

MARK J. SHAW, ESQ.
ADMITTED IN PA AND OH
DIRECT DIAL 814-870-7607
E-MAIL: MSHAW@MIJB.COM

May 1, 2026

VIA ELECTRONIC MAIL

Administrative Law Judge Eranda Vero
Pennsylvania Public Utility Commission
Office of Administrative Law Judge
801 Market Street, 4th Floor
Philadelphia, PA 19107
evero@pa.gov

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

Dear Judge Vero:

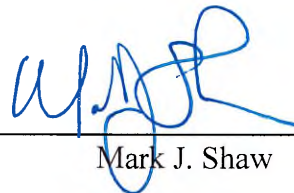
Attached please find Conneaut Lake Park Water Corporation, Inc.'s Stipulation of Fact and Request for Admissions in the above-referenced proceeding. An electronic copy of this letter and Certificate of Service are being filed through the Commission's eFiling portal. Copies have been served in accordance with the attached Certificate of Service.

If you have any questions or require additional information, please feel free to contact me at your convenience.

Very truly yours,

MacDONALD, ILLIG, JONES & BRITTON LLP

By _____



Mark J. Shaw

MJS/lmf/4920-3521-5271 v.1

Attachments

cc: Matthew L. Homsher, Secretary (*Cover Letter and Certificate of Service Only via eFile*)
All Parties of Record

CERTIFICATE OF SERVICE

I hereby certify that I have this 1st day of May, 2026, 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):

Michael Podskoch Esq.
Adam J. Williams, Esq.
PA PUC BIE Legal Technical
Second Floor West
400 North Street
Harrisburg, PA 17120
mpodskoch@pa.gov
adawilliam@pa.gov

Harrison W. Breitman, Esq.
Ryan Morden, Esq.
Janna Williams, Esq.
Office of Consumer Advocate
555 Walnut Street 5th
Floor Forum Place
Harrisburg, PA 17101
CLPWC529@paoca.org

Alexander R. Stahl Esq.
Aqua Pennsylvania Inc.
762 W. Lancaster Avenue
Bryn Mawr, PA 19010
astahl@aquaamerica.com

Stephen Kelkenberg, Esq.
Buchanan Ingersoll & Rooney
Union Trust Building
501 Grant St., Suite 200
Pittsburgh, PA 15219
stephen.kelkenberg@bipc.com

Rebecca Lyttle, Esq.
Steven Gray, Esq.
Assistant Small Business Advocate
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
relyttle@pa.gov
sgray@pa.gov

John Povilaitis, Esq.
Alan Seltzer, Esq.
Buchanan Ingersoll & Rooney PC
409 North Second Street, Suite 500
Harrisburg, PA 17101-1357
john.povilaitis@bipc.com
alan.seltzer@bipc.com

Respectfully submitted,



Mark J. Shaw, Esq. (Pa. ID No. 50763)
MacDONALD, ILLIG, JONES & BRITTON LLP
100 State Street, Suite 700
Erie, Pennsylvania 16507-1459
(814) 870-7607

Attorneys for:
Conneaut Lake Park Water Corporation

**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.	:	

STIPULATION OF FACT AND REQUEST FOR ADMISSIONS

Conneaut Lake Park Water Corporation, Inc. ("CLPWC"), by and through its undersigned counsel, hereby file this Stipulation of Fact and Request for Admissions in the above referenced case. None of the parties object to the admission of this fact and these admissions into evidence in this matter.

Stipulation of Fact

1. The water rates for the water system now owned by CLPWC from 2009 until the fourth quarter of 2024 were \$14.39 per month for year-round residents and \$7.20 per month for seasonal residents.

Admissions by I&E

1. Unaccounted for water cannot be accurately measured when not all customers are metered.
2. A Notice of Violation issued by the Pennsylvania Department of Environmental Protection is not an Order of the Department.

Admissions by OCA

1. Mr. Joseph purchased a water system through bankruptcy proceedings in 2021 which did not have individual residential meters.
2. There is no specific requirement in the Public Utility Code or regulations to have a publicly accessible website.

Dated: May 1, 2026

Respectfully submitted,

/s/ Mark J. Shaw

Mark J. Shaw, Esq. (PA I.D. No. 50763)
MacDONALD, ILLIG, JONES & BRITTON LLP
100 State Street, Suite 700
Erie, Pennsylvania 16507-1459
(814) 870-7607
FAX (814) 454-4647
mshaw@mijb.com

4905-9237-0599 v.1