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January 23, 2026

VIA ELECTRONIC FILING

Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
Harrisburg, PA 17120

Re: Application of Mainlines, Manholes & Wastewater Treatment, Inc. for approval, *nunc pro tunc*, of the right to begin to offer, render, furnish, and supply wastewater service to the public in portions of Girard and Waterford Townships, Erie County, Pennsylvania at Docket No. A-2024-3050786; **TUS DATA REQUEST SET 1.**

Dear Secretary Homsher:

Enclosed for filing is Mainlines, Manholes & Wastewater Treatment Inc.'s ("MMWT") Response to TUS Data Request Set 1. Specifically, responses have been provided for request number 1, 2, 4, 6, 12, 23, 25, 30, 31, 34, 36, 37, 43, 44, 45, 47, and 50.

MMWT is submitting concurrently at this docket a request for extension to provide the remaining outstanding information.

Respectfully,

/s/ Kathryn Read-Fisher

Whitney E. Snyder
Kathryn C. Read-Fisher

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

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

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

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

PROVIDED BY: Stacy Luciano

DATE: October 3, 2024

SUPPLEMENTAL RESPONSE: The Application does not identify a “Waypoint Mobile Home Park.” Rather, Waypoint Property Management, LLC is an affiliated entity that owns and operates the Hickory Hill Country Village Mobile Home Park, as described in the Application. Accordingly, references in the Commission’s question to a “Waypoint Mobile Home Park” or “Waypoint Territory” reflect a misidentification of the ownership structure, not the existence of a separate mobile home park or service territory.

Copies of a legible map depicting the boundaries of the Requested Territory associated with the Imperial Point Mobile Home Park in Girard Township and the Hickory Hill Country Village Mobile Home Park in Waterford Township. The map is drawn to scale and identifies the limits of service for each portion of the Requested Territory.

PROVIDED BY: Paul Christopher Luciano

DATE: January 23, 2026

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

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

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

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

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

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

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

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

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

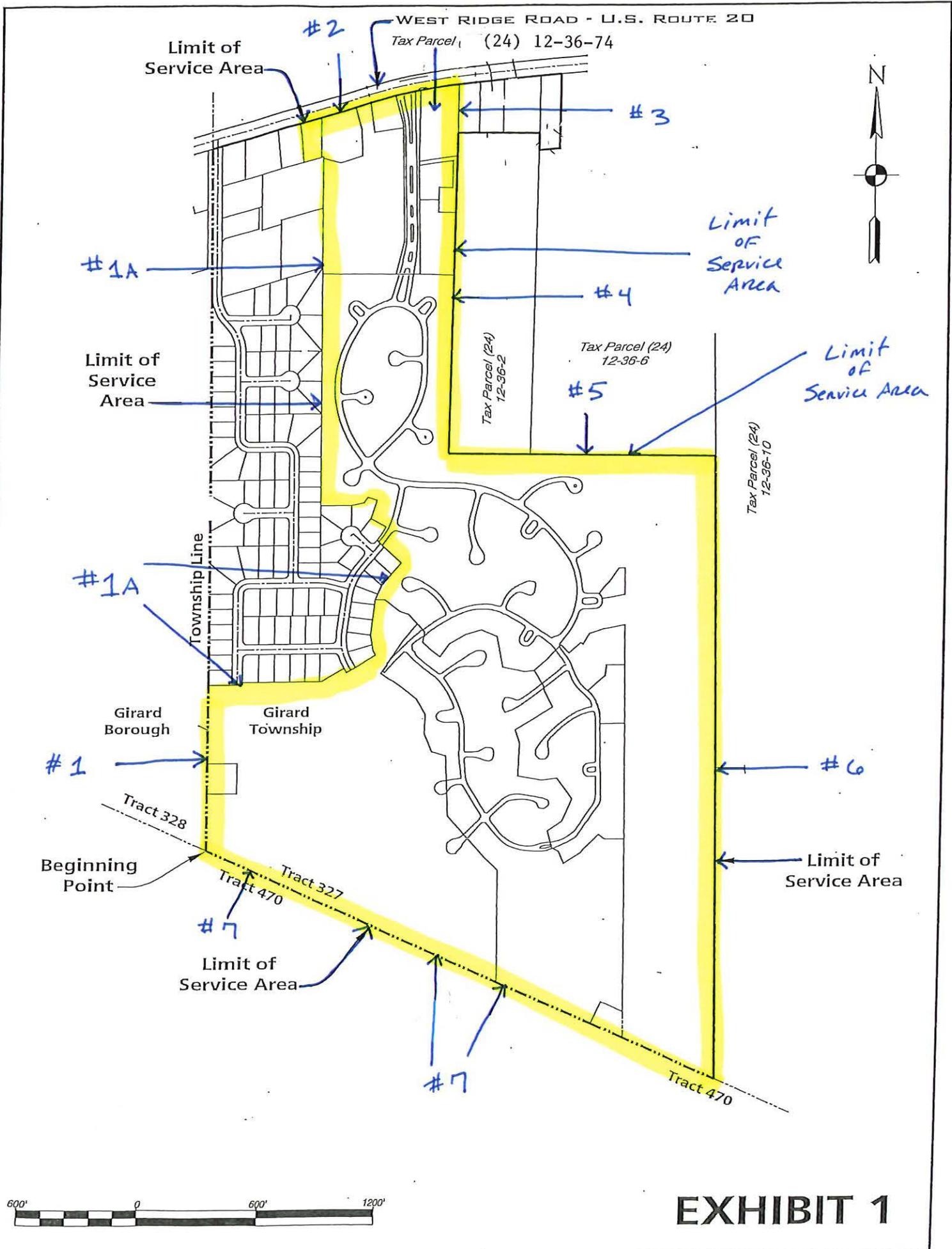
THENCE continuing North 24° 19' West, a distance of 467 feet, more or less, to a point;

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

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

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

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



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

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

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

THENCE North 81° 51' 20" West along the northerly line of lands now or formerly of Craig D. Caldwell et ux, a distance of 342.18 feet to a set ¼ inch iron survey point;

THENCE South 07° 58' 29" West, a distance of 284.86 feet to a set ¼ inch iron survey point;

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

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

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

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

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

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

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

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

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

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

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

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

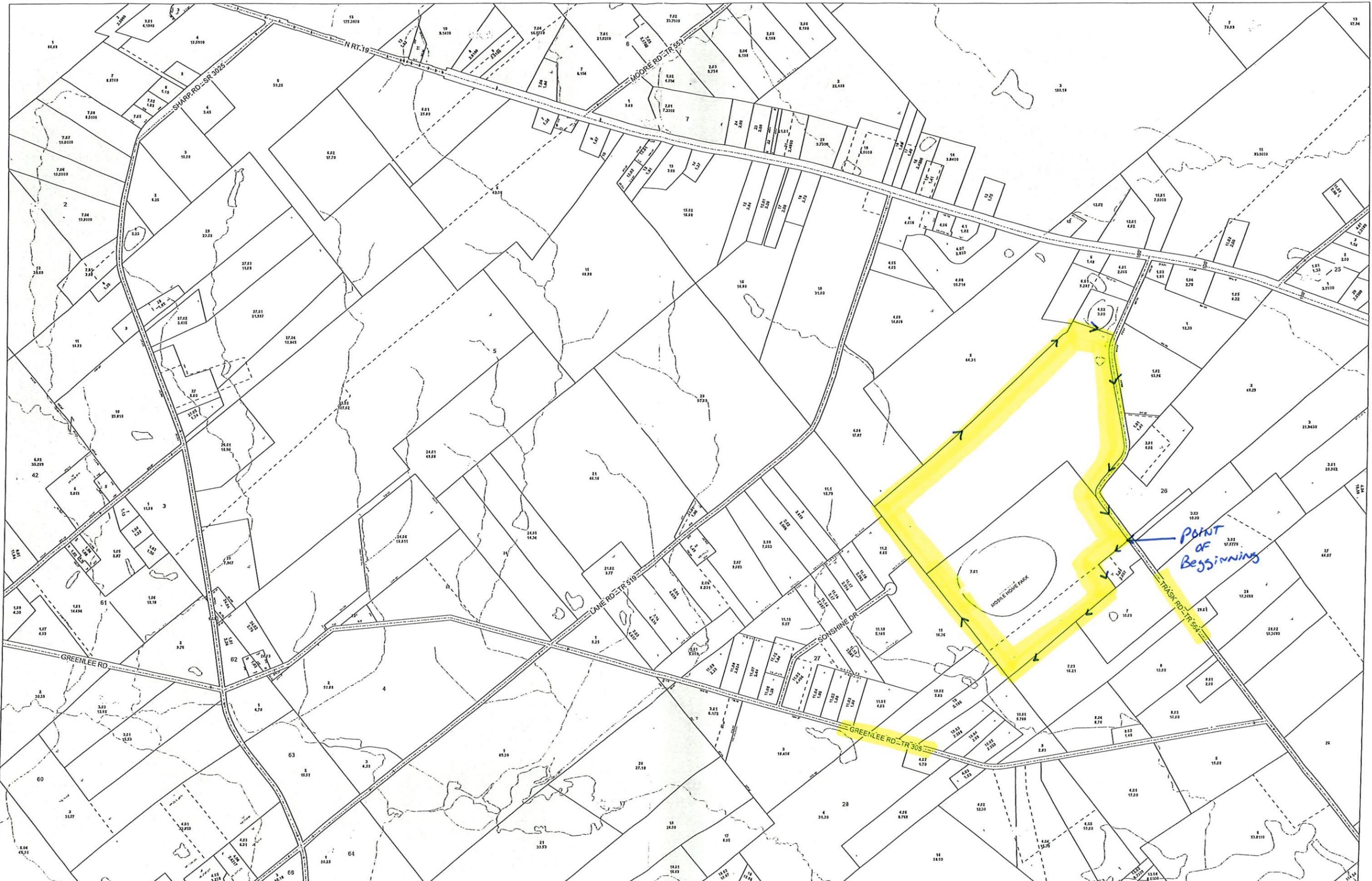
THENCE along a curve to the left along the centerline of Trask Road, with a delta of 34° 56' 07" and a curve radius of 356.00 feet, an arc length of 217.07 feet, and chord bearing South 50° 10' 28" West a chord length of 213.72 feet to a point in the centerline of Trask Road;

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

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

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

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



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

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

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

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

S 85°32'11" E — 630.28'

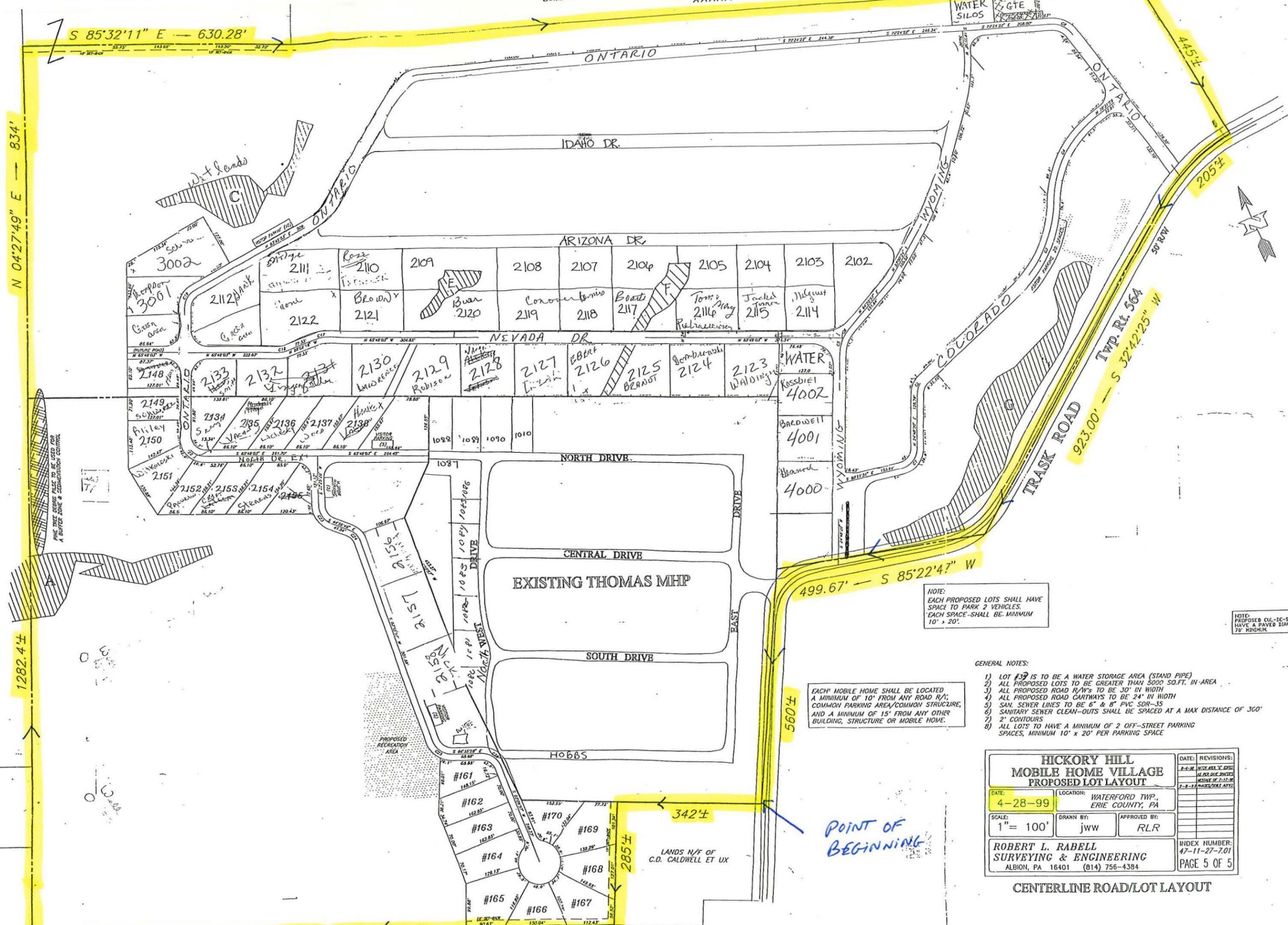
N 04°27'49" E — 834'

1282.4 ±

LANDS OF JOHN KOWALCZYK ET AL

N/F OF AITE ET UX

N/F OF IIE ET UX



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

NOTE:
PROPOSED CUL-DE-SACS SHALL HAVE A PAVED DIAMETER OF 20' MINIMUM.

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

- GENERAL NOTES:
- 1) LOT #139 IS TO BE A WATER STORAGE AREA (STAND PIPE)
 - 2) ALL PROPOSED LOTS TO BE GREATER THAN 5000 SQ.FT. IN AREA
 - 3) ALL PROPOSED ROAD R/W'S TO BE 30' IN WIDTH
 - 4) ALL PROPOSED ROAD CARTWAYS TO BE 24' IN WIDTH
 - 5) SAN. SEWER LINES TO BE 6" & 8" PVC SDR-35
 - 6) SANITARY SEWER CLEAN-OUTS SHALL BE SPACED AT A MAX DISTANCE OF 300'
 - 7) 2' CONTOURS
 - 8) ALL LOTS TO HAVE A MINIMUM OF 2 OFF-STREET PARKING SPACES, MINIMUM 10' x 20' PER PARKING SPACE

POINT OF BEGINNING

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

CENTERLINE ROAD/LOT LAYOUT

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

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

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

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

PROVIDED BY: Stacy Luciano

DATE: October 3, 2024

SUPPLEMENTAL RESPONSE: The Application does not identify a “Waypoint Mobile Home Park.” Rather, Waypoint Property Management, LLC is an affiliated entity that owns and operates the Hickory Hill Country Village Mobile Home Park, as described in the Application. Accordingly, references in the Commission’s question to a “Waypoint Mobile Home Park” or “Waypoint Territory” reflect a misidentification of the ownership structure, not the existence of a separate mobile home park or service territory.

Copies of the metes and bounds legal descriptions by bearing angles and distances for each portion of the Requested Territory are attached.

PROVIDED BY: Paul Christopher Luciano

DATE: January 23, 2026

**METES AND BOUNDS
LEGAL DESCRIPTION FOR
SERVICE AREA
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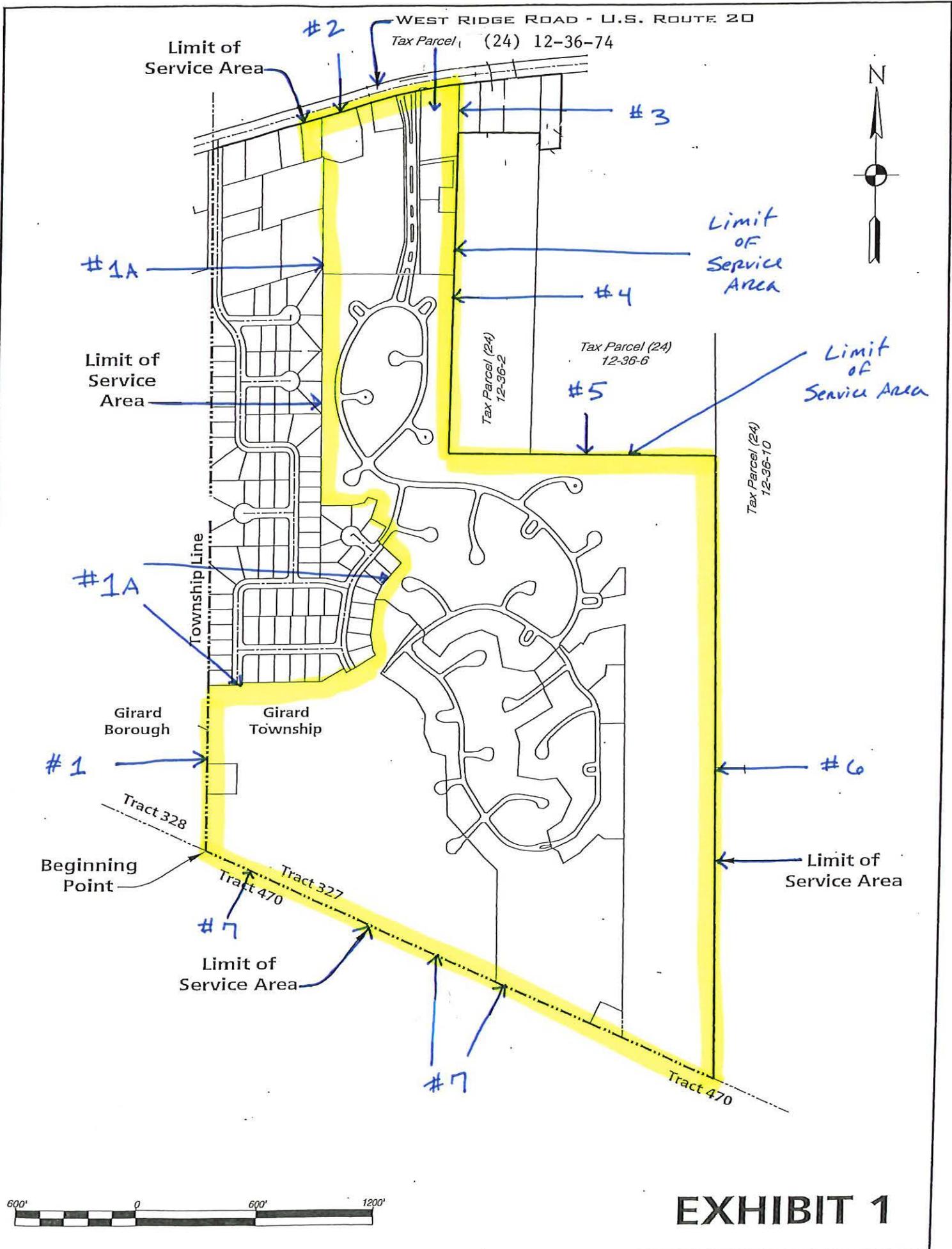
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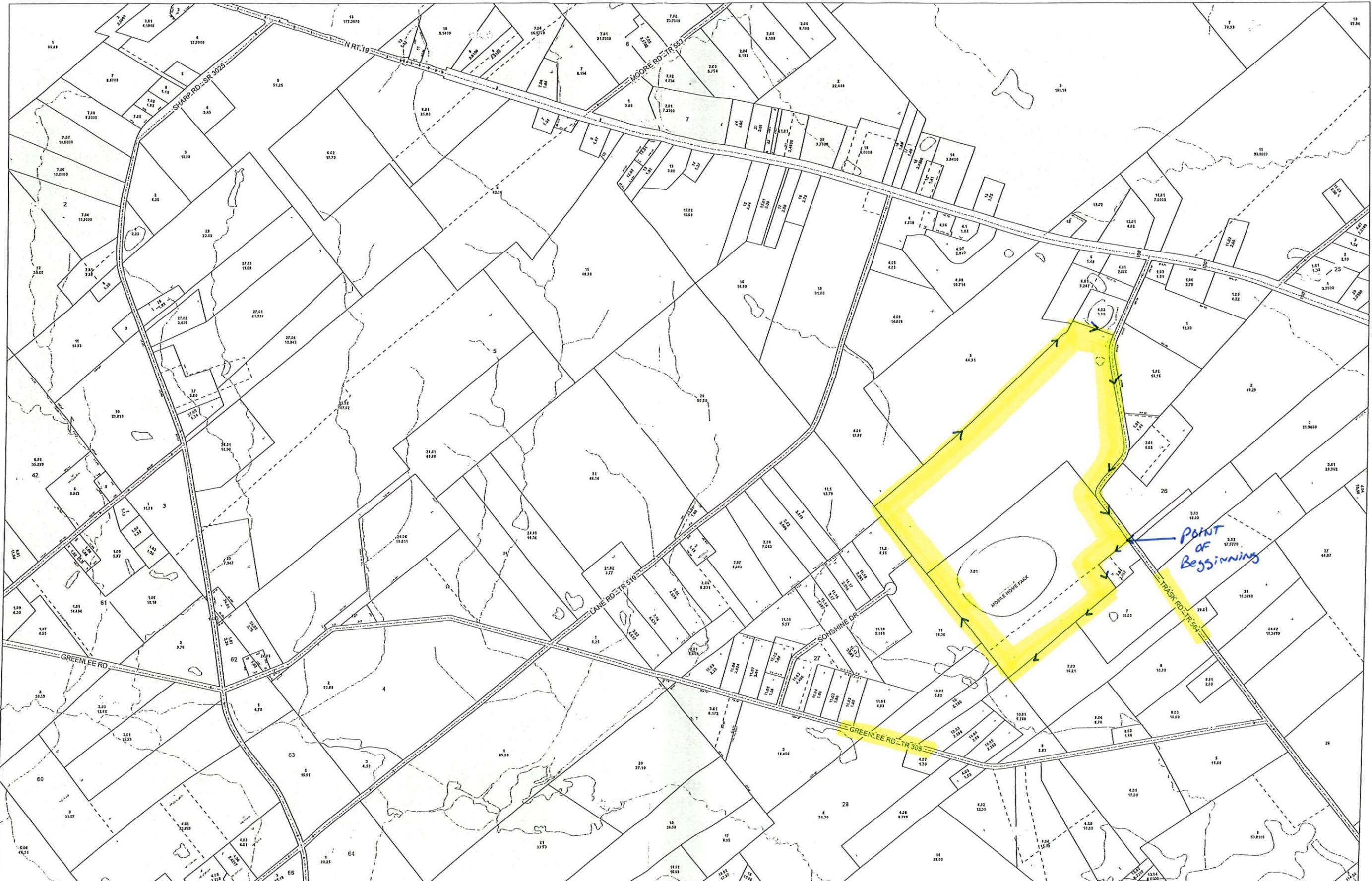
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Bureau of Assessment
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 149 West 6th Street
 Erie, PA 16501
 814-451-6225

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

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

Tax Map Page Index	Tax Parcels	Stream Centerlines	Tracts	Parcel Number & Acreage
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			16	9421 Address Number

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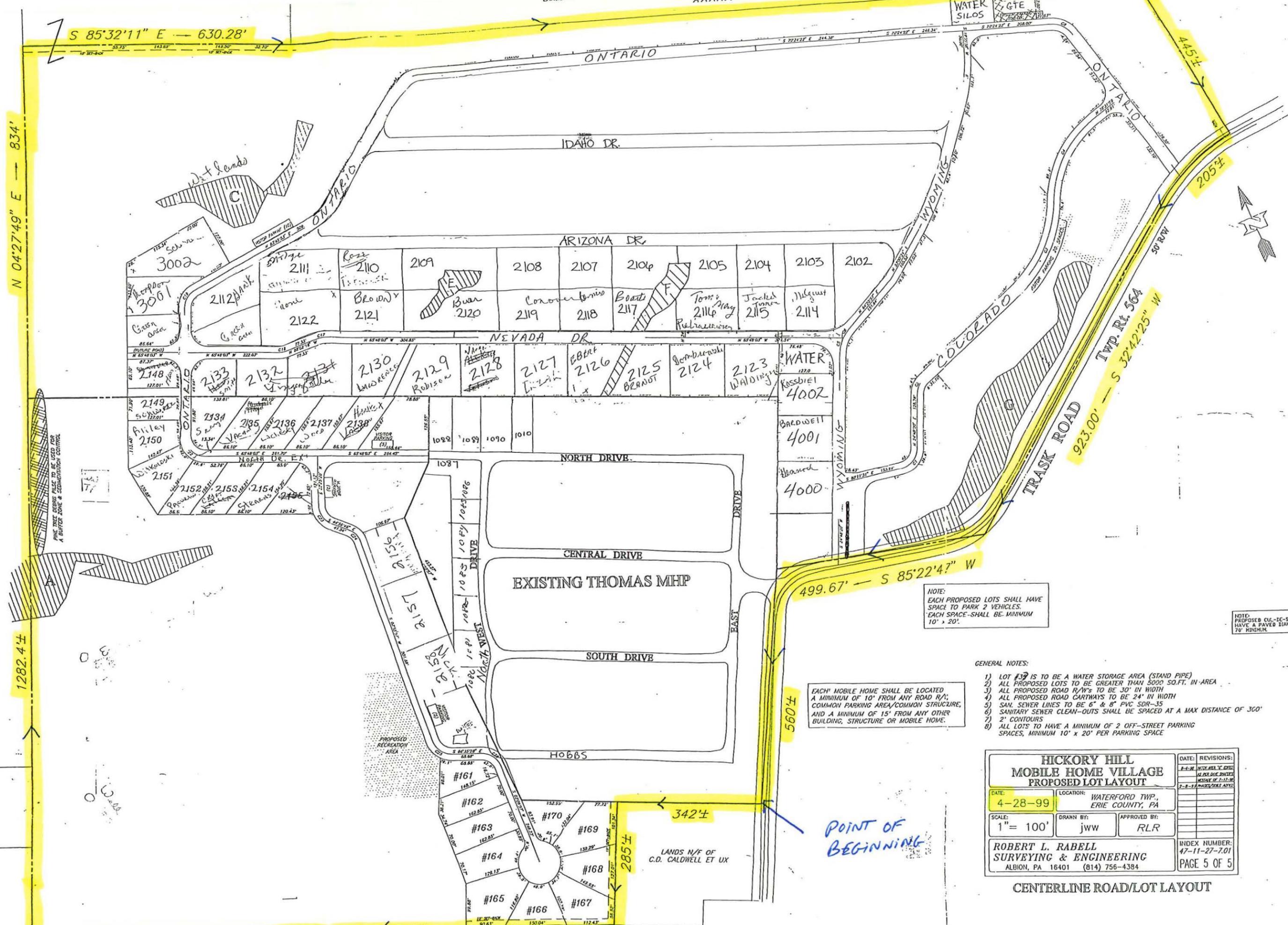
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LANDS OF JOHN KOWALCZYK ET AL

N/F OF AITE ET UX

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EACH SPACE SHALL BE MINIMUM 10' x 20'.

NOTE:
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POINT OF BEGINNING

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

CENTERLINE ROAD/LOT LAYOUT

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Docket No. A-2024-3050786

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

A-4. For each Affiliated MHP and for the Elk Valley Manor Apartment, please specify the
current number of connections (e.g., trailers, apartment units, etc.) served.

RESPONSE: Imperial Point Mobile Home Park has 375 mobile home lots served (including
vacant lots with service available).

Hickory Hill Country Village Mobile Home Park has 155 mobile home lots served (including
vacant lots with service available).

Elk Valley Manor Apartments has 51 apartment units served, plus a management office restroom.
Wastewater service is provided via one service line to the building.

PROVIDED BY: Paul Christopher Luciano

DATE: January 23, 2026

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

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

- A-6. Please explain how operational control of the Waypoint Wastewater System was transferred to Mainlines. This response must include the following:
- a. A chronology identifying each transfer of control of wastewater facilities to any person or corporation, including any estate, and the approximate month and year of each transfer;
 - b. Copies of applicable agreements that transferred control of wastewater facilities between each entity, including any deeds, leases, and other agreements affecting the possession and use of real property where wastewater facilities are located; and
 - c. A statement confirming whether Mainlines owns and operates these wastewater facilities or identifying the current owners and operators.

RESPONSE: The Application does not identify a “Waypoint Mobile Home Park.” Rather, Waypoint Property Management, LLC is an affiliated entity that owns and operates the Hickory Hill Country Village Mobile Home Park, as described in the Application. Accordingly, references in the Commission’s question to a “Waypoint Mobile Home Park” or “Waypoint Territory” reflect a misidentification of the ownership structure, not the existence of a separate mobile home park or service territory.

Please refer to the Answer provided in Mainlines’ Response to Answer A-9, which was provided on December 24, 2025, and is incorporated herein by reference.

PROVIDED BY: Paul Christopher Luciano

DATE: January 23, 2026

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

A-12. Please specify the design peak, design average day, permitted peak, and permitted average day capacities for flow and organic loading for each Mainlines Wastewater System.

RESPONSE: For the Imperial Point Wastewater System, the designed daily average flow is 0.080 MGD and the designed daily average organic loading is 136.0 pounds per day. The corresponding NPDES permit does not establish a permitted peak or permitted average day capacity for flow, and daily flow is subject to a monitor and report requirement only. The corresponding NPDES permit also does not establish a permitted peak or permitted average day capacity for organic loading, as influent parameters are not required to be sampled and only effluent parameters are regulated.

For the Hickory Hill Wastewater System, the designed daily average flow is 0.040 MGD and the designed daily average organic loading is 68.0 pounds per day. The corresponding NPDES permit does not establish a permitted peak or permitted average day capacity for flow, and daily flow is subject to a monitor and report requirement only. The corresponding NPDES permit does not establish a permitted peak or permitted average day capacity for organic loading, as influent parameters are not required to be sampled and only effluent parameters are regulated.

PROVIDED BY: Paul Christopher Luciano

DATE: January 23, 2026

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

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

A-23. Please provide a copy of Mainlines' 2023 balance sheet.

RESPONSE: Copies of Mainlines' 2023 and 2024 balance sheets have been provided below.

PROVIDED BY: Paul Christopher Luciano

DATE: January 23, 2026

Mainlines & Manholes, Inc.

Balance Sheet

As of December 31, 2023

	<u>Dec 31, 23</u>
ASSETS	
Current Assets	
Checking/Savings	
Northwest Savings Bank checking	-497.12
Total Checking/Savings	-497.12
Accounts Receivable	
Accounts Receivable	9,312.80
Total Accounts Receivable	9,312.80
Other Current Assets	
Undeposited Funds	762.00
Total Other Current Assets	762.00
Total Current Assets	9,577.68
Fixed Assets	
Accumulated Depreciation	-31,727.81
Construction Equipment	31,727.81
Total Fixed Assets	0.00
TOTAL ASSETS	<u>9,577.68</u>
LIABILITIES & EQUITY	
Equity	
Capital Stock	1,500.00
Retained Earnings	-3,472.43
Net Income	11,550.11
Total Equity	9,577.68
TOTAL LIABILITIES & EQUITY	<u>9,577.68</u>

1:11 PM

01/19/26

Accrual Basis

Mainlines & Manholes, Inc.

Balance Sheet

As of December 31, 2024

	<u>Dec 31, 24</u>
ASSETS	
Current Assets	
Checking/Savings	
Northwest Savings Bank checking	2,886.68
Total Checking/Savings	2,886.68
Accounts Receivable	
Accounts Receivable	4,495.42
Total Accounts Receivable	4,495.42
Other Current Assets	
Undeposited Funds	2,995.00
Total Other Current Assets	2,995.00
Total Current Assets	10,377.10
Fixed Assets	
Accumulated Depreciation	-31,727.81
Construction Equipment	31,727.81
Total Fixed Assets	0.00
TOTAL ASSETS	<u><u>10,377.10</u></u>
LIABILITIES & EQUITY	
Equity	
Capital Stock	1,500.00
Retained Earnings	11,516.22
Net Income	-2,639.12
Total Equity	10,377.10
TOTAL LIABILITIES & EQUITY	<u><u>10,377.10</u></u>

Federal Statements**Statement 1 - Form 1120-S, Page 1, Line 20 - Other Deductions**

<u>Description</u>	<u>Amount</u>
INSURANCE	\$ 336
LEGAL AND PROFESSIONAL	22,081
LICENSES	1,565
OFFICE EXPENSE	1,010
UTILITIES	16,499
MANAGEMENT FEES	71,811
AUTO & TRUCK	2,089
COMPUTER & INTERNET EXP	3,179
MISCELLANEOUS EXPENSE	372
50% OF MEALS	911
TOTAL	\$ <u>119,853</u>

Statement 2 - Form 1120-S, Page 3, Schedule K, Line 12a - Cash Contributions

<u>Description</u>	<u>Cash Contrib 60%</u>	<u>Cash Contrib 30%</u>	<u>Total</u>
	\$ 150	\$	\$ 150
TOTAL	\$ <u>150</u>	\$ <u>0</u>	\$ <u>150</u>

Statement 3 - Form 1120-S, Page 4, Schedule K, Line 17d - Other Items and Amounts

<u>Description</u>	<u>Amount</u>
SECTION 199A INFORMATION - SEE ATTACHED WRK QUALIFIES FOR EXCEPTION TO FILING SCHEDULE K-2	\$

Statement 4 - Form 1120-S, Page 4, Schedule L, Line 6 - Other Current Assets

<u>Description</u>	<u>Beginning of Year</u>	<u>End of Year</u>
A/R SPRINGHOUSE	\$ 6,683	\$ 6,683
TOTAL	\$ <u>6,683</u>	\$ <u>6,683</u>

Statement 5 - Form 1120-S, Page 5, Schedule M-2, Line 5(a) - Other Reductions

<u>Description</u>	<u>Amount</u>
TRAVEL & ENTERTAINMENT	\$ 911
CHARITABLE CONTRIBUTIONS	150
TOTAL	\$ <u>1,061</u>

Federal Statements

Statement 6 - Form 1125-A, Line 5 - Other Costs

<u>Description</u>	<u>Amount</u>
CONTRACT SERVICES	\$ 10,263
WASTE DISPOSAL	3,417
WATER TESTING	1,576
CHEMICALS	15,479
FUEL	5,513
OPERATOR EXPENSE	4,163
TOTAL	<u>\$ 40,411</u>

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

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

A-25. Please provide an estimate of Mainlines anticipated annual revenue and expenses under present rates.

RESPONSE: Please see Mainlines' Response to A-23. Mainlines does not anticipate any material changes.

PROVIDED BY: Paul Christopher Luciano

DATE: January 23, 2026

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

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

A-30. The 1981 Agreement included an incomplete copy of Page 8. Please provide a copy of the
1981 Agreement's Page 8.

RESPONSE: A copy of the 1981 Agreement's Page 8 is included below.

PROVIDED BY: Paul Christopher Luciano

DATE: January 23, 2026

n. "LUCIANO" or their successors shall indemnify and hold the "TOWNSHIP" harmless for or on account of any injury to any person or property, including death of any person, that may occur on/or about the premises of the sewage treatment plant. That is, "LUCIANO" or their successors agree to indemnify and save harmless "TOWNSHIP" from and against any and all claims, suits, damages and/or causes of action arising during the term of this Agreement, for personal injury, loss of life, and/or damage to property sustained as a result of the operation of said sanitary sewer plant, and from and against all costs, counsel fees, expenses and liabilities incurred in and about such claim or investigation thereof, or the defense of any action or proceeding brought thereon, and from and against any orders, judgments or decrees that may be entered against "LUCIANO" or their successors and/or "TOWNSHIP".

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

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

A-31. The 1981 Agreement referenced attached Exhibits A through D. However, these exhibits were not attached to the Application. Please provide copies of the 1981 Agreement's Exhibits A through D.

RESPONSE: Mainlines has searched its records for the exhibits referenced in the 1981 Agreement as Exhibits A through D and has been unable to locate copies of those exhibits. Mainlines has also confirmed with Girard Township that the Township likewise does not have copies of Exhibits A through D in its records. To the extent the exhibits once existed, they are no longer available.

Mainlines has produced the complete 1981 Agreement and all related documentation currently in its possession, custody, or control.

PROVIDED BY: Paul Christopher Luciano

DATE: January 23, 2026

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

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

A-34. Please explain how Mainlines proposed flat rate of \$3,000 per month for wastewater service to the Waypoint MHP was determined (e.g., cost of service study, the proposed flat rate results in similar revenues compared with proposed EDU-based rates charged to non-affiliated interest customers, etc.).

RESPONSE: The proposed flat rate of \$3,000 per month for wastewater service to the Hickory Hill Country Village Mobile Home Park was determined based on the number of mobile home lots served and the manner in which wastewater charges are incorporated into lot rent rather than separately billed on an EDU or metered basis. The flat rate establishes a reasonable and predictable charge for wastewater service that reflects the size of the mobile home park and provides a billing structure where wastewater service is included in rent.

The proposed flat rate is intended to eliminate any prior informal or non-compensatory service arrangements and to ensure that wastewater service is billed in a consistent and compliant manner.

PROVIDED BY: Paul Christopher Luciano

DATE: January 23, 2026.

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

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

A-36. In the Application's Exhibit B, Form 1120-S Two Year Comparison Worksheet Page 1 for 2021 and 2022, the tax form identified \$18,000 in net receipts for 2021, compared with \$166,452 in net receipts for 2023 in Form 1120-S for the 2023 tax year. These forms also reflect that cost of goods sold increased from \$6,000 for 2021 to \$89,504 for 2023 and total deductions increased from \$601 for 2021 to \$68,119 for 2023. Please explain the reasons for these significant increases in net receipts, cost of goods sold, and total deductions, respectively.

RESPONSE: The increases reflected in the 2021 through 2023 tax filings result from Mainlines assuming control of wastewater operations in 2021. Prior to that time, wastewater revenues and expenses were managed and retained by the prior operator and were not recorded on Mainlines' books. Once Mainlines assumed operations, it began recording wastewater revenues and expenses directly, resulting in higher reported net receipts, cost of goods sold, and deductions.

PROVIDED BY: Paul Christopher Luciano

DATE: January 23, 2026.

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

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

A-37. Please provide a copy a recent monthly or quarterly bill for wastewater service provided to the Imperial Point MHP, the Elk Valley Manor apartment building, and any other Mainlines wastewater customer that is not an affiliated interest of Mainlines.

RESPONSE: Copies of recent monthly and quarterly bills have been provided below.

PROVIDED BY: Paul Christopher Luciano

DATE: January 23, 2026

MAINLINES & MANHOLES and WASTEWATER TREATMENT, INC.
P.O. BOX 927
FAIRVIEW, PA 16415

OFFICE PHONE 814 -774-2184

EMERG. PHONE 814-434-4115

FAX 814 -774-3939

Customer Information



November 3, 2025

Re: Sewer Service –4th Quarter 2025
Sewer Service ending December 31, 2025
Invoice # 202504

3 EDUs* @ \$ 119.00 per EDU \$357.00

Total Due -----
\$ 357.00

Thank you,

MAINLINES & MANHOLES and WASTEWATER TREATMENT, INC.

Terms: Net 15 Days
Due December 15, 2025

***EDU's are based on the Total Daily Operating Costs to treat your specific generated waste in the Sewer System.**

MAINLINES & MANHOLES and WASTEWATER TREATMENT, INC.
P.O. BOX 927
FAIRVIEW, PA 16415

OFFICE PHONE 814 -774-2184

EMERG. PHONE 814-434-4115

FAX 814 -774-3939

Customer Information



November 3, 2025

Re: Sewer Service – 4th Quarter 2025
Sewer Service ending December 31, 2025
Invoice # 202504

6 EDUs @ \$ 119.00 per EDU \$ 714.00

Late Charges 0.00

Total Due \$ 714.00

Thank you,

MAINLINES & MANHOLES and WASTEWATER TREATMENT, INC.

Term: Net 15 Days
Due December 15, 2025

*EDU's are based on the Total Daily Operating Costs to treat your specific generated waste in the Sewer System.

MAINLINES & MANHOLES and WASTEWATER TREATMENT, INC.
P.O. BOX 927
FAIRVIEW, PA 16415

OFFICE PHONE 814 -774-2184

EMERG. PHONE 814-434-4115

FAX 814 -774-3939

Customer Information



November 3, 2025

Re: Sewer Service – 4th Quarter 2025: 9149 W. Ridge Rd, Girard, PA 16417
Sewer Service ending December 31, 2025
Invoice # 202504

2 EDUs @ \$ 119.00 per EDU \$ 238.00

Total Due -----
\$ 238.00

Thank you,

MAINLINES & MANHOLES and WASTEWATER TREATMENT, INC.

Terms: Net 15 Days
Due December 15, 2025

***EDU's are based on the Total Daily Operating Costs to treat your specific generated waste in the Sewer System.**

MAINLINES & MANHOLES and WASTEWATER TREATMENT, INC.
P.O. BOX 927
FAIRVIEW, PA 16415

OFFICE PHONE 814 -774-2184

EMERG. PHONE 814-434-4115

FAX 814 -774-3939

Customer Information



November 3, 2025

Re: Sewer Service –4th Quarter 2025
Sewer Service ending December 31, 2025
Invoice # 202504

5 EDUs @ \$ 119.00 per EDU \$ 595.00

Late Fee -----\$10.71

Total Due \$ 605.71

Thank you,

MAINLINES & MANHOLES and WASTEWATER TREATMENT, INC.

Terms: Net 15 Days
Due December 15, 2025

***EDU's are based on the Total Daily Operating Costs to treat your specific generated waste in the Sewer System.**

MAINLINES & MANHOLES and WASTEWATER TREATMENT, INC.
P.O. BOX 927
FAIRVIEW, PA 16415

OFFICE PHONE 814 -774-2184

EMERG. PHONE 814-434-4115

FAX 814 -774-3939

Customer Information



November 3, 2025

Re: Sewer Service – 4th Quarter 2025: 9133 W. Ridge Rd., Girard, PA 16417
Sewer Service ending December 31, 2025
Invoice # 202504

2 EDUs @ \$ 119.00 per EDU \$ 238.00

Late Charges \$0.00

Total Due \$ 238.00

Thank you,

MAINLINES & MANHOLES and WASTEWATER TREATMENT, INC.

Terms: Net 15 Days
Due December 15, 2025

***EDU's are based on the Total Daily Operating Costs to treat your specific generated waste in the Sewer System.**

MAINLINES & MANHOLES and WASTEWATER TREATMENT, INC.
P.O. BOX 927
FAIRVIEW, PA 16415

OFFICE PHONE 814-774-2184

EMERG. PHONE 814-434-4115

FAX 814-774-3939

Customer Information



November 3, 2025

Re: Sewer Service – 4th Quarter 2025
Sewer Service ending December 31, 2025
Invoice # 202504

3 EDUs @ \$ 119.00 per EDU \$ 357.00

Total Due -----
\$ 357.00

Thank you,

MAINLINES & MANHOLES and WASTEWATER TREATMENT, INC.

Terms: Net 15 Days
Due December 15, 2025

***EDU's are based on the Total Daily Operating Costs to treat your specific generated waste in the Sewer System.**

MAINLINES & MANHOLES and WASTEWATER TREATMENT, INC.
P.O. BOX 927
FAIRVIEW, PA 16415

OFFICE PHONE 814-774-2184

EMERG. PHONE 814-434-4115

FAX 814-774-3939

Customer Information



November 3, 2025

Re: Sewer Service –4th Quarter 2025
Sewer Service ending December 31, 2025
Invoice # 202504

6 EDUs @ \$ 119.00 per EDU \$ 714.00

Late Charges 0.00

Total Due \$ 714.00

Thank you,

MAINLINES & MANHOLES and WASTEWATER TREATMENT, INC.

Terms: Net 15 Days
Due December 15, 2025

***EDU's are based on the Total Daily Operating Costs to treat your specific generated waste in the Sewer System.**

MAINLINES & MANHOLES and WASTEWATER TREATMENT, INC.
P.O. BOX 927
FAIRVIEW, PA 16415

OFFICE PHONE 814-774-2184

EMERG. PHONE 814-434-4115

FAX 814-774-3939

Customer Information



November 3, 2025

Re: Sewer Service – 4th Quarter 2025
Sewer Service ending December 31, 2025
Invoice # 202504

14 EDUs @ \$ 119.00 per EDU \$ 1,666.00

Total Due	\$ 1,666.00
------------------	--------------------

Thank you,

MAINLINES & MANHOLES and WASTEWATER TREATMENT, INC.

Terms: Net 15 Days
Due December 15, 2025

***EDU's are based on the Total Daily Operating Costs to treat your specific generated waste in the Sewer System.**

MAINLINES & MANHOLES and WASTEWATER TREATMENT, INC.
P.O. BOX 927
FAIRVIEW, PA 16415

OFFICE PHONE 814-774-2184

EMERG. PHONE 814-434-4115

FAX 814-774-3939

Customer Information



January 2, 2026

INVOICE

INVOICE

RE: Sewer Service for the month of February 2026 \$ 2,023.00
Invoice #202602

Total \$2,023.00

Sewer charge is based on 51 EDUs @ \$ 119.00 per EDU per quarter, or \$6,069.00 per quarter. To be billed monthly.

Thank you,

MAINLINES & MANHOLES and WASTEWATER TREATMENT, INC.

Terms- Net Due by the 10th of the month
Due- February 10th, 2026

***EDU's are based on the Total Daily Operating Costs to treat your specific generated waste in the Sewer System.**

MAINLINES & MANHOLES and WASTEWATER TREATMENT, INC.
P.O. BOX 927
FAIRVIEW, PA 16415

OFFICE PHONE 814-774-2184

EMERG. PHONE 814-434-4115

FAX 814-774-3939

Customer Information



January 2, 2026

INVOICE

INVOICE

RE: Sewer Service for the month of February 2026 \$ 1,586.67
Invoice #202602

Total \$ 1,586.67

Sewer charge based on 40 EDUs @ \$ 119.00 per EDU per quarter or \$4,760.00 per quarter. To be billed monthly.

Thank you,

MAINLINES & MANHOLES and WASTEWATER TREATMENT, INC.

Terms: Net Due by the 10th of the month
Due: February 10th, 2026

MAINLINES & MANHOLES and WASTEWATER TREATMENT, INC.
P.O. BOX 927
FAIRVIEW, PA 16415

OFFICE PHONE 814-774-2184

EMERG. PHONE 814-434-4115

FAX 814-774-3939

Customer Information



January 2, 2026

INVOICE

INVOICE

RE: Sewer Service for the month of **February 2026**
Invoice #202602

\$1,031.33

Total \$1,031.33

Sewer charge is based on 26 EDUs @ \$ 119.00 per EDU per quarter, or \$3,094.00 per quarter. To be billed monthly.

Thank You,

MAINLINES & MANHOLES and WASTEWATER TREATMENT, INC.

Terms: Net Due by 10th of month

Due: February 10th, 2026

*EDU's are based on the Total Daily Operating Costs to treat your specific generated waste in the Sewer System.

MAINLINES & MANHOLES and WASTEWATER TREATMENT, INC.
P.O. BOX 927
FAIRVIEW, PA 16415

OFFICE PHONE 814-774-2184

EMERG. PHONE 814-434-4115

FAX 814-774-3939

Customer Information



January 2, 2026

INVOICE

INVOICE

RE: Sewer Service for the month of **February 2026**
Invoice #202602

\$1,031.33

Total \$1,031.33

Sewer charge is based on 26 EDUs @ \$ 119.00 per EDU per quarter, or \$3,094.00 per quarter. To be billed monthly.

Thank You,

MAINLINES & MANHOLES and WASTEWATER TREATMENT, INC.

Terms: Net Due by 10th of month

Due: February 10th, 2026

*EDU's are based on the Total Daily Operating Costs to treat your specific generated waste in the Sewer System.

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Next page

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Mainlines & Manholes, Inc.

9208 Tannery Road
Girard, PA 16417
PHONE: (814) 434-4104
FAX: (814) 774-9218

Invoice

Date	Invoice #
12/1/2025	424

Bill To
Imperial Point

P.O. No.	Terms	Project

Quantity	Description	Rate	Amount
	Monthly Sewer	7,000.00	7,000.00
Total			\$7,000.00

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

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

A-43. Please provide copies of letters issued by applicable county and municipality officials certifying that Mainlines does or does not meet all applicable requirements of officially adopted county comprehensive plans, municipal comprehensive plans, and applicable zoning designations, including any necessary amendments.

RESPONSE: A copy of a letter provided by Girard Township is included below. Mainlines will supplement this response when additional letters are received from other applicable county or municipal officials.

PROVIDED BY: Paul Christopher Luciano

DATE: January 23, 2026



GIRARD TOWNSHIP

10140 Ridge Road (814)774-4738, Ext 101
Girard, PA 16417 (814)774-0637 Fax
E-Mail: tiffany@girardtownship.com
www.girardtownship.com

lindy L. Platz, Chairman
Pete Dion Vice-Chairman *Clayton G. Brocius, Supervisor*

January 21, 2026

To whom it may concern:

This letter is to confirm that the mainlines at Imperial Point have been designed and constructed in accordance with all applicable regulations and standards. Specifically, the project complies with the requirements established by both Erie County and Girard Township's comprehensive plans, as well as all current zoning designations and development regulations in effect for the area. To the best of my knowledge, this project is in full compliance with Girard Township and Erie County standards.

Should you have any questions or additional information, please feel free to contact me at (814) 774-4738 x101 or via email at tiffany@girardtownship.com.

Respectfully,

Tiffany Kramer
Zoning Administrator
Girard Township
10140 Ridge Rd.
Girard, PA 16417

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

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

A-44. Please provide copies of the DEP-approved Act 537 Official Sewage Facilities Plan (Act 537 Plan) for each municipality included in the Requested Territory, including any Act 537 Plan revisions (i.e., planning modules, special studies, etc.), and any related DEP approval or exemption letters for each Mainlines Wastewater System pursuant to Section 5 of the Pennsylvania Sewage Facilities Act, 35 P.S. § 750.5. This includes copies of Act 537 Plans, revisions, approvals, and exemptions in all areas included in the Requested Territory.

RESPONSE: Mainlines has conducted a reasonable search for DEP-approved Act 537 Official Sewage Facilities Plans, including any amendments, planning modules, special studies, approvals, or exemption letters applicable to the Requested Territory.

As to Girard Township, Mainlines has attached a copy of the Township of Girard Act 537 Official Sewage Facilities Plan Update Amendment dated December 2015.

As to Waterford Township, Mainlines has made multiple attempts to obtain Act 537 planning documents, including telephone calls and email inquiries to Waterford Township and related offices. To date, those inquiries have not been returned and Mainlines has not been provided with any Act 537 plans, amendments, planning modules, approvals, or exemption letters specific to Waterford Township or the wastewater system serving Hickory Hill Country Village Mobile Home Park.

Mainlines has produced all Act 537-related materials currently in its possession.

PROVIDED BY: Paul Christopher Luciano

DATE: January 23, 2026

TOWNSHIP OF GIRARD

ACT 537
OFFICIAL SEWAGE FACILITIES
PLAN UPDATE

AMENDMENT
DECEMBER 2015

**TOWNSHIP OF GIRARD
ERIE COUNTY, PENNSYLVANIA**

TABLE OF CONTENTS

Introduction.....	3
Section I Previous Wastewater Planning.....	4
Section II Physical and Demographic Analysis	6
Section III Existing Sewage Facilities in Planning Area.....	7
Section IV Future Growth and Land Development.....	8
Section V Identify Alternatives to Provide New or Improved Wastewater Disposal Facilities.....	9
Section VI Evaluation of Alternatives.....	10
Section VII Institutional Evaluation.....	14
Section VIII Implementation Schedule.....	15

Appendices

Appendix A.....	Intermunicipal Agreement w/Lake City Sewer Service Agreement w/Uncle John's Campground Sewer Service Agreement w/Country Gardens Mobile Home Park
Appendix B.....	Erie County Health Department Reports Study Area No. 4 On-Lot Review
Appendix C.....	Township Land Development Ordinances
Appendix D.....	Holding Tank Ordinance
Appendix E.....	Public Meeting Comments and Summary

INTRODUCTION

This is an amendment to the February 2012 Act 537 Official Sewage Facilities Plan Update submitted to the Pennsylvania Department of Environmental Protection (PADEP) by the Township of Girard (Township). The objective of this amendment is to present the changes to each of the aforementioned Update's eight sections based on the actions and negotiations of the Township with the Borough of Lake City and its Municipal Authority, the negotiations with the owners of Country Gardens Mobile Home Park and the owners of Uncle John's Campground, the closing of the legal actions by the Township for the ownership of the Lake Erie Community Park and the remedial actions taken to correct the identified malfunctioning on-lot systems in Study Area No. 4.

The results of these actions and negotiations by the Township have been:

1. The development and execution of an intermunicipal agreement with the Borough of Lake City and its Municipal Authority (as jointly noted herein as the Lake City Borough) to provide sewage treatment services to Uncle John's Campground, Country Gardens and for the potential future development of the Lake Erie Community Park.
2. The development and adoption of a new holding tank ordinance by the Township.
3. The development and execution of Sewer Service Agreements between the Township and the owners of Country Gardens Mobile Home Park and the owners of Uncle John's Campground to provide for their connection to the Lake City sewerage system.
4. The correction of all identified malfunctioning on-lot systems in Study Area No. 4.
5. The Township's agreement with the PADEP to review the sewerage needs of the four Act 537 study areas in five years from the adoption of this amendment by the Township and its approval by the PADEP and to update the Act 537, as necessary, every 10 years.
6. The inclusion of an on-lot sewage system education program in the Townships website.

It must be understood by any reader of this amendment the intent of the Township is to control development in accordance with its zoning ordinance, as such, the Township should remain an agricultural township, not one of promoting land development.

SECTION I PREVIOUS WASTEWATER PLANNING

BACKGROUND:

From 2012 through mid-2014, the Township continued to work with the owners of Country Gardens Mobile Home Park and Uncle John's Campground towards the development of a sewage management system that would meet with the approval of the PADEP, the Township also continued the legal action to obtain full possession of the Lake Erie Community Park, worked with the Erie County Health Department to facilitate the correction of all identified malfunctioning on-lot sewage systems in Study Area No. 4 and continued its discussions with Lake City Borough in the hopes of entering into an intermunicipal agreement for sewage treatment service.

During this period the owner of Country Gardens Mobile Home Park evaluated many options for providing a new sewage treatment system retaining the hope of possibly connecting to Lake City's sewerage system. The owner of Uncle John's Campground had agreed to connect to the Lake City sewerage system when such a connection would become available. The Township concluded the legal actions for the Lake Erie Community Park obtaining full legal possession and developed a preliminary plan for the recreational use of the park.

The most beneficial event occurred in mid-2014 when the Lake City borough council notified the Township they would be interested in developing an intermunicipal agreement for providing sewage treatment services to the residents of the Township. From this notification, the Township engaged its solicitor and engineer to work with the Borough to develop an intermunicipal agreement. The Township also notified the owners of Country Gardens Mobile Home Park and Uncle John's Campground that the option of connecting to Lake City's sewerage system was now an available.

Through many communications with the owners of Country Gardens Mobile Home Park and Uncle John's Campground the Township executed a Sewer Service Agreement with both entities by which they agreed to connect to the Lake City sewage system, at their own cost, to accept financial liability for the debt service payment for the maximum monthly sewage flow volume they would require treatment for and agreed that they would operate and maintain their respective sewage systems.

The intermunicipal agreement negotiated by the Township and Lake City Borough designates the Township as the single customer of the Borough, as such, Country Gardens Mobile Home Park and Uncle John's Campground will be a "sewage customer" of the Township being billed directly by the Township based on the quarterly (monthly if so enacted by the Township) sewage volume transported to the Lake City system.

A. Identify, Describe and Briefly Analyze All Past Wastewater Planning for Its Impact On the Current Planning Effort

- 1. Previous Act 537 Plans:** The 2012 Update was adopted by the Township but not approved by the PADEP primarily because the owner of Country Gardens Mobile Home Park did not submit a viable sewage treatment system. Furthermore, the PADEP had begun discussions with Lake City Borough Council to evaluate its sewage treatment system, from which the Borough determined the need to upgrade the majority of the treatment systems mechanical units.
- 2. Actions Not Carried Out:** The Township implemented the actions as stated in the 2012 Update as best as it could without the approval of the 2012 Update by the PADEP.
- 3. Corrective Action Plans:** The Township continues to comply with the 2006 Consent Order and Agreement. It is hoped that by submitting this amendment the Consent Order and Agreement can be closed.
- 4. Planning Modules:** No additional planning modules have been submitted to the Township for development within any of the Act 537 Plans study area. The primary change has been Mercyhurst College's decision to not continue with the planned development of a western campus. From the adoption of this amendment, the Township expects to receive planning modules from the owner of Uncle John's Campground for the connection of a sewage system designed for 2,000 GPD to Lake City's and to receive planning modules from the owner of Country Gardens Mobile Home Park for the a sewage system designed for 29,400 GPD to Lake City's. The Township has included a flow of 3,600 GPD for the Lake Erie Community Park in the intermunicipal agreement with Lake City Borough as a future flow volume, the Township does not anticipate the need for sewage service from Lake City Borough for the foreseeable future. The aforementioned flows totaling 35,000 GPD are considered a maximum monthly flow volumes.

The basis for the planning modules is the intermunicipal agreement between the Township and Lake City Borough and its Municipal Authority and the Sewer Service Agreements between the Township and the owners of Country Gardens Mobile Home Park and Uncle John's Campground (said agreements are included in Appendix A of this amendment).

SECTION II

PHYSICAL AND DEMOGRAPHIC ANALYSIS

A-G: No changes are required for this sections.

H. Potable Water Supplies: The Westgate area is provided potable water from the Imperial Point Water Service Company Inc. Public water is supplied by Girard Borough to the commercial business Van Air and Lake City Borough provides public water to AirBourne, Uncle John's Campground, the Elk Creek Sportsman Club and the Lake Erie Community Park.

SECTION III

EXISTING SEWAGE FACILITIES IN PLANNING AREAS

A. Identify, Map and Describe Municipal and Non-Municipal Systems

Study Area No. 1: No change.

Study Area No. 2:

- 1. Public Sewerage Systems:** The Township and Lake City Borough have entered into an intermunicipal agreement through which Lake City Borough will provide for the treatment of a maximum monthly flow volume of 35,000 GPD. This flow will be allocated by the Township with 29,400 GPD for Country Gardens Mobile Home Park, 2,000 GPD for Uncle John's Campground and 3,600 GPD for the Lake Erie Community Park.
- 2. Non-Public Sewerage Systems:** The Township has reserved 3,600 GPD for the Lake Erie Community Park. Currently the park is served by three on-lot sewage systems, all of which have been inspected by the Erie County Health Department and found to be functioning properly. The three on-lot systems are as follows: Permit No. R48901 for 1,000 gallons per week for a RV dump station; Permit No. R60579 for 2,000 GPD for the pavilion area and Permit No. R52588 for 1,500 GPD for the restroom shower house.

Study Area No. 3: No change.

Study Area No. 4: No change.

B. Identify, Map and Describe Areas Using On-Lot or Community Systems

Study Area Nos. 1, 2 and 3: No change.

Study Area No. 4: The on-lot systems identified as malfunctioning have been examined by the Erie County Health Department, corrections have been made where necessary and all are functioning. Copies of the Erie County Health Department's reports are contained in Appendix B of this amendment.

C. Identify Wastewater Sludge and Septage Generation, Transport and Disposal

No change.

SECTION IV

FUTURE GROWTH AND LAND DEVELOPMENT

The Township will continue with the zoning plan developed in 2005.

The only anticipated growth is with Country Gardens Mobile Home Park for which the owner has stated the intent to develop an additional 18 lots increasing the total development from 72 lots to 90 lots for mobile home units. The additional 18 lots are included in the maximum monthly flow value of 29,400 GPD previously stated as being included in the intermunicipal agreement between the Township and Lake City Borough.

It must be understood that the owner of Country Gardens Mobile Home Park cannot proceed with the development of the additional 18 lots until such time as the owner submits plans and documents required by the Township's land development ordinances (copies of which are included in Appendix C of this amendment). The conceptual plan submitted for the 18 lots in 2009 must be updated to reflect the proposed connection point at the Lake City Borough system and only show lateral connections for 18 lots.

SECTION V

IDENTIFY ALTERNATIVES TO PROVIDE NEW OR IMPROVED WASTEWATER DISPOSAL FACILITIES

A. Conventional Collection, Conveyance, Treatment and Discharge Alternatives

With the development and execution of the intermunicipal agreement with Lake City Borough, Country Gardens Mobile Home Park and Uncle John's Campground can now proceed with the permitting, design and construction of their respective sewerage systems to transport said sewage to the Lake City Borough sewerage system. The sewerage systems for Country Gardens Mobile Home Park and Uncle John's Campground will be constructed, owned and operated by their respective owners, it is not intended that these systems be dedicated to the Township for ownership, operations or maintenance.

The intermunicipal agreement also provides for the future connection of the Lake Erie Community Park to the Lake City Borough sewerage system. Should public sewerage service be provided for the park, the system will be constructed, owned, operated and maintained by the Township.

B-F. Continued Use of On-lot, Small Flows, Holding Tanks, Community and Sewage Management Program

The Township has adopted a new holding tank ordinance, a copy of which is contained in the Appendix D of this amendment.

Uncle John's Campground will be submitting the permit and construction documents for a sewerage system that will eliminate the need for a holding tank to serve the campground.

The Study Area No. 4 malfunctioning on-lot systems have been corrected as previously stated.

The Township will develop and include on its web page a discussion about on-lot system permitting, operations and maintenance.

The probable costs for small flow treatment systems, standard septic and leach field systems and sand mound systems are representative of the costs for such systems in 2015.

PENNVEST still maintains a funding program for the replacement of residential on-lot systems. The base eligibility requirements are a family income of not to exceed \$80,613, maximum loan amount of \$25,000, an interest rate of 1.0% for 20 years plus an annual service and insurance fee of 0.75%. More information for this program can be found on the PENNVEST website.

SECTION VI

EVALUATION OF ALTERNATIVES

A-C: The Township has entered into an intermunicipal agreement with Lake City Borough to provide for sewage treatment of 35,000 GPD, maximum monthly volume. This sewage flow will come from Country Gardens Mobile Home Park, Uncle John's Campgrounds and possibly the Lake Erie Community Park (should the Township determine it necessary to connect to the Lake City Borough sewerage system).

The sewerage systems for Country Gardens Mobile Home Park and Uncles John's Campground will be designed, construction, owned, operated and maintained by their respective owners. These systems will not be dedicated to the Township for ownership, operation or maintenance.

The Lake Erie Community Park will continue to utilize its existing on-lot sewage systems for the foreseeable future.

All property owners utilizing on-lot sewage system are responsible for the operation and maintenance of said systems, none are owned or will be owned or operated and maintained by the Township.

The only costs to the Township for the implementation of the Act 537 Official Sewage Plan is the cost for the plan development, no other funding has been provided for the plan's development, and the cost of the permitting of on-lot, small flows or holding tank systems.

The connection date of Country Gardens Mobile Home Park and Uncle John's Campground to the Lake City sewerage system will be predicated on the status of the Borough's wastewater treatment plant expansion. If at all possible the connection should be made by the end of 2016, acknowledging the Borough's construction would continue into 2017.

D. Provide Cost Estimates and Present Worth Analysis

This amendment provides for the connection of Country Gardens Mobile Home Park, Uncle John's Campground and the Lake Erie Community Park to the Lake City Borough sewerage system.

The costs associated with the sewerage system for each of these entities will be borne by their respective property owner. Each will be responsible for submitting the PADEP planning modules as well as permit module through the Township to the PADEP. Construction documents and relevant right-of-way documents will be presented to the Township in accordance with the Developers Agreements which will be signed after the PADEP approval of the planning modules.

Each will be responsible for paying a **one-time fee of \$600** to Lake City Borough as a connection fee. Should the connection not be made within the time frame of the Lake City upgrade, Lake City has reserved the right to change the connection fee in accordance with the laws of Pennsylvania.

With respect to the Lake Erie Community Park, the park will continue to use the existing on-lot sewage systems until such time as the park's development warrants the connection to the Lake City Borough sewerage system. However, the Township will, as required by the intermunicipal agreement, pay the debt service fee for the 3,600 GPD reserved for the Lake Erie Community Park, payment beginning upon completion of the Lake City wastewater treatment plant upgrade.

The intermunicipal agreement provides for the quarterly payment for sewage treatment services by the Township for all flow from Country Gardens Mobile Home Park, Uncle John's Campground and the Lake Erie Community Park. The payment will be based on the actual flow contributed by each entity, with the requirement that should no flow or a low flow volume be contributed the minimum payment will be equivalent to the debt service payment for the design flow (a monthly maximum value) attributed to each entity. The design flows are as follows:

Lake Erie Community Park	3,600 GPD
Uncle John's Campground	2,000 GPD
Country Gardens Mobile Home Park	29,400 GPD

The debt service payment* will be based on the actual costs for the upgrade of the Lake City wastewater treatment plant and any improvements necessary for the Lake City sewerage system to convey said flows. In 2014 the projected probable cost for these improvements was \$4,300,000*, again the actual cost based on permitting, design and construction will be used to determine the initial starting amount for the Lake City Borough sewerage system upgrades.

Based on the projected probable cost of \$4,300,000 and a sewage treatment plant design flow of 1,200,000 GPD Lake City's consultants projects the sewer rate to be:

\$71.50 per EDU for the first 6,000 gallons per quarter plus \$13.00 for each additional 1,000 gallons per quarter (these are estimated, final fees will be based on actual costs). These costs not include the cost for the construction or operation of the sewage collection and transport systems that would serve any Township customer.

An EDU is defined as a single family residential unit, therefore, for Country Gardens Mobile Home Park, each occupied lot will be considered a single family residential unit. Recreational use entities will be considered a single EDU.

It is anticipated that funding for the Lake City upgrade will be through PENNVEST. As such the projected quarterly debt service payment for \$4,300,000 is \$64,330.98*. The corresponding debt service payment for the aforementioned design flows are as follows:

Lake Erie Community Park	\$193*
Uncle John’s Campground	\$108*
Country Gardens Mobile Home Park	\$1,335*

*Projected Quarterly Debt Service Value – final to be based on the actual costs for the Lake City treatment and sewerage system upgrades

These debt service payments will only be applied if the quarterly payment for sewage flow from each entity calculates to be less than the debt service payment. As an example, it is not anticipated the Lake Erie Community Park will connect to the Lake City system for the foreseeable future, the Township however will be required to pay its corresponding debt service of \$193* quarterly. This could occur for Uncle John’s Campground due to it being a recreational use campground that may not have any activity during a quarter, as such it would be required to pay \$108* for the quarter. Country Gardens Mobile Home Park is a year round residential community whose flows has, in recent times not been below 12,000 GPD, therefore it would most likely pay based on the actual sewage flow.

In addition to Lake City fees a **Township administration fee of \$8.25** will be applied to the quarterly bill. The administration may be adjusted annually by the Township to provide for actual costs.

Based on the maximum monthly design flows the projected probable quarterly cost to each entity is as follows:

Lake Erie Community Park, 3,600 GPD:	$\$8.25 + \$4,205.50 = \mathbf{\$4,213.75^{**}}$
Uncle John’s Campground, 2,000 GPD:	$\$8.25 + \$2,333.50 = \mathbf{\$2,341.75^{**}}$
Country Gardens Mobile Home Park, 29,400* GPD:	$\$8.25 + \$33,813 = \mathbf{\$33,821.25^{**}}$

*Country Gardens Mobile Home Park is based on 90 EDU’s (72 existing lots and 18 new lots, 2015 lot usage is 68)

** These costs do not include the cost to construct or operate any sewage collection or transport system necessary for the connection to the Lake City system.

E. Provide for Analysis of Funding Methods

Uncle John’s Campground and Country Gardens Mobile Home Park are privately owned businesses, as such they will be responsible for all costs associated with the design, construction, operations and maintenance of their respective systems. Lake Erie Community Park is owned by the Township and for the foreseeable future will continue

using the existing on-lot sewage systems, should this change the Township would obtain financing to construct new sewerage systems.

The fees to be paid will be included in the rental fees received by the owners of Uncle John's Campground and Country Gardens Mobile Home Park. The Township may pay its fees through the rental costs of the park's facilities and through its General Funds.

F. Analyze the Need for Implementation

The need for connecting Uncle John's Campground and Country Gardens Mobile Home Park to the Lake City sewerage system is predicated on their existing systems not being adequate to meet their existing and projected sewage flows. The need for connecting the Lake Erie Community Park will be predicated on the future usage of the park, for the foreseeable future the park will continue utilizing its existing on-lot sewage systems.

G. Evaluate Administrative and Legal Authority to Implement Plan

The owners of Uncle John's Campground and Country Gardens Mobile Home Park have signed Sewer Service Agreements with the Township through which they have agreed to connect to the Lake City sewerage system as a means of meeting their businesses sewage needs.

SECTION VII

INSTITUTIONAL EVALUATION

A. Provide and Analysis of Existing Wastewater Treatment Authorities

The Township continues to provide oversight for the continued use of on-lot sewage systems in the Study Areas. As previously stated, the Township utilizes the Erie County Health Department to address issues with existing on-lot systems and for the approval of new on-lot systems. No change is anticipated through the implementation of this plan.

B. Provide and Analysis and Description of the Various Institutional Alternatives Necessary to Implement the Proposed Technical Alternative

The Township has entered into an intermunicipal agreement with Lake City Borough to provide sewage treatment service to the required Study Area businesses. The Township and the owners of Uncle John's Campground and Country Gardens Mobile Home Park have entered into Sewer Service Agreements for their connecting to the Lake City sewerage system.

C. Describe all Administrative and Legal Activities to Complete, Adopt and Administer the Selected Alternative

The owners of Uncle John's Campground and Country Gardens Mobile Home Park will be required to sign a Developers Agreement with the Township to facilitate the construction of their respective sewerage systems along with the PADEP planning and design modules necessary for the permitting of said sewerage systems.

D. Identify the Proposed Institutional Alternative for Implementing the Chosen Technical Wastewater Disposal Alternative

The Township continues to provide oversight for the continued use of on-lot sewage systems in the Study Areas. As previously stated, the Township utilizes the Erie County Health Department to address issues with existing on-lot systems and for the approval of new on-lot systems. No change is anticipated through the implementation of this plan

The Township has entered into an intermunicipal agreement with Lake City Borough for providing wastewater treatment service to the required Study Area businesses. The Township and the owners of Uncle John's Campground and Country Gardens Mobile Home Park have entered into Sewer Service Agreements for their connecting to the Lake City sewerage system.

SECTION VIII

IMPLEMENTATION SCHEDULE

A. Identify the Technical Wastewater Disposal Alternative Selected

The selected alternatives for the identified needs are:

1. The owners of Country Gardens Mobile Home Park will finance, design, construct, operate and maintain a sewerage system connecting to the Lake City Borough's sewerage system. They will all pay the quarterly (monthly if required by the Township) sewerage service fee based on the Sewer Service Agreement between the Township and owner of the Country Gardens Mobile Home Park.
2. The owners of Uncle John's Campground will finance, design, construct, operate and maintain a sewerage system connecting to the Lake City Borough's sewerage system. They will all pay the quarterly (monthly if required by the Township) sewerage service fee based on the Sewer Service Agreement between the Township and owner of the Uncle John's Campground.
3. Lake Erie Community Park will continue to utilize the existing on-lot sewage systems for the foreseeable future.
4. The identified malfunctioning on-lot sewage systems in Study Area No. 4 will be/are corrected and functioning properly.
5. The Township will develop and include an on-lot educational program on its web site.
6. The Township has adopted a new holding tank ordinance and will implement it as required.
7. The Township will review its Act 537 Official Sewage Plan every five years and update said plan every ten years.

B. Designate and Describe the Financing Plan for the Chosen Alternative

The owners of their respective sewerage systems will finance all components of said systems.

C. Designate and Describe the Implementation Schedule for the Chosen Alternative

IMPLEMENTATION SCHEDULE	
Advertise Act 537 Amendment for Public Comment	February – March, 2016
Submit Act 537 Amendment to PADEP, County Agencies, and Township Planning Commission for Comment	February 9, 2016
Notify Owners of Country Gardens Mobile Home Park and Uncle John’s Campground of amendment completion and timeline	February 9, 2016
Receive and Review Public Comments at Public Meeting	March 8, 2016
Adopt Act 537 Amendment	April 12, 2016
Submit Act 537 Amendment to the PADEP for Approval	April 19, 2016
Country Gardens Connection to Lake City*	December 31, 2016*
Uncle John’s Campground Connection to Lake City*	December 31, 2016*
*With approval of Lake City Borough, may extend into 2017 pending completion of Lake City wastewater treatment plant upgrade.	

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

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

A-45. Please provide evidence that Application complies with the DEP-approved Act 537 Plan
for each municipality included in the Requested Territory.

RESPONSE: Mainlines' wastewater systems operate in a manner consistent with applicable
municipal sewage planning requirements and DEP oversight.

With respect to Girard Township, Mainlines has produced the Township of Girard Act 537 Official
Sewage Facilities Plan Update Amendment dated December 2015. Mainlines' wastewater
facilities serving Imperial Point Mobile Home Park predate that amendment and continue to
operate without any identified inconsistency, required revision, or corrective action under the
Township's Act 537 planning framework.

With respect to Waterford Township, Mainlines has made reasonable efforts to obtain Act 537
planning documents, including telephone calls and email inquiries to the Township and related
offices, but has not received responsive materials. Neither Waterford Township, Erie County, nor
DEP has identified any Act 537 noncompliance or required planning action related to the
wastewater system serving Hickory Hill Country Village Mobile Home Park.

In both municipalities, Mainlines' wastewater systems are permitted, inspected, and regulated by
DEP, and DEP has not required Act 537 plan revisions, planning modules, or exemptions as a
condition of continued operation. The absence of Act 537 enforcement actions or corrective
requirements is being presented as evidence that the systems are operating consistently with
applicable sewage planning requirements.

PROVIDED BY: Paul Christopher Luciano

DATE: January 23, 2026

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

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

A-50. Please verify that, pursuant to 52 Pa. Code § 3.501(f)(2), Mainlines served a complete copy of the Application with exhibits upon each water or wastewater utility, municipal corporation or authority which provides wastewater collection, treatment or disposal service to the public and whose service area abuts or is within one mile of the Requested Territory, as amended by Mainlines in supplemental information filed with the Commission

RESPONSE: Mainlines verifies that, based on its service records and a review of wastewater systems within one mile of the Requested Territory, no other public utility, municipal corporation, or authority provide wastewater collection, treatment, or disposal service to the public in or near the territory. The only wastewater systems located within one mile are those owned by Imperial Point Mobile Home Park and Waypoint Mobile Home Park, both of which are served by Mainlines.

PROVIDED BY: Paul Christopher Luciano

DATE: November 21, 2025

SUPPLEMENTAL RESPONSE: The prior response incorrectly referenced a “Waypoint Mobile Home Park.” No such mobile home park exists. Rather, Waypoint Property Management, LLC is an affiliated entity that manages the Hickory Hill Country Village Mobile Home Park. The Hickory Hill Country Village Mobile Home Park is served by Mainlines.

All other statements in the Response to A-50 remain unchanged.

PROVIDED BY: Paul Christopher Luciano

DATE: January 23, 2026

VERIFICATION

I, Paul C. Luciano, _____, on behalf of Mainlines, Manholes & Wastewater Treatment, Inc., hereby state that the facts set forth in the foregoing document 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 in this matter. This verification is made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.



Name:

Title:

Mainlines, Manholes & Wastewater Treatment, Inc.