open an investigation to order a capable public utility to acquire CLPWC.

In the Petition, I&E supported its request for the Commission to initiate a Section 529 investigation for CLPWC because the Company has been in violation of numerous provisions of the Public Utility Code and Commission regulations, including the requirement to meter customers in accordance with 51 Pa. Code Section 65.7. Further, there are significant water quality issues plaguing the system and affecting its customers, in addition to justifiable concerns regarding the managerial fitness of CLPWC. In the Settlement Agreement resolving the Company’s 2023 rate increase request, docketed at R-2023-3041575, I&E agreed to initiate the instant Section 529

proceeding to enable another, capable public utility or municipal corporation or authority to acquire the system.

The Consumer Advocate has determined that it is necessary to participate in this proceeding to protect the interests of CLPWC's customers and as a party to the above-referenced Settlement Agreement. The Office of Consumer Advocate will seek to ensure that adequate service is provided to all customers at just and reasonable rates and in accordance with applicable statutes and regulations.