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May 11, 2026

**VIA ELECTRONIC MAIL**

Mr. Matthew Homsher  
Secretary of the Commission  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, PA 17120

Re: Conneaut Lake Park Water Corporation, Inc. Metering Program Compliance  
Docket Nos. A-2022-3031711 and A-2022-3031712

Dear Secretary Homsher:


Attached please find the Metering Program and Supporting Data Submitted on Behalf of Conneaut Lake Park Water Corporation, in the above-captioned 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/nes/4928-6545-8837 v.1

Attachments

cc: All Parties of Record  
Paul Zander (*via electronic mail*)

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

|  |   |                            |
|--|---|----------------------------|
| Joint Application of Trustees of Conneaut  | : |                            |
| Lake Park, Inc. and Conneaut Lake Park     | : |                            |
| Water Corporation, Inc. under Section      | : | Docket Nos. A-2022-3031711 |
| 1102(a) of the Pennsylvania Public Utility | : | A-2022-3031712             |
| Code, 66 Pa. C.S. § 1102(a)                | : |                            |

**Metering Program and Supporting Data Submitted on Behalf of  
Conneaut Lake Park Water Corporation**

Conneaut Lake Park Water Corporation ("the Company") hereby submits this Metering Program and Supporting Data pursuant to the Commission's April 20, 2023 Order at Docket Nos. A-2022-3031711 and A-2022-3031712.

**Background**

The water system currently owned by the Company has been in existence for nearly 100 years. The water system was originally part of the Conneaut Lake Amusement Park ("the Park") complex that served water to the Park and the surrounding cottages owned by the Park. Over time, the Park entered into long term leases for the cottages. The Park operated the water system outside of Commission jurisdiction until 1999 when the Commission notified the Park that the water system was subject to the Commission's jurisdiction due to the nature of the long term leases. Meters were not included in the original design of the water system and have never been added.

In the late 1990s, the Park began struggling financially. The Pennsylvania Attorney General began an investigation and ultimately charged the Park Trustees with mismanagement that led to the appointment of new Trustees in 2014. To protect the Park from a sheriff's sale, the new Trustees filed for bankruptcy. Under the approved bankruptcy plan, the new Trustees sold off the

cottages to the third parties with whom they had entered into long term leases. The new Trustees were attempting to improve the Park and the water system when COVID hit, shutting the Park down. The Park never recovered. As a result, the Park missed its payments due under the approved reorganization plan, and the Bankruptcy Court approved a public auction of the Park's assets, including the water system.

The water system was ultimately purchased with the remaining assets of the Park by Todd Joseph who placed the water system assets in to the Company. Although the Commission was given notice of the sale, the Commission did not appear.

Subsequent to the sale, the Company and the Trustees filed a Joint Petition before the Commission on March 31, 2022 seeking issuance of a Certificate of Public Convenience. By Order dated April 23, 2023, the Commission granted that Petition and issued the Certificate of Public Convenience to the Company.

### **Metering Program and Supporting Data**

In Paragraph 7 of its Order, the Commission stated the following:

That, at the time of filing its next base rate case or no later than three years from the issuance of the Certificate of Public Convenience pursuant to Ordering Paragraph 3, Conneaut Lake Park Water Corporation, Inc. shall finalize and submit a proposed metering program that would result in all customers except fire protection customers being metered and shall provide testimony and supporting data that addresses each of the following regarding the proposed metering program: (1) the numbers and sizes of water meters; (2) estimated investment costs for meters, appurtenances, meter reading devices, software, installation, etc.; (3) estimated annual operating expenses for meter reading, billing, maintenance, depreciation, etc.; (4) the date by which all customers except fire protection customers would be metered; and (5) whether the proposed revenue requirement includes metering program costs.

In accordance with Paragraph 7 of the Commission's Order, the Company provides the following information:

1. There are 152 service accounts that will need 152 meters; the size of the meters required for these accounts will be a 3/4" meter, likely a Sensus brand. See attached service address list attached hereto as Company's Exhibit 1.
2. The investment costs for the meters, appurtenances, meter reading devices, software, installation, etc. is projected at between \$92,000 - \$120,000 (best case) and \$988,000 (worst case). The best case assumes that the meter and transceiver can be purchased and installed for about \$600 - 800 per meter, which assumes no problems with access and the existing customer service line. Our engineer recommends that the company purchase meters with radio transceivers. See attached examples of the meter and transceiver as Company's Exhibit 2. The worst case scenario assumes that there are access problems and problems with the existing customer service line. These are currently pricing out at a little over \$200 each for the equipment only. See price estimates attached hereto as Company's Exhibit 3 for the worst case scenario. The reality is likely some range in the middle, probably in the \$500,000 range. Under the Phased plan proposed by the Company's engineer, the engineer will conduct an investigation into the system to get a better sense of the condition of each customer's access and service line. The cost of that evaluation is estimated at \$20,000. In addition, a remote meter reader will cost in the range of \$1,500 - \$3,000. This is a one-time cost until the reader needs to be replaced.
3. The annual estimated operating expenses for meter reading, billing, maintenance, depreciation, etc. are estimated at \$2,500 - \$5,000 per year. This is based on the

current quarterly billing practice of the Company, as well as maintaining smart meter reader software and the added labor of managing the meter data and billing.

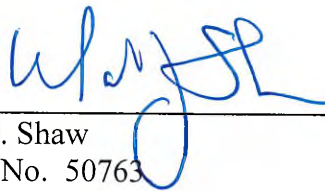
4. The customers will be metered on or before August 1, 2029.
5. The current revenue requirement does not include the metering program. The Company expects to fund the capital portion of this program through a PennVEST loan and would expect the revenue requirement to be in place by 2029. The base rate will also need to be adjusted at that time to account for the added O&M expenses associated with the meters.

### **Discussion**

The Company is currently involved in a Section 529 Petition filed by the Bureau of Investigation and Enforcement seeking to order Aqua Pennsylvania, Inc. to take over the Company's water system. Despite this, the Company has moved forward with hiring a professional engineer with expertise in water systems to evaluate the system, including metering options. It is his opinion that metering is not necessary for a system of this size, but understands the Commission's requirements.

The challenge in metering the water system is how it was created and evolved over time. In addition, many of the customer lines are old and need to be replaced regardless of the metering effort. The Company is also concerned that the cost of installing meters as estimated above will far exceed any benefit of having meters. Nonetheless, the Company will proceed as ordered. In order to obtain a more refined estimate, the Company's engineer has proposed to conduct an investigation into the condition of the existing water lines and how best to meter these properties. Of course, this is all subject to the Company, in fact, still owning the system.

Respectfully submitted,



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

Attorneys for Applicant,  
Conneaut Lake Park Water Corporation, Inc.

MJS/nes/4939-0283-2553 v.1

**SERVICE ADDRESS**

12241 Lake St

**WOODLAND**

10783 Woodland Ave

10793 Woodland Ave

10805 Woodland Ave

10807 Woodland Ave

**BROWN**

10857 Brown St

10860 Brown St

10869 Brown St

**GEORGE**

11003 George St

11035 George St

**REED**

12495 Reed Ave

12512 Reed Ave

12516 Reed Ave

12534 Reed Ave

12543 Reed Ave

12554 Reed Ave

12367 Reed Ave

**SUNSET**

12221 Sunset Dr

12231 Sunset Dr

12234 Sunset Dr

**HENRY**

10933 Henry St

10936 Henry St

10944 Henry St

10974 Henry St

10987 Henry St

10997 Henry St

11005 Henry St

11019 Henry St

11036 Henry St

11041 Henry St

11043 Henry St

11044 Henry St

11065 Henry St

**COMPANY'S  
EXHIBIT 1**

|                         |
|-------------------------|
| 11067 Henry St          |
| 11070 Henry St          |
| 11062 Henry St          |
| <b>LAKE</b>             |
| 12375 Lake St           |
| 12366 Lake St           |
| 12386 Lake st           |
| 12398 Lake St           |
| 12414 Lake St           |
| 12425 Lake St           |
| 12435 Lake St Condo 101 |
|                         |
| 12435 Lake St Condo 201 |
| 12435 Lake St Condo 301 |
| <b>LAKEFRONT</b>        |
| 10895 Lake front St     |
| 10901 Lake front St     |
| 10911 Lake front St     |
| 10913 Lake front St     |
| 10921 Lake front St     |
| 10926 Lake Front St     |
| 10929 Lake Front St     |
| 10925 Lake Front St     |
| <b>N. LAKEFRONT</b>     |
| 12544 N Lakefront Dr    |
| 12556B N Lakefront Dr   |
| 12556A N Lakefront Dr   |
| 12564 N Lakefront Dr    |
| 12582 N Lakefront Dr    |
| 12587 N Lakefront Dr    |
| 12589 N Lakefront Dr    |
| 12601 N Lakefront Dr    |
| 12602 N Lakefront Dr    |
| 12572 N Lakefront Dr    |
| <b>COMSTOCK</b>         |
| 12220 Comstock St       |
| 12234 Comstock St       |
| 12236 Comstock St       |
| 12239 Comstock St       |
| 12272 Comstock St       |

**COMPANY'S  
EXHIBIT 1**

|                   |
|-------------------|
| 12273 Comstock St |
| 12276 Comstock St |
| 12283 Comstock St |
| 12288 Comstock St |
|                   |
| 12291 Comstock St |
| 12302 Comstock St |
| 12303 Comstock St |
| 12449 Comstock St |
| 12455 Comstock St |
| 12465 Comstock St |
| 12492 Comstock St |
| 12499 Comstock St |
| 12513 Comstock St |
| 12525 Comstock St |
| 12538 Comstock St |
| 12545 Comstock St |
| 12549 Comstock St |
| 12553 Comstock St |
| 12554 Comstock St |
| 12562 Comstock St |
| 12563 Comstock St |
| 12572 Comstock St |
| 12573 Comstock St |
| 12583 Comstock St |
| 12587 Comstock St |
| 12596 Comstock St |
| 12597 Comstock St |
| 12608 Comstock St |
| 12626 Comstock St |
| 12636 Comstock St |
| 12641 Comstock St |
| 12645 Comstock St |
| 12646 Comstock St |
| 12656 Comstock St |
| 12665 Comstock St |
| 12666 Comstock St |
| 12676 Comstock St |
| 12689 Comstock St |
| <b>UTLEY</b>      |

COMPANY'S  
EXHIBIT 1

|                              |
|------------------------------|
| 10825 Utley Ave Condo<br>101 |
| 10825 Utley Ave Condo<br>102 |
| 10825 Utley Ave Condo<br>103 |
| 10833 Utley Ave              |
| 10836 Utley Ave              |
| 10845 Utley Ave              |
| 10854 Utley Ave              |
| 10861 Utley Ave              |
| 10862 Utley Ave              |
| 10867 Utley Ave              |
| 10868 Utley Ave              |
| 10877 Utley Ave              |
| <b>CENTER ST W</b>           |
| 12124 Center St W            |
| 12132 Center St W            |
| 12172 Center St W            |
| 12222 Center St W            |
| 12251 Center St W            |
| 12156 Center St W            |
| 12255 Center St W            |
| 12263 Center St W            |
| <b>CENTER ST</b>             |
| 12305 Center St              |
| 12315 Center St              |
| <b> </b>                     |
| 12321 Center St              |
| 12413 Center St              |
| 12428 Center St              |
| 12439 Center St              |
| 12447 Center St              |
| 12476 Center St              |
| 12489 Center St              |
| 12536 Center St              |
| 12546 Center St              |
| 12556 Center St              |
| 12576 Center St              |
| 12612 Center St              |

**COMPANY'S  
EXHIBIT 1**

12626 Center St

**KEPLER**

10932 Kepler Ave

10975 Kepler Ave

11013 Kepler Ave

11016 Kepler Ave

11006 Kepler Ave

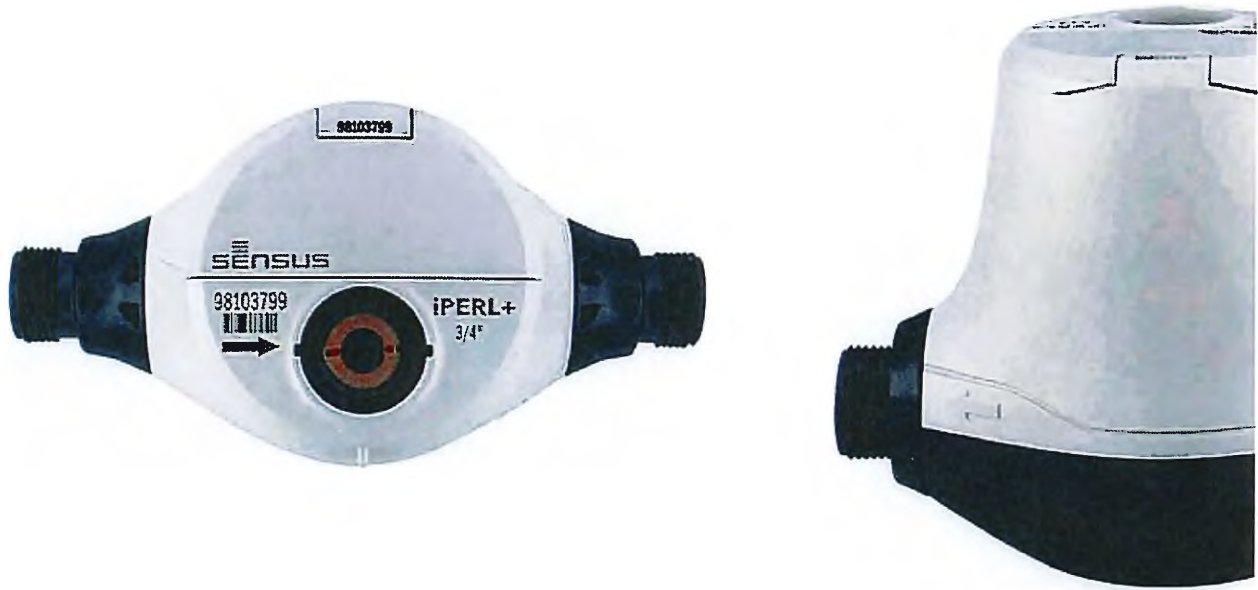
11020 Kepler Ave

11030 Kepler Ave

11036 Kepler Ave

11038 Kepler Ave (11033)

**COMPANY'S  
EXHIBIT 1**



[Request Proposal](#)

## iPERL+: The Future of Smart Water Metering

iPERL+ redefines water metering, offering an integrated solution that not only ensures seamless system compatibility but also maintains unmatched...

COMPANY'S  
EXHIBIT 2

More +

- 5/8", 5/8" x 3/4", 3/4" and 1" sizes available in potable and reclaim versions.
- 3/4" and 1" available in residential fire service (UL 327b).
- Starts registering flow as low as 0.03 gpm (0.007 m<sup>3</sup>/hr).
- Can be installed horizontally, vertically or diagonally.
- Compatible with current Sensus AMI/ AMR systems.
- Reduces maintenance and cost.
- Allows remote management, monitoring, and diagnosis.
- Logs up to 120 days of hourly consumption data.
- Available in polymer or metal flow tube casings.

Less —

## Description



iPERL+ is engineered to deliver unparalleled low flow accuracy of +/- 3%, providing you with deeper insights into customer usage patterns, leaks, and other critical alarm thresholds. Featuring 14 advanced smart water alarms for continuous, high, and reverse flow, your utility has the power to address issues promptly and prevent larger problems. With the ability to log 120 days of data and 20-year accuracy, iPERL+ ensures long-term, precise data collection.



**Request Proposal**

**COMPANY'S  
EXHIBIT 2**

Our SmartPoint® 510M non-pit set module is a radio transceiver that gives you RF inbound and outbound access to water measurements and ancillary device diagnostics. It's designed for non-submersible/non-pit (surface-mount) installations. With two-way communication ability, it serves as a walk-by or drive-by end point, a fixed-base end point or any combination of those. This versatility gives you highly flexible data collection options and simplifies both current operations and network evolution.

The 510M collects data from the meter register and transmits it to the collection device. In walk-by/drive-by mode, the transceiver collects data and waits for an activation signal from the Vehicle Gateway base station (VGB) or hand-held device (HHD). When it receives a signal, it transmits the readings, the meter identification number and any alarms. As a fixed-base end point, the 510M interacts with strategically placed base stations in the service area. Migrate from walk-by/drive-by to fixed base by simply adding a base station.

Less —

- Wall-mounted installation
- Industry-leading two watts broadcast power
- Patented TouchCoupler interfaces with encoded meters via existing two-wire installations
- Connect multiple registers and ancillary devices (such as acoustic monitoring) to a single SmartPoint
- Hourly readings monitor continuous flow, alert to leak conditions
- Extracts usage profiles to inform customers and resolve disputes
- Easy updates to transceiver
- Easy migration to fixed base by simply installing a base station

## Description



## Benefits to you

- Delivers a fast, efficient, reliable connection at minimal cost
- Minimizes new infrastructure investment
- Enables effective leak detection
- Offers highly flexible data collection options, including walk-by/drive-by and fixed base
- Simplifies installation, updates, operations and network evolution

## Specifications

- Wall-mounted installation for non-pit set, non-submersible environments; meter interfaces to the FlexNet<sup>®</sup> communication network
- Dimensions: 5 9/16" W x 5 1/2" H x 3" D
- Weight: 1.13 lbs.
- Operating temperature: -22° F to +185° F (-30° C to +85° C)
- Dual- or single-port options
- Compatible with a range of Sensus and non-Sensus encoded metering systems (via TouchCoupler, wired or Nicor)
- 2 watts broadcast power
- Frequency range: 900-950 MHz
- 8000 channels, in 6.25 kHz steps
- Proprietary narrow band modulation
- Non-volatile memory
- Lithium thionyl chloride batteries with hybrid layer capacitor
- 20-year warranty
- FCC CFR 47: Part 24D, Part 101C, Part 15 licensed operation
- Industry Canada (IC) RSS-134, RSS-119

# ESTIMATE

Stone Diversified LLC  
3880 State Highway 173  
Cochranon, PA 16314

stonediversifiedllc@gmail.com  
+1 (724) 699-1541



**Bill to**  
CLP Water Park LLC

**Ship to**  
CLP Water Park LLC

## Estimate details

Estimate no.: 1023  
Estimate date: 02/16/2026

| #            | Date | Product or service  | Description   | Qty | Rate       | Amount            |
|--------------|------|---------------------|---|-----|------------|-------------------|
| 1.           |      | Excavating/Plumbing | Replace Customer Service Line and Add Meter pit:<br><br>This estimate is to install a new water service in the CLP water system.<br><br>New service will include, pipe, 3/4x5/8 meter pit with meter and touch reader in the lid, curb stop, & curb box.<br><br>Saddles and corps will be reused if found to be in working order.<br><br>Reclamation will include seed and straw mulch.<br><br>Contractor not responsible for damage to unmarked utilities.<br><br>This estimate is per service and pricing is good for 90 days from the date on this estimate. | 1   | \$7,300.00 | \$7,300.00        |
| <b>Total</b> |      |                     |   |     |            | <b>\$7,300.00</b> |

Note to customer  
Thank You

Accepted date

Accepted by

COMPANY'S  
EXHIBIT 3

**ESTIMATE**

Garlands llc  
PO Box 1054  
Saegertown, PA 16433-1054

garlandslc@myyahoo.com  
+1 (814) 795-7610

**Bill to**

CLP Water Park LLC  
CLP Water Park LLC  
11364 connect trail ext  
Conneaut Lake  
pa

**Ship to**

CLP Water Park LLC  
CLP Water Park LLC  
11364 connect trail ext  
Conneaut Lake  
pa

**Estimate details**

Estimate no.: 1017  
Estimate date: 02/16/2026

| #  | Date | Product or service                          | Description  | Qty | Rate         | Amount            |
|----|------|---|--|-----|--------------|-------------------|
| 1. |      | <b>water service replacement with meter</b> | Water service replacement with water meter and water meter pit Per service | 1   | \$6,850.00   | \$6,850.00        |
|    |      |   |  |     | <b>Total</b> | <b>\$6,850.00</b> |

Accepted date

Accepted by

COMPANY'S  
EXHIBIT 3

**CERTIFICATE OF SERVICE**

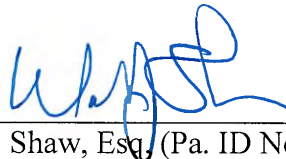
I hereby certify that I have this 11th day of May, 2026, served a true copy of the foregoing document upon the parties, listed below, by the manner indicated blow, and in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a party):

Allison Kaster, Esq.  
Stephanie Wimer, Esq.  
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[stwimer@pa.gov](mailto:stwimer@pa.gov)

NazAarah Sabree, Esq.  
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[ra-sba@pa.gov](mailto:ra-sba@pa.gov)

Darryl Lawrence, Esq.  
Office of Consumer Advocate  
555 Walnut Street 5th  
Floor Forum Place  
Harrisburg, PA 17101  
[ra-oca@paoca.org](mailto:ra-oca@paoca.org)

Respectfully submitted,



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