

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**ANSWER TO PETITION OF RESPONDENT
CONNEAUT LAKE PARK WATER CORPORATION, INC.**

I. PARTIES

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied as stated. Admitted that the Respondent certificated public utility is owned and operated by a CLP Water Park LLC whose sole member is Todd Jospheh.
6. Denied as stated. See response to No. 5 above. Admitted that the registered address of the Respondent is 713 Broad Acres Road, Narbeth, PA 19702.

II. JURISDICTION

7. Admitted.
8. Denied. The allegations of Paragraph 8 of the Petition constitute a conclusion of law to which no response is required, which is deemed denied.
9. Denied. The allegations of Paragraph 9 of the Petition constitute a conclusion of law to which no response is required, which is deemed denied.

10. Denied. The allegations of Paragraph 10 of the Petition constitute a conclusion of law to which no response is required, which is deemed denied.

11. Admitted.

12. Admitted.

III. BACKGROUND

13. Admitted that Respondent is a small water utility as defined under Section 5299 that provides water service to approximately 162 residential customers and 3 commercial customers in Conneaut Lake, Pennsylvania, but denies that any customers are treated as seasonal from a rate perspective.

14. Admitted. By way of further answer, the Trustees also owned the water system.

15. Admitted.

16. Admitted that 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. Denied that Todd Jospeh is the owner of Keldon Holdings, LLC; rather Mr. Jospeh is the LLC's sole member.

17. Admitted.

18. Admitted.

19. Admitted.

20. Admitted.

21. Admitted.

22. Admitted.

23. Admitted.

24. Admitted.

25. Admitted that the Conneaut Lake Objectors made those allegations, but the truth of those allegations is denied.

26. Admitted.

27. Admitted.

28. Denied.

29. Admitted.

30. Admitted that many customers testified regarding various issues, but deny the truth of that testimony.

31. Admitted.

32. Admitted.

33. Admitted.

34. Admitted.

35. Admitted.

36. Admitted.

37. Denied as stated. Specifically, the Respondent stated, " Thus, the Settlement ensures that the long-term issues existing with the condition of the water system will be addressed, which is in the public interest." Further, the statement of the ALJs in the Recommended Decision was part of a section addressing Paragraphs 52-54 of the Settlement, which did not involve the filing of the 529 proceeding.

38. Admitted that these are water service providers, but Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations that such providers are capable and, therefore, deny the same.

39. Admitted.

WHEREFORE, although as part of the Settlement reached by the parties, the Respondent agreed to the initiation of a Section 529 proceeding, it 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, and Respondent respectfully requests that the Commission give it the opportunity to do so.

Respectfully submitted,



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VERIFICATION

I, Todd Joseph, Officer of Conneaut Lake Park Water Corporation, Inc., do hereby state that the facts set forth in the foregoing Answer to Petition of Respondent are true and correct to the best of my knowledge, information and belief. This Verification is made subject to the penalties of 18 Pa.C.S.A. § 4904 relating to intentional falsification to authorities.

DocuSigned by:

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Todd Joseph, Officer
Conneaut Lake Park Water Corporation, Inc.

Dated: November __, 2024

CERTIFICATE OF SERVICE

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

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