



COMMONWEALTH OF PENNSYLVANIA

November 12, 2024

**E-FILED**

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

**Re: The Pennsylvania Public Utility Commission's Bureau of Investigation and Enforcement's 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:

Enclosed please find the Notice of Intervention, Public Statement and Verification, on behalf of the Office of Small Business Advocate ("OSBA"), in the above-referenced proceedings.

Copies will be served on all known parties in these proceedings, as indicated on the attached Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

*/s/ Rebecca Lyttle*

Rebecca Lyttle  
Assistant Small Business Advocate  
Attorney ID No. 201399

*Enclosures*

cc: Kevin Higgins  
Parties of Record

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**The Pennsylvania Public Utility Commission’s     :**  
**Bureau of Investigation and Enforcement’s     :**     **Docket Nos.   P-2024-3051855**  
**Petition to Request the Commission Open a     :**                     **I-2024-3051857**  
**Section 529 Investigation into the Acquisition   :**  
**of Conneaut Lake Park Water Corporation, Inc. :**

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**NOTICE OF INTERVENTION  
OF THE OFFICE OF SMALL BUSINESS ADVOCATE**

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The Office of Small Business Advocate (“OSBA”) files this Notice of Intervention with respect to the October 28, 2024, filing of the Investigation & Enforcement’s (I&E) Petition to Request the Public Utility Commission (“Commission”) to open a Section 529 Investigation into the Acquisition of Conneaut Lake Park Water Corporation, Inc. (“Company”). In support of this Notice of Intervention, the OSBA avers as follows:

1. The OSBA is an agency of the Commonwealth of Pennsylvania authorized by the Small Business Advocate Act (Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50) to represent the interest of small business consumers as a party in proceedings before the Commission.

2. Representing the OSBA in this proceeding is:

Rebecca Lyttle, Esq.  
Assistant Small Business Advocate  
Office of Small Business Advocate  
Forum Place  
555 Walnut Street, 1st Floor  
Harrisburg, PA 17101  
(717) 783-2525  
[relyttle@pa.gov](mailto:relyttle@pa.gov)

Respectfully submitted,

*/s/ Rebecca Lyttle*

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Rebecca Lyttle  
Assistant Small Business Advocate  
Attorney I.D. No. 201399

For: NazAarah Sabree  
Small Business Advocate

Commonwealth of Pennsylvania  
Office of Small Business Advocate  
Forum Place  
555 Walnut Street, 1st Floor  
Harrisburg, PA 17101

Date: November 12, 2024

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**The Pennsylvania Public Utility Commission’s :  
Bureau of Investigation and Enforcement’s : Docket Nos. P-2024-3051855  
Petition to Request the Commission Open a : I-2024-3051857  
Section 529 Investigation into the Acquisition :  
of Conneaut Lake Park Water Corporation, Inc. :**

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**PUBLIC STATEMENT OF  
THE OFFICE OF SMALL BUSINESS ADVOCATE**

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The Small Business Advocate is authorized and directed to represent the interest of small business consumers of utility services in Pennsylvania under the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 (the “Act”). The Act further provides that the Small Business Advocate is to issue publicly a written statement stating concisely the specific interest of small business consumers to be protected by her initiation of or intervention in any proceeding involving those interests before the Public Utility Commission or any other agency or court.

This Public Statement relates to the filing (“Petition”) by 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 Regulations to open a Section 5292 investigation into whether the Commission should order a capable public utility to acquire Conneaut Lake Park Water Corporation, Inc (“Company”).

The Small Business Advocate files this Public Statement to protect the interests of the Company's small business customers that could be affected by the request set forth in the Petition.

The Small Business Advocate will participate in proceedings before the Public Utility Commission to investigate the reasonableness of proposals set forth in the Petition. The Small Business Advocate will ask the Commission to deny any aspect of the Petition that are not proven to be lawful, just, reasonable, and non-discriminatory.

Dated: November 12, 2024

**VERIFICATION**

I, NazAarah Sabree, 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: November 12, 2024

  
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(Signature)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**The Pennsylvania Public Utility Commission's** :  
**Bureau of Investigation and Enforcement's** :       **Docket Nos. P-2024-3051855**  
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**Section 529 Investigation into the Acquisition** :  
**of 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).

The Honorable Eranda Vero  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
801 Market Street, Suite 4063  
Philadelphia, PA 19107  
[evero@pa.gov](mailto:evero@pa.gov)

The Honorable Arlene Ashton  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
801 Market Street, Suite 4063  
Philadelphia, PA 19107  
[aashton@pa.gov](mailto:aashton@pa.gov)

Michael A. Podskoch, Jr., Esquire  
Allison Kaster, Esquire  
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Pennsylvania Public Utility Commission  
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Conneaut Lake, PA 16316  
[ds42@windstream.net](mailto:ds42@windstream.net)

Tera Powell  
719 10<sup>th</sup> Street  
New Brighton, PA 15066  
**(First Class Mail ONLY)**

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Meadville, PA 16335  
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Jamestown Municipal Water and Sewer  
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406 Jackson Street  
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Jamestown, PA 16134  
[jamestown@zoominternet.net](mailto:jamestown@zoominternet.net)

Conneaut Lake Joint Municipal Authority  
9888 State Highway 285  
P.O. Box 277  
Conneaut Lake, PA 16316  
[office@cljma.com](mailto:office@cljma.com)

DATE: November 12, 2024

/s/ Rebecca Lyttle  
Rebecca Lyttle  
Assistant Small Business Advocate  
Attorney I.D. No. 201399