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May 22, 2026

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

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 Mr. Homsher:

Attached please find the written testimony and related exhibits of the witnesses of Conneaut Lake Park Water Corporation, Inc. in the above-captioned proceeding. Any documents that include confidential security information have been redacted or removed. The unredacted documents have been mailed to the Commission in sealed, labeled envelopes via first-class mail. 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/4900-7378-6538 v.1
Attachments
cc: ALJ Eranda Vero *(via e-mail)*
All Parties of Record

CERTIFICATE OF SERVICE

I hereby certify that I have this 22nd 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):

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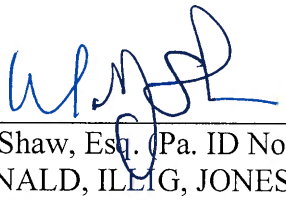
Respectfully submitted,



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PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

DIRECT TESTIMONY

OF

Steven R. Halmi, P.E.

ON BEHALF OF RESPONDENT

March 6, 2026

Q: Please state your name for the record.

A: My name is Steven Halmi.

Q: Where do you work?

A: I am the President and Principle Engineer of Deiss & Halmi Engineering, Inc.

Q: What kind of work does Deiss & Halmi Engineering, Inc. do?

A: Deiss & Halmi Engineering, Inc. provides consulting engineering services to municipalities, municipal authorities, industries, businesses and individuals, specializing in the areas of environmental and civil engineering. Attached as Exhibit A to this Statement is a true and correct copy of the current description of the disciplines and services provided by my company together with a representative client list.

Q: What is you professional and educational background and experience?

A: I am a registered professional engineer in Pennsylvania. I have a B.S. Degree in Civil Engineering and Environmental Engineering from Penn State University in 1994 and a M.S. Degree in Civil Engineering and Environmental Engineering from Cornell University in 1996. I have been the engineer on numerous projects involving municipal planning and engineering, water treatment and distribution systems and wastewater collection and treatment systems for nearly 30 years. I am a member of the Water Environment Federation, the American Water Works Association and the National Society and Pennsylvania Society of Professional Engineers. Attached as Exhibit B to this Statement is a true and correct copy of my Curriculum Vitae. Over the last five years, I have worked on numerous community water systems, as well as non-transient and transient noncommunity water systems. Attached as Exhibit C is a list of the systems I have worked on.

Q: On whose behalf are you testifying?

A: Conneaut Lake Water Corporation.

Q: What is the purpose of your testimony?

A: The purpose of my testimony is to present the results of an evaluation of the Conneaut Lake Water Corporation's water treatment, storage and distribution system.

Q: Were you asked by Conneaut Lake Park Water Corporation to conduct an evaluation if the water system?

A: Yes, I was.

Q: What were you requested to evaluate?

A: I was asked to conduct an evaluation of the water treatment and distribution system and to produce a list of recommended improvements, identifying the priority of those recommended improvements. I was also tasked with arranging for an inspection of the water tank by a professional tank management company and reviewing that analysis. I was also tasked with reviewing the feasibility of installing meters for all residential customers, including costs and benefits.

Q: Have you completed that work?

A: Yes.

Q: Was this work done in your capacity as a professional engineer with nearly 30 years of water system experience?

A: Yes.

Q: Did you prepare a report of your evaluation?

A: Yes. Attached hereto as Exhibit D is a true and correct copy of my report.

Q: Can you tell me what your findings were regarding system performance?

A. The System has for the most part provided reliable service with sufficient water quantity and quality. The exceptions have mostly been when distribution piping leaks or service line leaks have occurred that have required portions of the distribution system to be shut down for repairs. The quantity of water available has otherwise been reliable. There have been no recent issues with the wells or treatment system needing to be shut down for extended periods.

Q: What were your recommendations for the wells and wells pumps?

A: I recommend that the wells and well pumps be refurbished, which would include removing the pump and motor for each well to be evaluated and refurbished, a camera evaluation of the condition of the well, cleaning the well and installing a transducer to assist with future drawdown evaluations.

Q: What were your recommendations for the treatment system?

A: While the treatment system is working effectively, the system does need some maintenance. I recommended to replace the filter media in all 3 filter tanks; confirm operation and replace as necessary various manual and automatic valves and chemical feed pumps, ensure adequate spare parts including a spare PLC and confirm the continued need for the sodium silicate treatment and modify the DEP permit to re-include in the permit.

Q: Did you also include any recommendations for the building which houses the treatment system?

A: Yes, the water system believes that several improvements are needed to the building, which I agree with. Those include replacing the roof, improving insulation; adding heating and upgrading the electrical system.

Q: Did you have an inspection conducted of the water tank?

A: Yes, the Company hired Preferred Tank & Tower Maintenance Division, Inc. ("PMD"), who inspected the tank. PMD had a number of recommendations for tank improvements, which I agree with.

Q: Did you also evaluate the water distribution system?

A: Yes.

Q: What are your recommendations for the distribution system?

A: Based upon my discussions with the operators and contractors who have worked on the system, I identified several areas that should have the lines replaced. The areas identified include Kepler Avenue, Comstock Street, Henry Street, Center Street, and along the lakefront properties. In addition, the system needs more operable shut off valves in the distribution system to minimize the impacts of leaks and shut downs to fix leaks. It is also important to create a comprehensive map of the system.

Q: As a part of your evaluation, did you evaluate the need and potential costs of providing meters for all residential customers.

A: Yes, I do not recommend meters. In addition, it is difficult to determine what the installation of meters would cost as that cost may be highly variable depending on the condition of the service line and the suitableness of any location to place a meter.

Q: Did you provide an option of probable cost of the recommendations made in this report?

A: Yes.

Q: What is the cost?

A: The total costs would be approximately $2.8 million, but that could vary due to a variety of unknowns. I recommend that the work be spread out of several phases with the treatment

plant and building work being done first followed by the tank and then the distribution system. This would also spread out the costs to keep rate increases gradual overtime.

Q: Have the opinions you have expressed in this direct testimony been to a reasonable degree of scientific and engineering certainty.

A: Yes, they have.

Q: Does this conclude your direct testimony?

A: Yes, it does. However, I reserve the right to file such additional testimony as may be necessary or appropriate.

PA PUC, I&E v. Conneaut Lake Park Water Corporation, Inc.
Docket Nos. P-2024-3051855, I-2024-3051857
Direct Testimony of Steven R. Halmi, P.E. on behalf of
Conneaut Lake Park Water Corporation, Inc.

VERIFICATION

I, Steven R. Halmi, President and Principal Engineer of Deiss & Halmi Engineering, Inc., hereby state that the facts set forth in the foregoing Direct Testimony of Steven R. Halmi, P. E., are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Dated: 4/21/2026

Steven R. Halmi, P.E.
President and Principal Engineer
Deiss & Halmi Engineering, Inc.

PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

DIRECT TESTIMONY

OF

Todd Joseph

ON BEHALF OF RESPONDENT

March 6, 2026

Q: Please state your name and business address for the record.

A: My name is Todd Joseph and my business address is 11364 Konneyaut Trail Extension, Conneaut Lake, PA 16316.

Q: By whom are you employed and in what capacity?

A: I am sole member of CLP Water LLC, which is the sole shareholder of Respondent Conneaut Lake Park Water Corporation, Inc. I am not an employee of either company.

Q: Please describe your educational and professional background.

A: I have a B.S. in finance.

Q: What business experience do you have?

A: I am self-employed and own a myriad of companies in the real estate sector. I have 28 years in real estate development and redevelopment. I have been the owner and general contractor on each of my development projects, many of which have been in excess of $5,000,000.

Q: On whose behalf are you presenting this testimony?

A: I am presenting this testimony on behalf of the Respondent.

Q: What is the purpose of your testimony?

A: The purpose of my testimony is to support the continued ownership and operation of water system currently owned and operated by Respondent Conneaut Lake Park Water Corporation, Inc. I will refer to the Respondent as the Company throughout my testimony.

Q: How long has the Respondent been operating the water system?

A: Respondent has been operating the water system since March of 2021.

Q: Briefly describe how Respondent came about becoming the owner of the water system.

A: The water system was previously owned and operated by the Trustees of Conneaut Lake Park, Inc. The Trustees had been forced into bankruptcy due to a failure to pay taxes and, as a result the assets of the Trustees were liquidated. The water system was part of those assets. I made an offer through one of my companies to buy the assets of the Trustees and the Bankruptcy Court approved the same in March 2021. I placed the water system assets into the Company.

Q: When did the Pennsylvania Public Utility Commission approve that transfer of the water system?

A: On April 30, 2023, the Commission entered an order approving the transfer and issuing the Certificate of Public Convenience to the Company and granted the Trustees' abandonment of the service.

Q: What was the condition of the water system when you acquired it?

A: The condition of the water system was not very good; it was operable but it needed what appeared to be a substantial amount of work.

Q: Am I correct that several months after the Company obtained the Commission approval, the Company submitted for a rate increase to provide the funds needed to make the needed improvements for the system?

A: Yes.

Q: Was there significant opposition to the rate increase you sought?

A: Yes.

Q: How long did that rate case take?

A: Although we filed for the rate increase in August 2023, a rate increase, that was significantly less than requested, was not approved by the Commission until August 2024, and did not go into effect until October 2024.

Q: Am I correct that the resolution of the rate case was based on a settlement reached by the parties?

A: Yes.

Q: Ultimately was the agreed upon rate sufficient to fund the improvements needed for the system?

A: No, in fact, the rate increase did not even cover the operating expenses of the system.

Q: Am I correct that one of the terms of this settlement was that the Commission's Bureau of Investigations and Enforcement was to file a Section 529 case against the Company to determine whether the water system should be taken from the Company?

A: Yes.

Q: And, on October 28, 2024, the Commission's Bureau of Investigations and Enforcement in fact filed a Section 529 petition against the Company, which is the case for which you are now providing testimony, correct?

A: Yes.

Q: In the time that you have owned and operated the water system, how much money have you had to invest in the system to keep it running, which was not covered by the rate revenue generated by the water system?

A: I have invested over $300,000 to keep the water system running since March of 2021. Those costs continue to rise as this litigation continues and as I continue to put band aids

on the system until I have financial certainty that I will continue to own and operate the system, and that the Company can charge the rates needed to fund the needed improvements. The Company is unable to get any financing for the projects this system needs with this cloud hanging over the Company that threatens to take the water system away from the Company, and without obtaining a rate increase that would cover the water system's basic operating costs as well and the costs of financing the needed improvements.

Q: Am I correct that you hired a professional licensed water operator to run the water system?

A: Yes. I hired the company that had been running the system for the Trustees. I have kept that company in place since then. Recently, the company was purchased by another company, but it has kept on the same day-to-day operator. The new company is as equally, if not more, qualified than the prior company to operate the water system.

Q: What level of involvement do you have in the operation of the water system.

A: In terms of its operation, I leave all operational decisions up to the operators who are the experts. I only get involved in the water system when there is a line break and I need to authorize the expenditures to fix the line, which usually are paid for directly by me. I also have transferred all day-to-day administrative responsibility to my general manager, Jaclyn McCoy. She handles calls, complaints, bills, payments and things along those lines.

Q: Has the Company hired a water engineering consultant to conduct a formal evaluation of the water system?

A: Yes, the Company hired Deiss & Halmi Engineering, Inc.

Q: Has that evaluation been completed?

A; Yes, Mr. Halmi completed a report with his evaluation, which is being submitted with his direct testimony.

Q; Have you reviewed the report and the recommendations of the report, including the estimated costs of the work to be done?

A: Yes, I have.

Q: What is your reaction to the report?

A: I was not surprised by the recommendations of the report. The cost was a little higher than I anticipated, but I am confident that the Company could complete the work recommended provided that it can obtain the funding through PennVest and provided that the Commission approved rates that would enable the Company to make the PennVest debt payments and enable it to cover the costs of operations.

Q: What interactions have you had with PennVest regarding the improvements to the system?

A: We have been having communications with PennVest since late 2024 exploring the best ways to secure funding for these projects. We have evaluated securing a loan that would cover all of this work and have evaluated the option of breaking the work into phases of less than $500,000, which would spread out the needed rate increases as well as offer an easier and quicker route to funding. Much of the work can be segregated into individual related projects. We presently are favoring the phased approach to funding and project completion.

Q: What is your view of the Company's ability to furnish and maintain adequate, efficient, safe and reasonable services and facilities in the future?

A: I am convinced that the Company has the ability to furnish and maintain adequate, efficient, safe and reasonable services and facilities in the future. While I will acknowledge that the Company had a learning curve with the Commission's requirements and processes, I think the Company has significantly improved over time, and I have to believe the Company would compare favorably to similar small water utilities. I think the plan that we are developing to implement the recommendations is solid and executable. I have knowledge and experience in construction projects and would be able to oversee that process. And I have full faith in the Company's staff and its certified operator to ensure that the service and operation of the water system meets the Commission's standards.

Q: Have you made any attempt to sell the water system to a third party?

A: Yes.

Q: Can you explain those efforts?

A: Yes, in late 2021, prior to receiving the Certificate of Public Convenience, the Company approached the Conneaut Lake Joint Municipal Authority to discuss the possible sale of the water system to the Authority. The discussions involved advising the Authority about the system, its history and condition. At the time, the Company was willing to hand over the water system to the Authority with the Company managing the system and not being charged tap fees for sewer and water on its future development. Ultimately, the Authority indicated it was not interested in the water system.

The Company also had discussions early on with Aqua about the Company selling the water system to Aqua. The discussions were very brief as Aqua advised it was not interested in buying the water system. The Company also had recent discussions with Aqua regarding buying the water system, and again Aqua indicated it was not interested.

Q: In its Petition, I& E identified the following ten water companies as possible entities that could take over the system: Aqua Pennsylvania, Inc.; Municipal Authority of Conneaut Lake; Conneaut Lake Joint Municipal Authority; Meadville Area Water Authority; Vernon Township Water Authority; Jamestown Municipal Water and Sewer Authority; Greenville Water Authority; Reynolds Water Company; Linesville Municipal Water Authority; and Saegertown Water Department; other than Aqua and the Conneaut Lake Joint Municipal Authority, have you had any discussions with the remaining 8 companies about taking over the water system?

A: No.

Q: Have any of those companies approached you at all regarding your water system?

A: No.

Q: Has any company approached you about acquiring your water system?

A: No.

Q: Does this conclude your direct testimony?

A: Yes, it does. However, I reserve the right to file such additional testimony as may be necessary or appropriate.

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PA PUC, I&E v. Conneaut Lake Park Water Corporation, Inc.
Docket Nos. P-2024-3051855, I-2024-3051857
Direct Testimony of Todd Joseph on behalf of
Conneaut Lake Park Water Corporation, Inc.

VERIFICATION

I, Todd Joseph, President of Conneaut Lake Park Water Corporation, Inc., hereby state that the facts set forth in the foregoing Direct Testimony of Todd Joseph, are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Dated: 4/21/2026

Signed by:
Todd Joseph
D8A5A23F161C497...

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

PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

REBUTTAL TESTIMONY

OF

Jaclyn McCoy

ON BEHALF OF RESPONDENT

March 30, 2026

Q: Please state your name and business address for the record.

A: My name is Jaclyn McCoy and my business address is 12244 Reed Avenue, Conneaut Lake, PA 16316.

Q: Am I correct that you are the General Manager of the Conneaut Lake Park Water Corporation, Inc.?

A: Yes.

Q: What are your job responsibilities as General Manager of the Company?

A: I serve as the primary point of contact for customer inquiries regarding water service, leaks, and system concerns. I coordinate with contractors to schedule repairs and maintenance. I oversee billing operations, including invoice preparation, distribution and payment processing. I manage accounts receivable and ensure accurate recordkeeping of customer payments. I also maintain efficient communication between customers, contractors and internal operations.

Q: Please describe your educational and professional background.

A: I have a Master's degree in Kinesiology, and spent 17 years as a teacher. I have been working for Todd Joseph since he purchased the Park.

Q: On whose behalf are you presenting this testimony?

A: I am presenting this testimony on behalf of the Respondent.

Q: What is the purpose of your testimony?

A: The purpose of my testimony is to respond to portions of the testimony given in support of the OCA and the Bureau of I&E. I will refer to the Respondent as the Company throughout my testimony.

Q: There has been a claim that the Company has failed to comply with 52 Pa Code Section 65.3 regarding the recordkeeping of complaints. Do you agree with that claim?

A: No, I do not.

Q: Please explain.

A: As General Manager, I am the only person who receives complaints for the Company. As part of that obligation, it is my responsibility to keep a written record of service complaints. I do this by completing a written Customer Complaint Log form that was created for the Company. Since the settlement under the rate case, I have diligently completed this form tracking every complaint or question the Company has received.

Q: I want to show you a document marked as Respondent Exhibit E, What is this document?

A: This is the Customer Complaint form that I have completed.

Q: Is this all your handwriting on the document?

A: Yes, it is.

Q: Does this form contain the name and date of the person complaining?

A: Yes.

Q: Does this form contain the address of the person complaining?

A: Yes.

Q: Does this form contain the date and character of the complaint?

A: Yes.

Q: Does this form contain the final disposition of the complaint?

A: Yes.

Q: Does the Code require that you include the date the complaint was resolved?

A: No, it does not, but the form does include a date column which I often complete.

Q: Does your form include more issues than service complaints?

A: Yes.

Q: Can you give me an example?

A: If you look at the third page, the entry for Ed Greiser, I actually called him to let him know that he had a leak in his lateral. So that was not really a service complaint made by him to the Company.

Q: Is the company able to fully resolve all of the complaints?

A: No, some of the complaints involve a passing problem that goes away by the time we try to investigate.

Q: The OCA complains that you do not provide enough detailed information on the complaint log, do you agree?

A: No, I put the information on the form that is required by the regulation. I certainly can add more information if needed, but I do not think how I currently fill out this form is inconsistent with what is required by the regulation.

Q: OCA next asserts that the Company failed to provide a dedicated phone number for the Company, is that accurate?

A: No, that is not accurate. The number that is given on all of our bills for customers to use is a cell phone number attached to a cell phone that I basically carry with me at all times. The requirement of the settlement was that the company was to create a phone number for the water company only that customers can call. That is what this phone number is. The references to the Tiki Bar and Hotel are based on outdated information. Ms. Jaquay is

correct that this number is a cell number and that I carry the cell phone, but she is not correct that it is not dedicated to the Company.

Q: OCA next asserts that the Company is not compliant with the settlement requirements that the Company have a website or accessible virtual location to view water company documents (i.e. tariffs, reports), do you agree with that claim?

A: No, the Company uses its Facebook page as an "accessible virtual location." It identified its use of the Facebook page in its certification to the rate case parties, including the OCA, and no party objected to the use of the Facebook page as opposed to a specific website. I regularly update the Facebook page with notices and other information relating to the water system. There are currently 80 members of the Company's Facebook page. OCA is correct that the Facebook page is private and is reserved for customers only. OCA has not been allowed into the Facebook page as it is not a customer. While the Company is not opposed to establishing a website based on the experience of its customers, it does not believe its use of its Facebook page violated the settlement agreement. Again, as admitted by the OCA in its testimony, "There is no specific requirement in the Public Utility Code or regulations to have a publicly accessible website".

Q: OCA next asserts that the Company failed to have a certified operator at its annual meeting with customers. Can you explain?

A: It is correct that a certified operator was not at the August 2024 and August 2025 meetings, but once we realized our error, we made sure the certified operator was present for the follow-up meeting held in September 2025. It was simply an oversight on my part.

Q: OCA points out to the number of complaints identified on the customer complaint log and relies on that to assert that the Company is not providing adequate, efficient, safe and reasonable service. Do you agree with that evaluation?

A: No, I do not. To try to claim that 33% of the customer base complains about service is misleading. Most of the complaints (i.e. low pressure, no water or leaks) center around water line breaks that occur in the water system or in the customer's laterals. Until the improvements are made to the system that the Company's engineer recommends, we will continue to have occasional issues with the system impacting service. I actually do not think that there are a lot of complaints. When a complaint does come in it's because there is a water leak and all those affected are letting me know that it needs fixed. Once we get it fixed the complaints stop. They aren't complaining necessarily just making us aware that something is wrong. Any other calls I receive are just someone needing help with their bill or a general question.

Q: OCA also points to the testimony of various customers that were provided through written complaints, how would you respond to those customers?

A: In my opinion, the customers who are complaining the most had a tiff/misunderstanding/incident/disagreement whatever you would like to call it about something unrelated to the water system. Many seem angry at Todd because he didn't restore the park the way they wanted, or because he tore down the roller coaster and removed the midway. Todd removed the former hotel manager and changed the way the hotel is being run and some don't like those changes. Todd's changes to the park seems to be where their anger stems from. So, it seems like this is their way of retaliation. The sewer authority significantly raised their rates around the same time and this group of

people didn't take the sewer authority to court. Why didn't they fight that, why are they only fighting him? At the public hearing, they testified about a bathtub of yellow water that was enough to make the customer scream, but it was not enough to cause them to call me about it. Same with the customer who compared water from the lake versus water from the water system; again I received no complaint and no photo showing the comparison.

Q: Does this conclude your rebuttal testimony?

A: Yes, it does. However, I reserve the right to file such additional testimony as may be necessary or appropriate.

PA PUC, I&E v. Conneaut Lake Park Water Corporation, Inc.
Docket Nos. P-2024-3051855, I-2024-3051857
Rebuttal Testimony of Jaclyn McCoy on behalf of
Conneaut Lake Park Water Corporation, Inc.

VERIFICATION

I, Jaclyn McCoy, General Manager of Conneaut Lake Park Water Corporation, Inc., hereby state that the facts set forth in the foregoing Rebuttal Testimony of Jaclyn McCoy, are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Dated: 4/21/2026

Jaclyn McCoy, General Manager
Conneaut Lake Park Water Corporation, Inc.

PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

REBUTTAL TESTIMONY

OF

Todd Joseph

ON BEHALF OF RESPONDENT

March 30, 2026

Q: Please state your name and business address for the record.

A: My name is Todd Joseph and my business address is 11364 Konneyaut Trail Extension, Conneaut Lake, PA 16316.

Q: On whose behalf are you presenting this rebuttal testimony?

A: I am presenting this rebuttal testimony on behalf of the Respondent.

Q: What is the purpose of your testimony?

A: The purpose of my testimony is to respond to portions of the testimony given in support of the OCA and the Bureau of I&E. I will refer to the Respondent as the Company throughout my testimony.

Q: In her direct testimony, Ms. Wise questions how the Company can have no "bad debts" when it acknowledged that certain customers had not paid their repair bills. How do you respond to that?

A: Bad debt means a debt that is uncollectible. The Company has not determined that any past due invoices are uncollectible.

Q: In her direct testimony, Ms. Wise asserts that the Company responded in discovery that it has no accounts payable. Is that correct?

A: No, it is not correct. The discovery request posed to the Company was to produce 2025 accounts payable reports, to which the company responded that it does not produce such reports due to the few bills it has. OCA asked the same question as to 2023 and 2024, to which we responded: "The only accounts payable is the quarterly fee due to our operator and the monthly bills from the electric utility." As of the end of 2025, the amount of legal fees currently due and owing from the Company was around $36,000.

Q: In her direct testimony, Ms. Wise questions the lack of debt held by the Company, can you explain why the Company has no debt?

A: As indicated in my direct testimony, I acquired the former Conneaut Lake Park, which included the water system out of bankruptcy for a total cost of $1.2 million. I did not need to finance that purchase through any debt service attributable to the Company.

Q: Ms. Wise also criticizes the fact that you have had to personally fund the some of the expenses of the water system. How do you respond to that criticism?

A: Had the OCA not so strenuously opposed the Company's effort to increase rates, I would not be in the position to have to subsidize the water system. This water system had not been self-sustaining for decades before I took over the water system; yet the PUC parties apparently did nothing. Rates have not been increased in decades with the year-round customers paying $14.39 a month and seasonal customers paying $7.20 a month while the rest of the state is paying significantly higher water rates. Instead, the PUC parties enabled the prior owners to allow the system to significantly degrade and are now trying to lay the blame for that at my feet. The reality is that the alleged financial instability of this utility is in the hands of the Commission, the Bureau of I&E and the OCA. If the Company can obtain the rates needed to operate this system in the fashion in which they apparently want to see it operate, then they have to be willing to accept the kind of rate increases needed to accomplish that goal, which will simply put these customers in line with what people in the rest of the state pay.

At my home locally, Aqua is our water provider and I pay about $90 a month. I pay about the same per month for my residential property in the Philadelphia area, which is also served by Aqua. I also have rental properties in Philadelphia where the cost per month for

a multifamily dwelling is $300 a month for water. Even at the new rate of $38 a month approved for this system in 2024, the residential customer rates here are well below what I experience locally and across the state.

Q: Ms. Wise referenced some late paid electrical bills. How do you respond to that?

A: Ultimately the bills were paid in full. Since the OCA made an issue of it during the rate proceeding, I have made sure to pay the electric bills on a timely basis by placing the electric bills on automatic withdraw.

Q: Ms. Wise suggests that the Company's financial position hindered its ability to meet two PENNVEST funding deadlines, would you agree with that statement?

A: No, I do not agree with that. Her statement reflects a basic misunderstanding of the PENNVEST funding options. First of all, to characterize these deadlines as "critical" is misleading. PENNVEST has rolling deadlines throughout the year for its Traditional Construction Funding Program, which is its primary funding mechanism. After evaluating the timing of getting such funding in light of some criticism regarding of the length of time it would take to get such funding, the Company consciously shifted approaches with the idea of getting funding quicker so that it could begin making improvements quicker. As recognized by Ms. Wise, the PENNVEST Small Project Program provides a more streamlined funding process where approvals for qualified small projects do not have to go through PENNVEST Board approval, but rather can be approved quickly by the staff. Given the nature of the improvements needed, the work can be completed through several distinct projects at a cost of less than $500,000 each. This will allow us to focus on the projects that do not need DEP Permits sooner while we go through the DEP permitting process for those aspects of the improvements that need permitting. In my view, this is

being fiscally responsible as well as ensuring that we can provide adequate, reliable water service.

Q: Ms. Wise asserts that relying on your continued funding is not a sustainable financial approach for a utility, do you agree?

A: I do agree; however, Ms. Wise seems to be suggesting that is intentional on our part. It is not intentional and we fully intend to rectify the financial shortfalls as soon as we are allowed to file for a rate increase.

Q: Ms. Wise points out that the Company has not filed its annual reports for 2023, 2024 and 2025. What is your response to that?

A: She is correct that we were late in filing the annual reports for 2023 and 2024, but they have been filed now. The 2025 report is not due until the end of April 2026, and it will be filed on time.

Q: Ms. Wise asserts there is no basis for the Company to suggest that any capital improvements would be covered by the customers at a 75% level. How do you respond to that?

A: First, that is not what was said. The Company's position is that any capital improvements likely would be covered by the residential customers at a 75% level. That approximation is based on how the residential and commercial customers funding responsibilities were split during the rate case for rate setting. I do not believe that is a misleading statement.

Q: Ms. Wise criticizes the Company for not timely notifying its customers that the certified water operator changed. What is your response to that?

A: First, I am not aware of any PUC regulation that requires the company to advise of personnel changes, even if it is the certified operator. Second, to be clear, it was the

ownership of the company that we use to operate the system that has changed. In fact, the person who has been serving as the primary certified operator has not changed.

Q: Over the last couple of years, there have been several customers complaining about the quality of the water from the water system, are you aware of those complaints?

A: Yes.

Q: First, can you give some background on the issues you have been dealing with some of these customers?

A: Yes, there are a handful of customers who are very upset with what I have done to the park since I acquired the park out of bankruptcy. They have opposed various development plans for which I needed Township approval. They have posted bad reviews regarding the hotel. They have filed frivolous complaints before the Commission. Many of these parties that complain are seasonal residents who mostly come up on weekends to their second house during the summer months and maybe on holidays, such as Ms. Jaquay, Ms. Eiler, Ms. Claypoole and Mr. Greiser. Ms. Anderson who testified at the public hearing assaulted my wife and we had to get a restraining order. Ms. Claypoole has filed a formal complaint before the Commission over the cap to the turnoff valve for her water despite admitting at the public hearing that she does not know who removed it, and which has been returned in place for months now. Ms. Claypoole has repeatedly called the police on me multiple times without basis. Mr. Greiser filed a formal complaint against the Company because the Company refused to turn his water back on after he refused to fix his lateral that leaked hundreds of thousands of gallons of water forcing the Company to shut off his water; the Commission ruled in the Company's favor. Ms. Eiler has called OSHA and the Township

on me multiple times without basis. Ms. Hartung built a pool onto my property, which is a trespass, and has refused to move it upon request.

Q: Am I correct that you operate businesses on the water system that is separate and apart from the water system?

A: Yes.

Q: And that is a hotel and a campground, correct?

A: Yes. I also operate a real estate development company and a full service real estate brokerage.

Q: How many rooms are in the hotel for overnight guests?

A: The hotel has 65 rooms and is solely used as a wedding and event venue.

Q: How many spaces are there in the campground for campers and do they each have water hook-ups?

A: The campground currently has 140 seasonal water hookups.

Q: Can you tell me how many complaints you receive at the hotel and campground about the quality of the water?

A: We have not received any complaints about the quality of the water.

Q: How many complaints do you receive about water pressure?

A: We also have not received any complaints about the water pressure.

Q: Does this conclude your rebuttal testimony?

A: Yes, it does. However, I reserve the right to file such additional testimony as may be necessary or appropriate.

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PA PUC, I&E v. Conneaut Lake Park Water Corporation, Inc.
Docket Nos. P-2024-3051855, I-2024-3051857
Rebuttal Testimony of Todd Joseph on behalf of
Conneaut Lake Park Water Corporation, Inc.

VERIFICATION

I, Todd Joseph, President of Conneaut Lake Park Water Corporation, Inc., hereby state that the facts set forth in the foregoing Rebuttal Testimony of Todd Joseph, are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Dated: 4/21/2026

Signed by:
Todd Joseph
D8A5A23F181C497...

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

PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

REBUTTAL TESTIMONY

OF

Matthew Elchert, B.S. MBA

ON BEHALF OF RESPONDENT

March 30, 2026

Q: Please state your name for the record.

A: My name is Matthew Elchert.

Q: Where do you work?

A: I am the owner of Keystone Water Systems, LLC.

Q: What kind of work does Keystone Water Systems, LLC do?

A: Keystone Water Systems is a company is a full service water systems company, including operating public water/wastewater systems.

Q: What is you professional and educational background and experience?

A: I have a B.S. Degree in Chemical Engineering and an MBA from Marshall University. I worked for OxyChem for five years as a chemical process engineer and then worked at Bayer Material Science for fifteen years. I have been the owner of Chatfield Drilling Inc. for the past eight years. Chatfield has twenty-two employees and performs geotechnical, environmental and water well drilling. Chatfield is licensed in Ohio, Pennsylvania, West Virginia and New York. I am an NGWA Certified well driller and a certified pump installer. I am currently an operator in training for both water and wastewater systems.

Q: On whose behalf are you testifying?

A: Conneaut Lake Water Corporation.

Q: What is the purpose of your testimony?

A: The purpose of my testimony is to respond to the claims identified by the OCA and the Bureau of I&E regarding violations at the Conneaut Lake Park Water Corporation water system.

Q: As the owner of Keystone, are you familiar with the report prepared by Steve Halmi regarding the evaluation of the system?

A: Yes.

Q: As the owner of Keystone, are you familiar with the operations of the Conneaut Lake Park Water Corporation water system?

A: Yes.

Q: Based on your knowledge of the condition of the Company's water system, do you agree with the recommendations made by Mr. Halmi?

A: Yes.

Q: Have you familiarized yourself with the Notice of Violation issued by the Department to the Company relating to its water system?

A: Yes.

Q: Are you able to address the issues raised by the parties in this litigation relating to that Notice of Violation?

A: Yes.

Q: First, am I correct that there are a number of alleged violations in the Notice of Violation that fall under 25 Pa. Code Subchapter F?

A: Yes

Q: And those are the alleged violations that start with 109.6 hundred, correct?

A: Yes.

Q: What is important to note about Subchapter F

A: The heading for Subchapter F is "Design and Construction Standards".

Q: Why is that important?

A: That is important because these only apply when you are designing and constructing a water system. They do not technically apply retroactively to force each system to be

updated to meet a new standards. In fact, Section 109.601 states specifically, "Standards in this subchapter apply to design and construction of public water systems and system modifications, regardless of whether a Department permit or permit amendment is required. The standards apply to new facilities and facility modifications unless otherwise specifically indicated." The water system here is not a new facility nor has it been modified.

Q: Let's go through each of the claims highlighted by the OCA and the Bureau of I&E, starting with the claim that the chemical storage tanks do not have secondary containment sufficient to hold 100% of the largest tank to prevent accidental discharge in the event of a spill or overflow. What is the status of that claim?

A: This issue was addressed by placing the containers that hold the treatment chemicals into a secondary containment structure.

Q: So, even though you were not required to make this modification, why was that done?

A: To the extent a change can be made that is simply to accomplish, it makes sense to do it.

Q: So, the Company was going above and beyond what was required?

A: Yes.

Q: Next, there was a claim that external ladders and/or tank hatches are not locked, which does not meet the design standards set forth in the Public Water Supply Manual. What is the status of this claim?

A: The section identified by the Department relates to the design of a system and requires that systems be designed to provide an adequate and reliable quantity and quality of water to the public. The Public Water Supply Manual is identified as containing standards that meet that requirement. This section and the Public Water Supply Manual only apply to

structures that are being designed. They do not apply retroactively to structures designed long before these standards came into effect. The water tank at the Company long pre-dates when these requirements applied, and do not retroactively apply to it. In any event, I believe this issue will be addressed when the improvements are made to the water tank.

Q: Next, there is a claim that the chemical feed pump plastic tubing is not as short as possible and/or is not sloped to permit draining. What is the status of that claim?

A: This issue was addressed by removing the existing plastic tubing and replacing it with a shorter length plastic tube, which resolved the issue the inspector had with the tubing.

Q: Next, there is a claim that appropriate backflow prevention devices are not installed, maintained and/or tested on all cross connections within the treatment plant, which related to the presence of a bypass between the raw and finished water that was valved off. What is the status of this claim?

A: Again, this falls into the category of issues that do not apply to this facility given its age. When the planned upgrades are carried out, this issue will be addressed.

Q: Next, there is a claim that the required performance monitoring samples are not collected as specified in the regulations. What is the status of this claim?

A: Field sampling previously used an Ascel test kit, which the prior KWS operator discontinued and did not restart. However, the sensitivity of this device and a similar Hach field test do not allow for meaningful process control (because the sample resolution and accuracy are insufficient). The set-up to sufficiently measure arsenic for process control includes a Hach DR1900 ($6000), a heater ($1800), and distillation glassware ($1100). I am recommending that this equipment be included in the system improvements.

Q: Next, there is a claim that the distribution system samples are not collected in accordance with monitoring plans. What is the status of that claim?

A: This claim relates to disinfection byproduct sampling location on the distribution system that was being collected at the hotel at location 701 as opposed to location 802. The 701 location was consistent with what was shown in the Department's DWRS system, but was different than the 802 location in the written plan. Given that that the sample was taken from the location 701 that was identified in the Department approved DWRS system, the sample was taken from the correct location. The plan has been modified to correct the inconsistency with the DWRS system information.

Q: Next, there is a claim that the chemicals, treatment equipment, size of chemical pump and/or injection point locations being used for the treatment are not the same as those specified in the water system permit. This relates to the use of sodium silicate to treat the water in the system. What is the status of this claim?

A: The addition of sodium silicate was previously permitted under the prior owner. When the Company requested a transfer of the permit from the prior owner to it, the sodium silicate provision was omitted. There was no notice or discussion from the Department ahead of time explaining as to why that provision was dropped or that it was going to be dropped. It is the Company's position that sodium silicate is necessary for this system due to the age of the piping because it acts as a corrosion inhibitor forming a protective film on pipes to prevent rust and lead/copper leaching. The addition of sodium silicate is actually enhancing the safety of the system. The addition of sodium silicate will be evaluated during the system improvement project, and either stopped or a permit amendment will be sought.

Q: Next, there is a claim that the exterior coating of the storage tank is peeled, cracked, rusted, covered in vegetation or in need of cleaning. What is the status of this claim?

A: The section identified by the Department does not specifically address a water tank, but rather simply imposes a general standard to "effectively … maintain public water system facilities." The vegetation has been removed, and it is my understanding that the tank will be addressed as part of the improvements recommended by the engineer.

Q: Next, there is a claim that the water system has not inspected the interior of the storage tank within the last five years. AWWA Standard M42 recommends that storage tanks are cleaned and inspected no less than once every five years. What is the status of that claim?

A: Again, the Department cites a section that does not address water tanks but simply requires that the owner "effectively … maintain public water system facilities." The AWWA provision is simply a recommendation and not a requirement. In any event, there has been an inspection of the water tank as indicated by the Company engineer.

Q: Next, there is a claim that the water system does not have a Stage 2 DBPR Compliance 1 Monitoring Plan that contains all required elements, specifically, the Department asserts the Company did not have an appropriate sampling site. What is the status of this claim?

A: This relates back to the distribution sample being taken at the Hotel at location 701 rather than at location 802. As discussed above, this has been corrected.

Q: Next, there is a claim that the water system does not have a Lead and Copper Rule 3 Sample Siting Plan that contains all required elements; specifically that is did not have a complete materials survey or plan. What is the status of this claim?

A: This plan has been updated to reflect the 2025 sampling that was performed. Most of the sampling locations from 2022 were demolished or inaccessible, so the sampling locations had to be updated.

Q: Next, there is a claim that the water system does not review the Comprehensive Monitoring Plan annually and update it as necessary. Specifically, at the time of the inspection, the Company has been using only Well 1 for the system water and the plan needs to be updated to reflect that. What is the status of this claim?

A: Given that the Wells will be evaluated and addressed in the improvement plan, it has been determined that updating the plan based on the current temporary operation does not make sense and the plan will be updated once the improvements are made. We expect those improvements to be made this year.

Q: Next, there is a claim that the water system does not have a detailed map of the water system that contains all of the required elements. What is the status of this claim?

A: It is my understanding that all water system mapping was lost during a fire that occurred long before the Company became the owner of the system. Since that time, we have used a map produced by the prior owner for a proposed improvement to the distribution system. As part of the proposed improvements, a more detailed system map will be produced.

Q: Now, one of the standards that the Bureau of I&E must meet is that there cannot be violations of statutory and regulatory standards that affect the safety, adequacy, efficiency or reasonableness of the service provided by the Company. In your opinion, do the violations identified by the parties rise to the level of affecting the safety, adequacy, efficiency or reasonableness of the service provided by the Company?

A: No, they do not. As indicated in my testimony, a number of the identified violations are not actually violations. In addition, a number of them have been corrected, and the ones that have not been corrected are under a plan to be corrected. Lastly, the one relating to the addition of the sodium silicate is actually improving the water system. In my opinion, these issues do not rise to the level of affecting the safety, adequacy, efficiency or reasonableness of the service provided by the Company to justify forcing the sale of the Company to Aqua.

Q: You were are the public hearings on this matter, correct?

A: Yes.

Q: And you heard the various complaints about the quality of the water, correct?

A: Yes.

Q: How does that testimony compare to the actual testing performed on the system water?

A: The tests conducted on the water system reflect a system that produces consistent pressures, and produces water that is consistently below the applicable water quality standards.

Q: I want to show you a document marked as Exhibit F. What is this document?

A: This is a summary of the CCR reports for the water system from 2020 through 2024.

Q: What is the CCR Report?

A: It is a report the Company is required to complete for the Pennsylvania Department of Environmental Protection providing data from the compliance sampling performed on the water system during the year. The report identifies whether there have been any violations of the applicable water quality standards by the Company during that year.

Q: And, is your company responsible for completing these reports for the water system?

A: Yes.

Q: And is your company responsible for taking all of the samples reports in this report?

A: Yes.

Q: And this is a summary of the results contained in those reports prepared under your direction?

A: Yes.

Q: What do the five years of reports show in terms of compliance with the applicable water quality standards?

A: These reports show that the water system was in full compliance with the water quality standards.

Q: I want to show you a document marked as Exhibit G. What is this document?

A: This is a summary of the water pressures as measured based on water tank levels for the water system for the years 2024 through April 2025.

Q: And were these taken on regular basis by your company during this time period?

A: Yes.

Q: What do the readings tell you about the water pressure for the system.

A: That the water pressures as measured are pretty consistent and are in the mid to upper 40 psig range during the entire period.

Q: Does this pressure range meet or exceed the minimum pressures required to be met by the Company?

A: Yes.

Q: Based on this, do you think there is a water pressure issue with the system?

A: Under normal operations, the system's water pressure satisfies the pressure requirements of the Commission.

Q: I want to show you a document marked as Exhibit H. What is this document?

A: This document is a summary of some of the data taken from our daily logs that are filled out by our company for the years 2023 through 2025.

Q: What information is included on these daily logs?

A: The daily logs, which hare filled out by our operator as part of the normal course of business include the time, a meter reading, the water flow since the last meter reading in gallons, the free Cl2; the pump hours, the CL2 level, the iron level and the initial of the operator who completed the log. The report also shows weekly iron levels and weekly residual chlorine levels at various sampling locations within the system.

Q: What does the summary show?

A: The summary shows the chlorine level results from samples taken from the entry point and at various sampling locations in the water distribution system.

Q: Why did you focus on the chlorine levels?

A: I am responding to the complaints about there being chlorine smell in the water at times. And while the water can at times have a chlorine smell, none of the measured levels exceed the applicable water quality standard for chlorine. In fact, the Company is required to inject chlorine into the system as a disinfectant to ensure the safety of the water.

Q: There has been some discussion of there being a recent arsenic exceedance, can you explain what happened?

A: The water quality standard for Arsenic for the water system is 10 ppb. We are required to test for arsenic on a quarterly basis. In the last quarter, our arsenic sample came back at 12

ppb. A retest was also above that level. Because we report these results to the Pennsylvania Department of Environmental Protection, it triggered a violation of the Department's computer system, which led the Company to issue the required notice to customers. However, because this limit is based on quarterly test results, it is not a violation unless the rolling average of the quarterly samples exceed the 10 ppb. So, while that test exceeded the standard, it is not a violation until the rolling average exceeds the standard, which has not yet occurred.

We have investigated the possible cause of the exceedance, and we discovered that the pump that injects iron chloride into the system, which assists in reducing arsenic levels, was malfunctioning. We have since replaced that pump. We also have increased the frequency of backwashing the system's filters. We believe this addresses the issue, and are currently awaiting the results of a recent arsenic test.

Q: Have the opinions you have expressed in this direct testimony been to a reasonable degree of scientific certainty?

A: Yes, they have.

Q: Does this conclude your rebuttal testimony?

A: Yes, it does. However, I reserve the right to file such additional testimony as may be necessary or appropriate.

PA PUC, I&E v. Conneaut Lake Park Water Corporation, Inc.
Docket Nos. P-2024-3051855, I-2024-3051857
Rebuttal Testimony of Matthew Elchert, B.S. MBA on behalf of
Conneaut Lake Park Water Corporation, Inc.

VERIFICATION

I, Matthew Elchert, Owner of Keystone Water Systems, LLC. hereby state that the facts set forth in the foregoing Rebuttal Testimony of Matthew Elchert, B.S. MBA, are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Dated: 04/27/2026

M J Elchert

Matthew Elchert, B.S. MBA
Owner, Keystone Water Systems, LLC

PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

REBUTTAL TESTIMONY

OF

Steven R. Halmi, P.E.

ON BEHALF OF RESPONDENT

March 30, 2026

Q: Please state your name for the record.

A: My name is Steven Halmi.

Q: Am I correct that you also provided direct testimony?

A: Yes.

Q: What is the purpose of your rebuttal testimony?

A: The purpose of my rebuttal testimony is to respond to the statements made by the OCA witness regarding PENNVEST funding and the approach for the completing the recommended improvements.

Q: What is your experience with PENNVEST funding?

A: For five municipal water and wastewater infrastructure projects that received over $13 million in funding from PENNVEST, I was the lead author for their funding applications, served as project engineer, and processed requests for payment.

Q: The OCA in its direct written testimony asserted that the Company missed PENNVEST application deadlines dated October 29, 2025 and February 4, 2026 and identified those as "critical deadlines" and "missed opportunities", do you agree with that assessment?

A: No.

Q: Why do you not agree with that assessment?

A: Those deadlines are related to the timing of submitting applications under the Traditional Construction Funding Program that go before the PENNVEST Board at their regular meetings for review and approval. The Board typically meets quarterly and there are quarterly application deadlines associated with PENNVEST's Traditional Construction Funding Program which are about 2 1/2 months before the meeting date. Alternatively,

the Company can submit an application for PENNVEST funding through PENNVEST's Small Project Program, which runs on a continuing rolling cycle so there are no firm deadlines that can be missed. Parties submit applications when they are ready to pursue funding. So, it is misleading to suggest that the Company has missed "critical deadlines" or "missed opportunities."

Q: The OCA in its testimony is critical of the Company looking towards the Small Project Funding Program as its funding source for the water system improvements, do you agree with that criticism?

A: No.

Q: Why do you think the Small Project Funding Program is a good option for the Company?

A: The improvements identified in my report fall into distinct categories that fit well into the funding limits of the Small Project Funding Program which is a cap of $500,000 for total projects that cost less than $1,000,000. For example, the improvements to the wells, the treatment system and the treatment building could be easily grouped and accomplished as one project for an amount less than $500,000. These tasks do not require a permit from the Department of Environmental Protection. Consequently, once we are able to put together a Small Project Funding Program application covering a project, we would submit the application and get a decision from PENNVEST without having to meet an application cut-off date or waiting for a board meeting. The key to the Small Project Funding Program is that there are no application deadlines and the approval process does not need to go through a PENNVEST Board meeting. The PENNVEST staff have the authority to make the decisions on funding a small project. Small Project Funding approval can typically be

granted within a few weeks. The streamlined process makes it very attractive to the Company, and could enable it to accomplish some of these improvements this year.

Q: The OCA in its testimony is critical of the Small Project Funding Program because it does not include grants, principal forgiveness or extended-term bonds options, do you agree with that criticism?

A: No.

Q: Can you explain why you disagree with that criticism?

A: Under the Small Project Funding Program, while projects being funded under that program are not eligible for extended term bond purchases, grant awards, or principal forgiveness loans, if a project qualifies for consideration of either an extended term, a grant award, or a principal forgiveness loan, the small project applicant may qualify for an interest rate reduction or the applicant may choose to withdraw the application from the Small Project Program and submit the application for consideration under the traditional PENNVEST program. So, the applicant has the flexibility to change funding direction if it is determined that it would qualify for any of these financial benefits.

Q: The OCA in its testimony declared that it is not realistic for the Company to complete any capital improvements in the summer of 2026, do you agree with that assessment?

A: No.

Q: Can you explain why not?

A: Based on my findings in my report, there are a number of improvements that can be completed which do not need approval from the Department of Environmental Protection. Those improvements that require Department approval could be made part of a separate project to be completed later. The only delay I can envision is the delay caused by this

proceeding and by any attempts by I&E, OCA or the customers to oppose any rate increase needed to make loan payments to PENNVEST.

Q: Given the types of improvements needed, would you recommend applying for the regular PENNVEST funding to fund all of the projects at once?

A: Not necessarily. The improvements needed can readily be grouped into targeted projects that can be funded through individual Small Project Program funding. This would expedite certain improvements in comparison to seeking a single PENNVEST loan in the amount of $2 million or more. Although the OCA accuses the Company of deficient financial planning, I think the opposite is true. By grouping the projects in funding groupings of $500,000 or less spread out over a few years, the Company can complete the necessary improvements in a methodical order and spread out the impact of the cost of those projects over time to have a more gradual impact on the rates paid by the customers, and doesn't preclude the Company from qualifying for an extended term, grant award, or principal forgiveness and changing course as appropriate. Applying for a single PENNVEST Traditional Construction Funding Program funding package (as the OCA has suggested) would result in delays in getting started with the improvements and could result in a significant increase in rates over a much shorter time frame. Before the completion of my report, the Company had explored the idea of seeking the PENNVEST funding in one lump sum, but concluded that the delay in obtaining that funding did not make sense when we have improvements that could be made on an expedited basis that do not require approval by the Department of Environmental Protection.

Q: In its direct testimony, OCA is critical of the Company's effort to seek funding under the Small Project Funding Program due to the need for a clear project description

and due to the fact that the program operates on a reimbursement basis. Do you agree with that criticism?

A: No, I do not. Any funding program the Company pursues would need a clear project description. So, that is not unique to the Small Project Funding Program. In addition, my evaluation serves as the basis for creating a clear project description, which will not be difficult to prepare. Similarly, the reimbursement process is not unique to the Small Project Funding Program. Such reimbursement process exists for the Traditional Construction Loan Program as well as most other state funding programs. That is not a basis on which to forego applying to the Small Project Funding Program.

Q: In its testimony, the OCA cites statements made during the public hearings on this case, am I correct that you attended the in person public hearing and listened in on the telephonic public hearing?

A: Yes.

Q: Given you years of experience in dealing with small water systems, what was your perception of the tenor of the complaints that were being raised?

A: I heard testimony from a few customers who had minor complaints about water pressure and discoloration, but also from several other customers who testified that they had no problem with the water system. Therefore my impression was that those who complained were bringing up only minor issues with the water system, and perhaps they actually had a bigger personal vendetta against Mr. Joseph. From what I heard, it appears that the customer base as a whole is happy with the staff that has been hired by the Company to respond to customers questions and complaints. Small systems like this can offer a

personal touch which provides benefits and responsiveness that might not be matched by much larger water companies.

Q: Based on the nature of the complaints you heard, what are your thoughts about those complaints?

A: The reported water pressure problems likely are not chronic occurrences, but rather result when leaks develop that require emergency repair and emergency shutdown of much or all of the distribution system. Any observations of discolored water are likely due to a variety of possible reasons, including (a) there are many parts of the distribution system with dead ends that are not able to be flushed properly due to hydrants that can't open properly, or there are valves that are inoperable, which likely existed long before the Company acquired the system out of bankruptcy; (b) there are many seasonal residents who notice discoloration when they return from a long absence, and that discoloration may come from corrosion or sediment accumulation in their own service lines or their own house plumbing, and (c) because of the seasonal nature of the community, water flow patterns often change in the distribution mains which has the potential to dislodge accumulated sediments or cause slight but compliant variations in chlorine levels that would otherwise be unnoticed.

Q: Now, one of the requirements standards that the Bureau of I&E must prove is that the Company cannot reasonably be expected to furnish and maintain adequate, efficient, safe and reasonable service and facilities in the future. In your opinion, do you believe that the Company cannot reasonably be expected to furnish and maintain adequate, efficient, safe and reasonable service and facilities in the future?

A: No. Based on my review of the system, the Company has been providing adequate, efficient, safe and reasonable service, and based on my evaluation of the system, I believe

that the Company can be reasonably expected to furnish and maintain adequate, efficient, safe and reasonable water service and facilities in the future. It is my opinion that the improvements that are needed are readily achievable by the Company with funding assistance from PENNVEST and with the PUC allowing for adequate and appropriate rates to cover the cost of those improvements.

Q: Have the opinions you have expressed in this direct testimony been to a reasonable degree of engineering certainty.

A: Yes, they have.

Q: Does this conclude your rebuttal testimony?

A: Yes, it does. However, I reserve the right to file such additional testimony as may be necessary or appropriate.

PA PUC, I&E v. Conneaut Lake Park Water Corporation, Inc.
Docket Nos. P-2024-3051855, I-2024-3051857
Rebuttal Testimony of Steven R. Halmi, P.E. on behalf of
Conneaut Lake Park Water Corporation, Inc.

VERIFICATION

I, Steven R. Halmi, President and Principal Engineer of Deiss & Halmi Engineering, Inc., hereby state that the facts set forth in the foregoing Rebuttal Testimony of Steven R. Halmi, P. E., are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Dated: 4/21/2026

Steven R. Halmi, P.E.
President and Principal Engineer
Deiss & Halmi Engineering, Inc.

PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

REVISED SURREBUTTAL TESTIMONY

OF

Todd Joseph

ON BEHALF OF RESPONDENT

April 27, 2026

Q: Please state your name and business address for the record.

A: My name is Todd Joseph and my business address is 11364 Konneyaut Trail Extension, Conneaut Lake, PA 16316.

Q: On whose behalf are you presenting this surrebuttal testimony?

A: I am presenting this surrebuttal testimony on behalf of the Respondent.

Q: What is the purpose of your testimony?

A: The purpose of my testimony is to respond to portions of the testimony claiming that the Respondent does not have a plan moving forward. I will refer to the Respondent as the Company throughout my testimony.

Q: In her direct testimony, Ms. Wise criticizes you for not presenting a finalized improvement plan for the water system. Do you have a plan?

A: Yes. The plan is to make improvements over a multiphase approach. She tries to discount that plan but it is a plan. In fact, we submitted a rough plan to the parties in this case four months ago. Attached as Exhibit I is the Company's response to an interrogatory asking to describe the plan in detail, which was served on the parties on December 3, 2025. We have heard nothing in response to that plan. Since that time, we have obtain the required engineer's evaluation, identifying a variety of specific projects to be completed under a phased approach. Again, we have heard nothing from the parties offering their opinions on the work to be performed, the sequence of that work or the time of any work.

Q: What is the next step in your plan?

A: Given that the other parties have not timely responded, we are going to proceed with Phase 1 of improvement project. Phase 1 will include the following work identified in the engineer's report: (a) wells and well pumps work, (b) treatment system upgrades, and (c)

treatment building upgrades. I have authorized the engineer to put together an application for a small project PENNVEST loan to include the work I have identified, and we are proceeding to get quotes for the cost of the work. We expect these projects to cost $500,000 or less. We also are going to proceed with Phase 2 which will be the water storage tank work, some of which will require permitting from DEP.

Q: How do you intend to fund these phases?

A: Both projects will be funded through loans from the PENNVEST small project program. Once the loan application is approved, I am willing to provide the interim funding until the PENNVEST funding becomes available. I will need to get approval from the Commission on rate increases to cover the cost of these two projects.

Q: Do you have experience with obtaining funding from financial institutions?

A: Yes.

Q: What does that experience tell you about the Company's ability to obtain funding for the improvement projects?

A: Any financial lending institution whether private, public, or institutional needs to verify revenue to cover their respective loan. Based on the current rate structure, not one lender would lend money to the Company. Each lender required a rate increase to increase revenue to cover the debt service.

Q: Ms. Wise criticizes you for not having taken the necessary steps to obtain PENNVEST funding, do you agree with that criticism?

A: No. First, the settlement agreement requires that I approach PENNVEST before looking at private funding. Contrary to Ms. Wise's suggestion, we have gone through the pre-application process and had our planned consultation meeting on October 8, 2025 with

PENNVEST and DEP. At that time, we were looking at doing all of the work at one time under the construction loan program, but have since shifted to the small project option because it was a quicker process. The only step we have left is to actually submit the small project funding application, which my engineer is working on.

Q: As part of its petition, I&E identified 12 water companies who may have the ability to operate the Company, and you previously had contacted two of those: Aqua and the Conneaut Lake Joint Authority, correct?

A: Yes.

Q: Ms. Wise criticizes you for not approaching any of the others, correct?

A: Yes.

Q: Why did you not reach out to the other ten?

A: Well, none of the remaining ones were located close enough to the Company's service territory to make sense to reach out to them. I viewed it as a waste of time. That belief was verified as none of those ten indicated any interest in participating in this proceeding.

Q: Does this conclude your rebuttal testimony?

A: Yes, it does. However, I reserve the right to file such additional testimony as may be necessary or appropriate.

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PA PUC, I&E v. Conneaut Lake Park Water Corporation, Inc.
Docket Nos. P-2024-3051855, I-2024-3051857
Revised Surrebuttal Testimony of Todd Joseph on behalf of
Conneaut Lake Park Water Corporation, Inc.

VERIFICATION

I, Todd Joseph, President of Conneaut Lake Park Water Corporation, Inc., hereby state that the facts set forth in the foregoing Revised Surrebuttal Testimony of Todd Joseph, are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Dated: 4/27/2026

Signed by:
Todd Joseph
D8A5A23F161C497...

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

Deiss & Halmi Engineering, Inc.
ENVIRONMENTAL AND CIVIL ENGINEERING
105 Meadville Street, Edinboro PA 16412 Ph. 814.734.3640

Deiss & Halmi Engineering, Inc. provides consulting engineering services to municipalities, municipal authorities, industries, businesses, public agencies, and individuals. We specialize in the areas of environmental and civil engineering. Together with our predecessor, Richard A. Deiss & Associates, we have provided consulting engineering services since 1970. Our staff of five professionals works out of our office in downtown Edinboro. The firm's President and Principal Engineer is Steven R. Halmi, P.E. Lists of disciplines we cover, typical services we provide, and a partial client list are as follows:

DISCIPLINES

Wastewater collection, conveyance, & treatment
Water supply, treatment, and distribution
Stormwater management
Municipal planning and design
Stream encroachments & waterway management
Floodplain analysis and stream modeling
Site and land development
Utility Engineering
Roads, bridges, culverts and dams
Industrial waste treatment
Industrial and municipal site remediation
Solid waste management
Hazardous waste management
Air quality

SERVICES

Design and plans preparation
Feasibility studies
Technical consultation
Project management and coordination
Construction bidding and contract documents
Construction specifications
Land development plans
Stormwater Management Plans
Erosion and Sedimentation Control Plans
NPDES permit applications
Sewage system compliance assistance
Sewage facilities planning (Act 537 plans)
Domestic wastewater permit applications
Industrial wastewater permit applications
Small flow treatment facilities
On-lot disposal systems
Water system compliance assistance
Public water supply permit applications
Hydrologic and hydraulic modeling
Dam inspections
Landfill permit applications, inspections, and reporting
Mapping and topographic surveys
Drafting and technical drawing
Emergency response consultation
Preparedness, Prevention and Contingency (PPC) Plans
Spill Prevention, Control, and Countermeasure (SPCC) Plans
Grant application assistance
Expert testimony

EXHIBIT A

PARTIAL CLIENT LIST

Allegheny College
Associated Contractors, Inc.
Barnhart Transportation
Bethesda Lutheran Services
Bloomfield Township
Brokenstraw Township
Brokenstraw Valley Area Authority
Camp Lambec
Carmeuse
Channellock
Chivers Construction Co.
Borough of Cochranton
Commodore Perry School District
Conewango Township
Country Acres Mobile Home Park
Crawford Central School District
Crawford County Planning Commission
Cussewago Township
East Fallowfield Township
East Mead Township
Environmental Coordination Services & Recycling
Edinboro Borough
Edinboro Lake Watershed Association
Edinboro University
Erie Forge and Steel
French Creek Recreational Trails, Inc.
French Creek Township
General McLane School District
Glade Township
Glendorn Lodge
Greenleaf Corporation
Guys Mills Mutual Water Association
Hayfield Township
Hively Construction Co.
Hydro-Pac, Inc.
Imperial Point Water and Wastewater Company
Kinzua Warren County Joint Authority
Lake City Municipal Sewer Authority
Lindy Paving
Linesville Pine Joint Municipal Authority
Meadville Housing Corporation
Meadville Redi-Mix Concrete, Inc.
Mercer Forge Corporation
Moody and Associates, Inc.
Municipal Authority of Middleboro
NextEra Energy Transmission
Noble Environmental
Northwest Crawford County Sewer Authority
Oil Creek Township
Penncrest School District
Perseus House, Inc.
Pro Waste Services
Russell Standard Corporation
Rustler Services
Spectrum Control, Inc.
Titusville Dairy Products Company
Union City School District
Venango Borough
Washington Township
Washington Township Sewer and Water Authority
Waterford Township
Wattsburg Borough
Wesbury United Methodist Community
West Mead Township
YMCA Camp Fitch
Youngsville Borough

STEVEN R. HALMI, P.E.

President and Principal Engineer

Deiss & Halmi Engineering, Inc.
ENVIRONMENTAL AND CIVIL ENGINEERING

PROFESSIONAL REGISTRATION

Registered Professional Engineer, Pennsylvania, License No. PE055808E

EDUCATION

Pennsylvania State University, B.S. Degree in Civil and Environmental Engineering, 1994
Cornell University, M.S. Degree in Civil and Environmental Engineering, 1996

EXPERIENCE

Deiss & Halmi Engineering, Inc., Edinboro, Pennsylvania, 2005 to present
President and Principal Engineer for firm serving multiple municipalities, municipal authorities, businesses, industries, land developers, and individuals in western Pennsylvania. Service areas include municipal planning and engineering, water treatment and distribution, wastewater collection and treatment, land development, stormwater management, erosion and sedimentation controls, solid waste management, industrial waste treatment, air quality, and other environmental services.

Richard A. Deiss & Associates, Meadville, Pennsylvania, 1993, 1998 to 2004
Project Engineer for municipal planning and engineering, land development, waste management, industrial waste treatment, air quality, water treatment and distribution, wastewater collection and treatment, stormwater, and mining projects.

Post, Buckley, Schuh & Jernigan, Inc., Newport News, Virginia, 1997 to 1998
Engineer for road, bridge, channel, and drainage projects involving hydrologic and hydraulic modeling, floodplain studies, stormwater management, storm surge modeling, and scour potential for various projects in Virginia, South Carolina, Georgia, and Missouri.

Federal Highway Administration, Sterling, Virginia, 1991 to 1992
Engineering Student Trainee for the Eastern Federal Lands Highway Division. Designed right-of-way acquisitions, traffic signal timing, traffic control, drainage facilities, alignments, and interchange configurations, finalized highway plans, specifications, and estimates; and provided highway construction and compliance inspections for projects in Georgia, Maryland, Minnesota, Mississippi, Ohio, and Virginia.

PROFESSIONAL MEMBERSHIPS

Water Environment Federation
Western Pennsylvania Water Pollution Control Association
National Society of Professional Engineers
Pennsylvania Society of Professional Engineers
American Water Works Association

EXHIBIT B

STEVEN R. HALMI, P.E.
President and Principal Engineer

Deiss & Halmi Engineering, Inc.
ENVIRONMENTAL AND CIVIL ENGINEERING

STATEMENT OF EXPERIENCE WITH WATER SYSTEMS ENGINEERING

Deiss & Halmi Engineering, Inc. has provided civil and environmental engineering services for public and private water systems since 1970. A brief statement of work performed on water supply systems in the last five years is as follows:

Community Water Systems

- Brandon Acres Community: Designed and permitted raw water storage system and disinfection.
- Brady Hills Mobile Home Park: Permitting for storage tank refurbishing, manganese greensand filtration upgrades, and disinfection reconfiguration.
- Municipal Authority of the Borough of Conneaut Lake: Comprehensive evaluation of system capacity to handle growth; budget development; planning for new sources; evaluation of distribution system; service line inventory; storage tank evaluation and maintenance recommendations.
- Borough of Cochranton: Evaluation of options to improve disinfection; design of sequestering system for iron and manganese control.
- Country Acres Personal Care Home: Design and permitting for improved disinfection and softening.
- Country Estates Mobile Home Park: Evaluation of options for storage improvements.
- Country Gardens Mobile Home Park: Permitting for disinfection.
- Davis Estates Mobile Home Park: Evaluation of treatment system adequacy; documentation of system components.
- Denny Ridge Mobile Home Park: Consultation regarding compliance matters; service line inventory.
- Elderberry Mobile Home Park: Treatment system evaluation; design for upgraded disinfection system.
- Fountain House Mobile Home Village: Evaluation for merger of system entry points.
- Hickory Hill Mobile Home Park: Treatment system evaluation; development of options for source rehabilitation.
- Hydetown Court Mobile Home Village: Treatment system evaluation; design for upgraded disinfection system.
- Imperial Point Mobile Home Park: Analyze effectiveness of manganese greensand treatment for iron and manganese; permitting for pumping system improvements.
- Lake City Borough: Design upgrades for distribution pumping; distribution line replacements; comprehensive system mapping; chlorine contact system design and construction management.
- Meadville Housing Corporation: Miscellaneous consulting regarding system compliance and monitoring waivers.
- Palmer Shores Water Association: Design and construction management for complete distribution system replacement.
- Peaceful Acres Mobile Home Park: Treatment system evaluation; design for upgraded disinfection system.

EXHIBIT C

- Pinedale Mobile Home Park: Evaluation of treatment system; design for arsenic treatment system; service line inventory.
- Rocky Ridge Mobile Home Park: Permitting for storage tank refurbishing, disinfection reconfiguration.
- Sandy Hill Estates: Treatment system evaluation and permitting for disinfection upgrades.
- Springfield Mobile Home Park: Design and permitting for treatment system replacement including manganese greensand filtration for iron and manganese and disinfection.
- Sunnydale Subdivision: Redesign of chlorination system for compliance with 4-log treatment requirements.
- Washington Township: Engineering reviews for distribution system extensions; development of intermunicipal water agreements; permit renewal and annual reporting for water allocation permit.
- Waterford Township: Design and construction management for intermunicipal system connection.
- Youngsville Borough: Evaluation of storage tank repair and upgrade alternatives.

Non-transient Noncommunity Water Systems

- Commodore Perry School District: Treatment system evaluation; design and permitting for system softening.
- Penncrest School District: Treatment and distribution system evaluation; design and permitting for chlorine contact reconfiguration.
- Warren County School District: Design and permitting for upgrades to manganese greensand filtration system for manganese treatment and disinfection.

Transient Noncommunity Water Systems

Various work performed for transient noncommunity water systems such as system evaluations, documentation of treatment process, design for disinfection, design for iron and manganese control, and permitting at sites including the following:

- Allegheny I-80 Campground
- Barnhart Transportation
- Camp Fitch
- Camp Lambec
- Dollar General Guys Mills
- YMCA Camp Sherwin
- Moraine State Park
- Edinboro Conference Grounds
- Glendorn Lodge
- Mercer-Grove City KOA Campground
- Mound Grove Golf Course
- Village Tavern

ENGINEERING EVALUATION REPORT

CONNEAUT LAKE PARK WATER SYSTEM

PWS ID # 6200018

SUMMIT AND SADSBURY TOWNSHIPS, CRAWFORD COUNTY

PREPARED BY:

STEVEN R. HALMI, P.E.

DEISS & HALMI ENGINEERING, INC.

EDINBORO, PENNSYLVANIA

FEBRUARY 24, 2026

EXHIBIT D

I. PURPOSE OF THIS REPORT

The purpose of this Engineering Evaluation Report is to review and document the physical infrastructure associated with the Conneaut Lake Park Water System ("System"), evaluate the capability of the System infrastructure to provide reliable water to customers in compliance with applicable rules and regulations, and recommend System infrastructure improvements as necessary to ensure continued reliability and compliance. This Report has been prepared on behalf of Conneaut Lake Park Water Corporation, Inc. This Report has been prepared by Steven R. Halmi, P.E., a licensed professional engineer with 30 years experience in engineering associated with public and private water supply systems.

This Report does not specifically evaluate the adequacy of the System for fire protection. Nor does this Report endeavor to estimate demand from future development projects or the System's capacity for such future demand.

II. SYSTEM DESCRIPTION

The Conneaut Lake Park Water Corporation, Inc. ("CLPWC") operates the Conneaut Lake Park Water System, which provides water service to approximately 154 customers, most of which are full-time and seasonal residences, a few of which are businesses, in and around Conneaut Lake Park in Summit and Sadsbury Townships, Crawford County. The System is permitted and regulated by the Pennsylvania Department of Environmental Protection ("PaDEP") as a Community Water System, per PaDEP Regulations at 25 Pa. Code Chapter 109. The System consists of two groundwater source wells, a treatment plant, an elevated storage tank, and distribution piping. A location map is attached as Exhibit 1, which also outlines the approximate area served by the System.

III. SYSTEM HISTORY

The System has been serving the Conneaut Lake Park area for many decades. The last major upgrade took place in 2009 when a groundwater treatment system for arsenic and iron removal was constructed. The System at that time was overseen by the Conneaut Lake Park Board of Trustees. As part of a bankruptcy proceeding, the Trustees sold their assets to Keldon Holdings LLC in 2021, which in turn placed the system assets into CLPWC. The stock of CLPWC is held by CLP Water Park LLC, whose sole member is Todd Joseph. The System currently contracts with Keystone Water Systems, Inc. for the operation of the System under the supervision of a PaDEP certified water system operator. The most recent Pennsylvania Department of Environmental Protection (PaDEP) Public Water Supply Permit issued to the System was Operation Permit No. 2009505-T1 issued to CLPWC on August 6, 2021, which consolidated all Public Water Supply permits previously issued to the System and transferred the permit to CLPWC.

IV. SYSTEM PERFORMANCE

The System has for the most part provided reliable service with sufficient water quantity and quality. The exceptions have been when distribution piping leaks or service line leaks have occurred that have required portions of the distribution system to be shut down for repairs. The quantity of water available has otherwise been reliable. There have been no recent issues with the wells or treatment system needing to be shut down for extended periods.

The wells are permitted to have a combined safe yield of 300 gallons per minute. The filtration system capacity is permitted to be 200 gallons per minute. The instantaneous maximum flow through the chlorine contact segment is permitted to be 180 gallons per minute. The smallest of these numbers is the overall permitted capacity of the system: 180 gallons per minute, which is equivalent to 259,200 gallons per day. However, the system in 2025 ran at an average of 119 gallons per minute, or 171,360 gallons per day. This is well in excess of system demand, which over calendar year 2025 averaged 18,783 gallons per day. The month of maximum usage in 2025 was February, during which the demand averaged 26,396 gallons per day, presumably due

to many customer faucets being intentionally left on to avoid freezing. Maximum day demand in 2025 was about 40,000 gallons per day, although there were a few occasions of higher daily well pumping after the treatment system had been shut down for a day or more and the storage tank was refilled.

Water quality has consistently met federal and state standards, with only one recent exception. That exception was that arsenic exceeded the maximum contaminant level (MCL) of 10 parts per billion (ppb) in samples taken on September 3, 2025 (15 ppb) and September 29, 2025 (12 ppb). Operational adjustments were made to the arsenic treatment process, and subsequent samples for arsenic have been at or below the MCL. A summary of all routine federal and state monitoring requirements for this System is below.

Parameter	Last sample date	When next sample is required to occur	Have there been any recent MCL exceedance or substandard result?
Distribution system coliform bacteria	12/2025	Monthly	No
Distribution system chlorine residual	12/2025	Monthly	No
Entry point free chlorine	Daily	Daily	No
Nitrate and nitrite	9/2025	Annually	No
Arsenic	10/2025	Quarterly	Yes
Asbestos	12/2022	1/2029 to 12/2031	No
Inorganic chemicals (IOCs other than arsenic and asbestos)	12/2024	1/2027 to 12/2027	No
Volatile organic chemicals (VOCs)	9/2025	9/2026 to 12/2026	No
Disinfection byproducts (HAA5 and TTHM)	8/2024	8/2027	No
Synthetic organic chemicals (SOCs)	6/2024	4/2027 to 6/2027	No
Lead and copper	9/2025	6/2028 to 9/2028	No
Radionuclides	10/2025	1/2031 to 12/2031	No
PFAS	11/2025	1/2027 to 12/2027	No
Iron	3/2016	NA	No

V. SYSTEM COMPONENTS

The System consists of two groundwater source wells, a treatment plant with filtration and disinfection, an elevated storage tank, and distribution piping. A schematic drawing of the treatment plant is attached as Exhibit 2. A description of system components follows.

Wells and well pumps. There are two groundwater wells used by the System. Both are located within the treatment building located on the southeast corner of the intersection of Center Avenue and George Street in Summit Township. Well No. 1 was constructed in 1957 to a total depth of 45 feet, with the casing to 40 feet. Well No. 2, which is approximately 30 feet south of Well No. 1, was constructed in 1980 to a total depth of 70 feet, with the casing to 55 feet. The aquifer reportedly consists of unconsolidated sand and gravel alluvium. Both wells were reportedly evaluated in 1993 using the PaDEP Surface Water Identification Protocol (SWIP) and confirmed to be not under the influence of surface water, and as such the wells are regulated as groundwater sources. (Information in this paragraph was obtained from the PaDEP Drinking Water Reporting System.)

Well No. 1 and Well No. 2 are individually permitted with a combined safe yield of 300 gallons per minute. The 300 gallons per minute can come from either well or from a combination of the two as long as the flow does not exceed 300 gallons per minute total.

The Zone I wellhead protection area for both wells is presumed to be approximately 200 feet radius (assuming a screen/open borehole of less than 200 feet within unconsolidated sediments). The System does not own or substantially control the Zone I wellhead protection area, which is acceptable for sources constructed and permitted prior to 1995, but would not be acceptable if the wells were constructed today. Potential sources of contamination include small quantities of household products and fuels used at the nearby residential properties. There are no nearby nonresidential properties on which larger quantities of fuels, oils, or chemicals are stored. There is little risk of contamination from sewage, because all nearby properties are served by the Conneaut Lake Joint Municipal Authority public sewer system. There is also little risk of contamination from transportation accidents, because nearby streets are all residential used only

by local traffic; the closest highway is Pa. Route 618 which is approximately 600 feet to the west. Another potential source of contamination is from Conneaut Lake, particularly at the Pa. Fish and Boat Commission access area, where there is a boat launch about 300 feet northeast of the wells. However, a fuel or oil spill into the lake at the launch area would be unlikely to pose an immediate threat to the wells, because fuels and oils tend to float on the water surface, and it had previously been determined that the wells are not subject to surface water influence.

Each of the two wells has a line shaft vertical turbine pump. Pump and motor data is as follows:

	Well No. 1	Well No. 2
Pump make/model	Deming 4700	Deming 4700
Power	25 HP	25 HP
Speed	1800 RPM	1750 RPM
Impeller	(12) 8-inch bowls	(12) 8-inch bowls

Currently, Well No. 2 is only used, because Well No. 1 has a leaking seal, although Well No. 1 is believed to be operable. The average capacity of the Well No. 2 was 119 gallons per minute in 2025, based on records of total pump hours and total gallons pumped. The well pump used is selected by the operator. The well pump is turned on and off automatically based on the level of water in the elevated storage tank. A programmable logic controller (PLC) computer reads a signal from the storage tank level monitor, turning on the well pump when the level drops to a predetermined low level setpoint, and turning off the well pump when the level rises to a predetermined high level setpoint.

It is recommended that the wells and well pumps be evaluated and refurbished. Access may be difficult for removal of the well pumps, so improvements to the ceiling hatches above the wells may be necessary. Well No. 1 should be evaluated first while Well No. 2 remains in service. Before removing the Well No. 1 pump, it is recommended to run it thoroughly to waste, then collect raw water samples to confirm quality remains adequate and worthwhile for further evaluation. Assuming that Well No. 1 can be made operable and reliable, action items for each well should include the following:

1. Remove pump and motor. Confirm and record pertinent information such as length of shaft, number of bowls, intake setting, etc.
2. Send pump and motor to qualified shop for refurbishing and evaluation, including check/replace bearings, check/rewind motor, repair/replace seals.
3. After removing the pump, let the well settle. May want to use alum to help settle the well and improve clarity.
4. Conduct a down well camera inspection. Evaluate the condition of the casing, screen, formation, etc. Make a record of pertinent information.
5. Conduct a thorough mechanical cleaning of the well, aided by phosphoric acid / biocide chemicals.
6. Install a transducer or other means for future drawdown evaluation.
7. Reinstall the pump and motor after refurbishment.
8. Evaluate the pump yield to determine specific capacity by measuring static and pumping drawdown levels.
9. Obtain a supply of spare parts for the pumps.

If refurbishment of the pump and/or motor for either well is not feasible or too costly, consideration should be made for replacing the pumps with new line shaft pumps or with new submersible pumps. Once both pumps are made fully operational, it is recommended that they be alternated in operation, or in another manner that ensures regular operation of both pumps, and in a manner that is consistent with a PaDEP approved comprehensive monitoring plan to ensure sampling is representative of both wells. Should one of the wells or well pumps malfunction in the future, the other can be used to supply the system while timely repairs are made to the malfunctioned well or well pump.

Based on the foregoing discussion of the work necessary for the wells and well pumps, an opinion of probable cost for recommended improvements for the wells and well pumps is attached hereto as Exhibit 6.

Treatment system. A filtration system for arsenic and iron was installed in 2009, because raw water arsenic was at a level around 0.026 mg/L, which exceeds the MCL of 0.010 mg/L. Raw water iron was also high, up to around 0.8 mg/L, which exceeds the secondary MCL of 0.3 mg/L. And raw water manganese was also high around 0.06 mg/L, which exceeds the secondary MCL of 0.05 mg/L. Arsenic, iron, and manganese are naturally occurring minerals present in many groundwater aquifers, and levels that exceed the MCL are not uncommon in northwestern Pennsylvania.

The filtration system consists of three parallel 54-inch diameter pressure vessels with GreensandPlus media. The media is believed to be original (installed in 2009), and is due for replacement, as the expected life of the media is about 10 to 15 years. A sodium hypochlorite chemical feed ahead of the filters keeps the manganese dioxide coated surface of the media continuously regenerated in an oxidizing state, which induces an oxidation reduction reaction of the arsenic, iron, and manganese in the raw water to forms which are able to be physically separated by the filter media. Arsenic requires some level of iron precipitates to adsorb onto, and therefore a separate ferric chloride chemical feed supplements the raw water iron in order to assure sufficient arsenic removal. The media filters are backwashed one at a time to remove accumulated solids including the precipitated iron, arsenic, and manganese. Backwash water discharges to two 4,000 gallon backwash holding tanks. Solids in the holding tanks settle fairly quickly to the bottom, and the remaining water can be recycled back through the filters. Accumulated solids from the tank bottom are periodically pumped out of the tank into the sanitary sewer system.

Valves attached to each filter tank open and close automatically, depending on whether the tank is in normal mode, backwash mode, or rinse mode. Service mode is a downward flow through the media, where filtered water flows out to the distribution system. Backwash mode is an upward flow through the media which expands and fluffs the media to remove solid particles, which are flushed out to the backwash holding tanks. Rinse mode occurs after backwashing, restarting downward flow through the media, but flushing to the backwash holding tank for a short time prior to restoring service mode. The opening and closing of the valves is controlled automatically by a programmable logic controller (PLC) computer with a touch screen interface.

The PLC operates the filtration system automatically between the modes of operation. Backwashing is initiated automatically, typically every 2 to 3 days, and typically for a duration of approximately 10 minutes. The timing and duration of the backwash and rinse cycles can be set by the operator as needed, and is typically set to alternate backwashing so that only one tank is backwashing at a time. There are separate flow meters for each filter tank which record the volume of water passing through each tank during each cycle.

The capacity of the filtration system was designed by the manufacturer to be 200 gallons per minute, and the PaDEP Operation Permit was issued for a capacity of 200 gallons per minute, which is 4.2 gallons per minute per square foot with all three filters online, or 6.3 gallons per minute per square foot with two filters online and the third in backwash mode. This is somewhat higher than the recommendation of the PaDEP Public Water Supply Manual of 3 gallons per minute per square foot, although it is not uncommon for PaDEP to issue a permit for a higher flow rate based on justification by the manufacturer. In 2025, the flow rate through the filters averaged 119 gallons per minute, which is 2.5 gallons per minute per square foot with all three filters online, or 3.7 gallons per minute per square foot with two filters online and the third offline for backwashing.

The aforementioned sodium hypochlorite chemical feed runs automatically. Whenever the PLC is calling for the well pump to run, it is also calling for the chemical feed pump to run. In that way, the sodium hypochlorite dosage remains constant. The sodium hypochlorite feed pump is a diaphragm metering pump, ProMinent Model GMXa 1009. The feed pump rate is adjustable, as is the concentration of the sodium hypochlorite solution. As discussed previously, sodium hypochlorite is necessary to keep the manganese dioxide coated surface of the media continuously regenerated in an oxidizing state. But the sodium hypochlorite dosage is also kept high enough to maintain the minimum required free chlorine residual of 1.0 mg/L at the system entry point (refer to disinfection discussion in this Report). The entry point free chlorine residual is monitored daily by the operator, and adjustments are made as necessary, although the residual level remains relatively steady. The sodium hypochlorite chemical feed pump is reported by the operator to not prime reliably.

The aforementioned ferric chloride chemical feed runs automatically. Whenever the PLC is calling for the well pump to run, it is also calling for the chemical feed pump to run. In that way, the ferric chloride dosage remains constant. The ferric chloride feed pump is a diaphragm metering pump, ProMinent Model GALA 1005. The feed pump rate is adjustable. As discussed previously, it is necessary supplement the raw water iron level for effective arsenic removal, to a pretreatment iron level of 1.5 to 2.0 mg/L. The pretreatment iron level is monitored daily by the operator, and adjustments are made as necessary. The ferric chloride chemical feed pump is reported by the operator to not prime reliably.

Flow through the filtration system is regulated by a valve upstream of the filters. The valve is a combination of flow and pressure reducing valve, manufactured by Cla-Val, Model 649-01. Its purpose is to reduce a higher inlet pressure to a steady lower downstream pressure, and to also limit flow to a preselected maximum rate. The average pumping rate in 2025 was recorded to be 119 gallons per minute, which is presumably throttled by this flow control valve. Backwash flow rate is also controlled by this flow control valve. The filter system is intended to have a backwash rate of approximately 190 gallons per minute (through one tank backwashing at a time); the rate through the flow control valve during backwashing should be confirmed to be capable of operating at approximately this rate and adjusted as necessary.

The backwash handling system consists of the two 4,000 gallon plastic backwash holding tanks, a backwash recycle pump (Grundfos vertical multistage centrifugal pump with one horsepower motor), a recycle water bag filter chamber (Filter Specialists, Inc. Model BFNP1263161502NPT) and filter bag (No. 2 at 7” x 32”). There are also a sludge pump and hose which are used to periodically pump accumulated solids out of the tanks into the sanitary sewer system.

There are many mechanical parts and electrical components to the filtration system, including manual valves, shutoff valves with electric actuators, pressure sensors, flow sensors, and the PLC computer and touchscreen. Although all parts are currently functioning well, it is recommended to have spare parts on hand for quick replacement in the event of trouble. This includes a spare, fully pre-programmed PLC that is ready to be swapped with the operating PLC in the event of a malfunction. It is not critical to have spare recycle or sludge pumps on hand,

because if these pumps malfunction, filtration and backwashing are still possible, because it is not necessary to recycle backwash through the filters, and in such situations, backwash water could be discharged to the sanitary sewer system.

Filtered water is also currently treated with a chemical feed of sodium silicate, which is injected immediately after the filters into the filtered water. Sodium silicate is used for sequestration of iron and manganese, rendering them ineffective at causing some undesirable aesthetic effects such as taste, odor, and staining. The need for sodium silicate for this purpose is dubious, because iron and manganese should be effectively removed by the manganese greensand filters. On the other hand, sodium silicate is sometimes used for general corrosion control, and the operator reports that the sodium silicate has been effective at reducing the frequency of leaks developing in the distribution system. In addition, sodium silicate is sometimes permitted by PaDEP as a corrosion inhibitor in systems that have exceeded lead or copper action levels, although corrosion control for lead or copper action level exceedances is not known to have ever been necessary at this system. The existing sodium silicate chemical feed runs automatically. Whenever the PLC is calling for the well pump to run, it is also calling for the chemical feed pump to run. In that way, the sodium silicate dosage remains constant. The sodium silicate feed pump is a peristaltic metering pump, Stenner Model 85MHP17. The feed pump rate is adjustable, as is the concentration of the sodium silicate solution. It is noted, however, that PaDEP Operation Permit No. 2009505-T1 issued August 6, 2021 revoked the option to feed sodium silicate "since any potential future need for corrosion control will have to be reevaluated." If the operator desires to continue feeding sodium silicate, this will need to be justified to PaDEP and a permit modification will need to be issued.

Recommendations for the treatment system include the following:

1. Replace the filter media in all three tanks.
2. Inspect the tank interiors, including interior coatings and distributor hubs and laterals. Make repairs as necessary.
3. Confirm proper function of flow control valve, in particular that it is adjustable to a rate up to 180 gallons per minute to match the permitted peak flow through the chlorine

contact segment (refer to discussion on disinfection) and that it is allowing for a filter backwash rate of approximately 190 gallons per minute.

4. Confirm proper function and complete shutoff of all manual and automatic valves. Repair or replace valves that are not fully functional.
5. Replace the ferric chloride chemical feed pump with a new, simpler unit that will prime properly.
6. Obtain a set of spare mechanical and electrical parts to be kept on hand.
7. Ready a spare, fully pre-programmed PLC and touchscreen for rapid replacement of the existing controller system in the event of malfunction of the existing controller.
8. Confirm need to continue sodium silicate treatment for corrosion control, and obtain modified PaDEP permit if determined to be necessary and justified.
9. Replace the sodium hypochlorite chemical feed pump with a new, simpler unit that will prime properly.

Based on the foregoing discussion of the work necessary for the treatment system, an opinion of probable cost for recommended improvements to the treatment system is attached hereto as Exhibit 6.

Disinfection. The System disinfects with chlorine, which is injected into the raw water as sodium hypochlorite. Prior to entering the distribution system, the chlorinated water passes through a chlorine contact segment consisting of an underground pipe 310 feet long and 20 inches in diameter (as noted by PaDEP with the issuance of Public Water Supply Operation Permit No. 2009505-T1 on August 6, 2021). This represents a chlorine contact capacity of approximately 5,060 gallons.

The EPA Groundwater Rule and PaDEP regulations require community groundwater systems to maintain a minimum entry point free chlorine residual of 0.4 mg/L and provide at least 4-log treatment (99.99 percent removal) of viruses. For this System, PaDEP has determined that 4-log treatment is achieved by maintaining a minimum of 1.0 mg/L free chlorine residual at the entry point, which for this System is monitored just upstream of the chlorine contact segment, and for which the peak flow through the chlorine contact segment is limited by the PaDEP Operation

Permit to be not more than 180 gallons per minute. It is noted that the entry point free chlorine residual is conservatively higher than the default minimum of 0.4 mg/L, because the free chlorine residual downstream of the chlorine contact segment cannot be directly measured. PaDEP regulations further require a minimum free chlorine residual of 0.2 mg/L be maintained throughout the distribution system.

The same sodium hypochlorite chemical feed pump that is used to keep the manganese dioxide coated surface of the filtration media continuously regenerated is also used to maintain the minimum entry point free chlorine residual, and to maintain the minimum free chlorine residual throughout the distribution system. The entry point free chlorine residual is monitored daily by the operator, and adjustments are made as necessary, although the residual level remains relatively steady. Distribution system free chlorine residual is monitored monthly by the operator.

Recommendations pertaining to disinfection are as follows:

1. Replace the sodium hypochlorite chemical feed pump with a new, simpler unit that will prime properly. (This is the same recommendation that was discussed in the treatment section of this Report.)
2. Confirm through records or by field investigation the location and size of the chlorine contact pipe segment in order to be better prepared to respond to leaks and to prevent damage from other work being performed in the area.

Based on the foregoing discussion of the work necessary for disinfection, an opinion of probable cost for recommended improvements to disinfection (included with the cost for the treatment system) is attached hereto as Exhibit 6.

Treatment building. The treatment building is a masonry block building having interior dimensions of 42’- 0” x 18’- 8” and a ceiling height of 12’-0”. The interior and exterior of the walls are unfinished, and the roof is shingled. The floor is unfinished concrete. There is currently no heating or ventilation and moisture is prevalent throughout the building. Insulation,

heating, and ventilation are recommended to reduce moisture and corrosion within the building. An efficient way to insulate the building would be to use furring strips and siding with insulation between the masonry and siding. The roof is also due for replacement. The roof hatches need to be revisited for ready access for servicing the wells. There are several instances of open or loose electrical boxes or conduits. As such all conductors, conduits, junction boxes, and panels should be reviewed by a qualified electrician for code compliance and refurbished as necessary.

Based on the foregoing discussion of the work necessary for the treatment building, an opinion of probable cost for recommended improvements to the treatment building is attached hereto as Exhibit 6.

Elevated storage tank. A 75,000 gallon elevated water storage tank provides finished water storage for the System. The PaDEP Public Water Supply Manual recommends the minimum storage capacity for systems not providing fire protection to be equal to one day's average consumption. The size of the tank meets this consumption requirement, however, evaluation of the size of the tank for fire protection purposes is beyond the scope of this Report.

The tank "floats" on the distribution system, meaning that it is directly connected to the distribution system with only one pipe serving as the inlet and outlet, and without a separate pump for the tank, and the level of the tank rises and falls as the pressure of the distribution system rises and falls. The tank and well pumps work together. A pressure gauge at the base of the tank monitors tank level, and communicates that level to the well pump controller. When the tank reaches the low water level setpoint (currently 45.5 psi, which corresponds to a tank water surface level of approximately 105 feet above the level of the pressure sensor), the well pumps are turned on, and water begins to fill the distribution system, and the tank begins to fill. Then when the tank reaches the high water setpoint (currently 48.5 psi, which corresponds to a tank water surface level of approximately 112 feet above the level of the pressure sensor), the well pumps are turned off, and without water entering the system from the wells, demand from consumption causes the tank level to drop, until the level again reaches the low water level setpoint.

The tank structure is considerably corroded on the exterior. The most recent repairs to the tank were conducted in 2018, which included replacement of the ground-level riser manway with a larger manway to provide safe and proper ingress/egress to the tank riser, repair of a leak at the connection between the riser and the tank bowl, and coating of this repair within the tank interior. An updated inspection of the tank was conducted on January 28, 2026 by Preferred Tank & Tower Maintenance Division, Inc. (hereinafter "PMD"). The report from PMD, including their findings and recommendations, is attached as Exhibit 3.

Based on the foregoing discussion of the work necessary for the elevated storage tank, and based on an informal rough estimate for this work provided by the tank inspector, an opinion of probable cost for recommended improvements to the elevated storage tank is attached hereto as Exhibit 6.

Distribution. Much of what is known about the System distribution piping comes from the memory of the operators and contractors who have worked on the system in recent years. Unfortunately, system mapping is incomplete, assembled from older plans dating back to 1909 and 1938. The only distribution system map available for this evaluation was prepared for the Economic Progress Alliance in 2007 by Porter Consulting Engineers, P.C., which references those older plans. A copy of this map is attached as Exhibit 4.

Much of the system, particularly south of Kepler Avenue, is reportedly old 6- and 8-inch cast iron mains. North of Kepler Avenue seems to be a hodge podge of different materials, including steel, plastic, and asbestos cement, and smaller sizes from 4-inch down to 3/4-inch. System operators give the impression that most of the troublesome sections where leaks have been prevalent are in the areas north of Kepler Avenue: Kepler Avenue, Comstock Street, Henry Street, Center Street, and along the lakefront properties. But at the same time, the operators have observed during repairs that the old cast iron pipe walls are becoming thin and brittle. Many of the shut off valves throughout the system have been discovered to not be operable. As a result, when leaks occur, it is often not possible to isolate small sections of the distribution piping, necessitating large areas of the System to be depressurized when leaks occur. Many of the hydrants throughout the system have also been discovered to be unable to be opened.

There are reportedly also separate fire protection mains on Kepler Avenue and areas south of Kepler Avenue, although the existence of separate fire lines is questionable among those questioned during the preparation of this Report. Such a fire protection system would necessarily also be supplied by the water tower, at a point of connection believed to be near the water tower. It is not known which hydrants are connected to the fire protection mains versus the distribution mains. Having separate fire protection mains is unusual, especially for a system of this size. If fire hydrants were all connected to the distribution mains, then any fire protection lines could be abandoned. The fire department has expressed a desire to have dry hydrants installed that could be used to draw water from the lake in emergencies, which is a matter to be considered separately from the recommendations in this Report.

The System has inventoried water service lines on attached Exhibit 5A, which lists service lines for which shut off valves have been located, and Exhibit 5B, which lists service lines for which the location of the shut off valve is unknown. The System also completed the service line inventory required by EPA's Lead and Copper Rule Revisions which notes that 26 service lines (17%) are galvanized requiring replacement, while all other lines were demonstrated to be non-lead. The System's interpretation of the tariff is that the System is responsible for the operation and maintenance of the service line from the main up to and including the shut off valve and valve box, but that the customers (i.e. individual property owners) are responsible for the operation and maintenance of the service line from the valve box to the building and within the building. When the mains prioritized in this Report are replaced, the service lines will be reconnected, which should at a minimum include replacement of the Systems portion of the service line (tapping saddle, corporation stop, service line to shut off valve, and shut off valve and valve box). Although it is anticipated that reconnection of the service lines to the customer's portion of the service line may trigger the need for replacement by the customer of a portion or all of the customers portion of the service line, depending on what condition the customers portion of the services line is found to be in during reconnection.

Individual customers are not currently metered, nor is it the recommendation of this Report to provide meters for individual customers, unless the System would elect to bill for service based on consumption (the System currently bills a flat rate for service). Should the System elect to

install customer meters or otherwise be required to install customer meters, the cost per meter is likely to be highly variable due to the varying state of repair of the service lines, occurrences of service lines which are shared among customers, and anticipated lack of a suitable location for the meters within many of the customer buildings. A case-by-case evaluation of potential meter locations would need to take place in order to estimate the cost as necessary to plan for financing and to solicit bids for the work.

Recommendations for the distribution system are as follows:

1. Create a comprehensive map of the system, including all mains (and what is known about the size and material and susceptibility to leaks), all mainline valves (and whether they are operable), and all hydrants (and whether they are operable). At some point also add the location of all service line shutoff valves to the map. Use the map to prioritize valves and hydrants to be replaced.
2. Replace priority system valves which will enable smaller sections of the distribution system to be isolated and shut down when repairs are needed (quantity of priority valves assumed to be approximately 30)
3. Replace priority system hydrants that are not functioning (quantity of priority hydrants assumed to be approximately 12)
4. Identify all hydrants (such as by paint color) as to their operable status and coordinate this effort with the fire department.
5. Replace priority mains that have been problematic with leaks and repair needs. Replacement mains should typically be 6-inch minimum for fire protection. Reconnect service lines when the mains are replaced line (typically including replacement of the tapping saddle, corporation stop, service line to shut off valve, and shut off valve and valve box). Top priority mains are those that repeatedly have been mentioned by system operators as most problematic, including:
    a. Kepler Avenue (approximately 850 ft)
    b. Henry Street (approximately 850 ft)
    c. Lakefront main, Kepler to Henry (approximately 340 ft)
    d. Lakefront main, end of George Street (approximately 640 ft)

e. Comstock Street (approximately 1170 ft)
f. Center Street (approximately 670 ft)
g. Utley Avenue (approximately 800 ft)

6. Prepare a plan for replacement of service lines identified to be galvanized requiring replacement. For about half of these, the System's portion of the service line will be replaced when the System replaces the main to which it connects. For the other half of these, main replacement is not identified as a priority in this Report, and therefore the System will need to separately replace these service lines, with the System responsible for the System portion of those service lines, and the customer responsible for the customer portion of those service lines.
7. Should the System elect to install customer meters or otherwise be required to install customer meters, conduct a case-by-case evaluation of potential meter locations in order to estimate the cost as necessary to plan for financing and solicit bids for the work.

Based on the foregoing discussion of the work necessary for the distribution system, an opinion of probable cost for recommended improvements for the distribution system is attached hereto as Exhibit 6.

VI. COST

An opinion of probable cost for the improvements recommended in this Report is attached as Exhibit 6 which includes the system components described herein: (a) wells and well pumps, (b) treatment including disinfection, (c) treatment building, (d) elevated storage tank, and (e) distribution system. Some of the estimates shown in Exhibit 6 were based on quotes provided to the System owner or estimates of the elevated water tank inspector. Other estimates represent judgement as an experienced and qualified professional generally familiar with similar construction projects. However, actual construction cost will vary from these estimates, since these estimates were prepared with no control over the cost of labor, materials, or equipment, or over contractors' methods of determining prices, or over competitive bidding or market conditions. Many of the estimates may vary significantly subject to unforeseeable conditions, some of which are discussed as follows:

a. It is recommended that the well pumps and motors be taken to a shop for a thorough inspection. Said inspection might reveal significant refurbishing to be done on the pumps and/or motors.
b. When the filter tanks are emptied, inspection might reveal significant repairs needed on the tank interior, such as coating repairs or broken internal piping.
c. The cost for surveying and mapping will be highly dependent on the quantity of valves and appurtenances that are readily visible or otherwise accessible, and on the availability of information regarding the mains. Higher costs will result if valves and appurtenances are buried and need to be uncovered or exposed, or if mains need to be exposed.
d. The number of valves to be replaced will depend on the number of valves found to be inoperable.
e. The number of hydrants to be replaced will depend on the number of hydrants found to be inoperable.
f. The cost for replacement of underground mains will be highly dependent on the proximity of those mains to other underground utilities. The estimates presented in this Report were prepared without the benefit of a site survey, information from potentially conflicting underground utilities, or an engineering design.

g. Order of magnitude estimates are provided for engineering consultation for various aspects of the work. The actual engineering cost will vary, and will be highly dependent on the required level of service for surveying, engineering design, bidding assistance, construction contract administration, construction oversight, and post-construction involvement.

h. The estimates do not include unforeseen emergency repairs that may become necessary prior to planned action being taken.

i. The cost to reconnect customer service lines (and if necessary to replace additional length of service lines) can be highly variable depending on the length of the reconnected line and the condition of the existing line, as existing service lines in poor condition may have to be replaced.

j. The cost to install customer meters, as required by the Pennsylvania Public Utility Commission, is likely to be highly variable due to the varying state of repair of the service lines, occurrences of service lines which are shared among customers, and anticipated lack of a suitable location for the meters within many of the customer buildings. Best case scenario would be a service line in good condition serving a single structure and with a suitable location for the meter, for which the cost to install a meter is estimated at approximately $500 to $600. Worst case scenario would be a service line in disrepair, the need to separate service lines serving multiple structures, and the need to install a meter in an outdoor vault due to lack of a suitable location within the home. Based on quotes from local plumbing contractors, the cost for this scenario, per meter, would be on the order of $6,000 to $7,000 or possibly more.

The opinion of cost prioritizes recommended improvements into phases for the purpose of financing portions of the work at a time.

EXHIBIT 1

USGS Location Map

NOTE: This Exhibit Contains Confidential Security Information. Please Contact Attorney Mark Shaw To Arrange A Method For Viewing.

EXHIBIT 2

Treatment Schematic

NOTE: This Exhibit Contains Confidential Security Information. Please Contact Attorney Mark Shaw To Arrange A Method For Viewing.

EXHIBIT 3

Elevated Storage Tank Inspection Report

PMD

PREFERRED TANK & TOWER

Maintenance Division, Inc.

NEW AND PREOWNED TANKS • TANKS RAISED, LOWERED AND MOVED
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TODD JOSEPH

CLP WATER, LLC

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PHOTO SHOWS FOUNDATION

THE FOUNDATION IS SHOWING SIGNS OF CRACKING/SPALLING AND IS NOT PROPERLY SEALED TO SAFEGUARD FROM WATER PENETRATION AND THE EFFECTS OF THE FREEZE-THAW CYCLE DURING COLD WEATHER. WE RECOMMEND TO HAND TOOL CLEAN FOUNDATION, REPAIR SPALLING/CRACKING AREAS AND APPLY ONE COAT OF SEALER TO EXPOSED AREAS.

TANK IS NOT PROPERLY GROUNDED ACCORDING TO NFPA 780 4.9.10 AND 4.9.10.1 REQUIREMENTS. WE RECOMMEND TO FURNISH AND INSTALL TWO GROUND CONDUCTORS. STRUCTURES EXCEEDING 250 FEET IN PERIMETER ARE REQUIRED TO HAVE AN ADDITIONAL CONDUCTOR FOR EVERY 100 FEET OF PERIMETER IN ACCORDANCE WITH NFPA 780 4.9.10 AND 4.9.10.1 REQUIREMENTS.

PHOTO SHOWS FOUNDATION

THE AREA BETWEEN THE FOUNDATION AND THE TANK LEGS IS NOT PROPERLY GROUTED. WE RECOMMEND RE-GROUTING TANK LEGS IN ACCORDANCE WITH AWWA D100-21 10.8 AND NFPA 22 2023 12.2.1.2 REQUIREMENTS.

THE STRUCTURAL INTEGRITY OF THE ANCHOR BOLTS SHOULD BE MAINTAINED TO WITHSTAND 100 MPH WINDS BLOWING FROM ANY DIRECTION AS REQUIRED BY THE AWWA. WE RECOMMEND TO CLEAN AROUND THE ANCHOR BOLTS AND WELD AROUND THE CIRCUMFERENCE OF THE BOLT-TO-NUT AND NUT-TO-BASE CONNECTION TO REINFORCE.

THE GRADE LEVEL SURROUNDING THE PIER PADS ARE NOT AT THE PROPER HEIGHT TO ALLOW FOR THE AWWA AND NFPA RECOMMENDED FOUNDATION EXPOSURE. WE RECOMMEND CONTRACTING A LOCAL EXCAVATOR TO GRADE THE CIRCUMFERENCE OF TANK TO EXPOSE A MINIMUM OF SIX INCHES OF FOUNDATION TO CREATE POSITIVE RUN OFF IN ACCORDANCE WITH NFPA 2018 12.2.2.3 AND AWWA D-100-21 12.7.1 REQUIREMENTS.

PHOTO SHOWS RISER MANWAY

THIS TANK DOES NOT HAVE THE REQUIRED SIGNAGE BY OSHA. WE RECOMMEND TO FURNISH AND INSTALL CONFINED SPACE AND FALL PROTECTION EQUIPMENT REQUIRED ON THE TANK IN ACCORDANCE WITH OSHA REGULATIONS.

WE RECOMMEND TO FURNISH AND INSTALL A 2" DIAMETER FROST PROOF AND LOCKABLE DRAIN VALVE TO AS CLOSE TO THE BOTTOM OF THE RISER AS POSSIBLE. WE ARE MAKING THIS RECOMMENDATION AS MOST TANK OWNER'S DO NOT HAVE THE MEANS IN PLACE TO EFFECTIVELY DRAIN THEIR TANKS. MOST FACILITIES MUST FOLLOW WATER DRAINAGE REQUIREMENTS THAT COMPLY WITH THEIR FACILITIES STORM WATER PLAN WHICH REQUIRES THE WATER TO BE DIRECTED INTO A STORM DRAIN. THE DRAIN VALVE ALLOWS THE HOOKUP OF A DRAIN LINE SO THE WATER MAY BE DIRECTIONALIZED.

THIS TANK IS NOT EQUIPPED WITH A THERMOMETER TO MONITOR WATER TEMPERATURE. WE RECOMMEND TO FURNISH AND INSTALL AN ASHCROFT THERMOMETER.

PHOTO SHOWS EXTERIOR OF TANK

THE EXTERIOR COATING OF THIS TANK IS EXHIBITING SIGNS OF CORROSION/STAINING/COATING FAILURE. WE RECOMMEND TO PROPERLY PREPARE THE AREAS OF DEFECT AND/OR ENTIRE EXTERIOR SURFACE AND APPLY A PROTECTIVE EXTERIOR COATING SYSTEM AS NEEDED.

DUE TO THE VISIBLE CORROSION, WE RECOMMEND TO PERFORM UT TESTING TO DETERMINE THE EXTENT OF THE CORROSION AND TO REPAIR AND REINFORCE AS NECESSARY.

PHOTO SHOWS UPWARD AND DOWNWARD VIEW OF LADDER

THE TANK IS MISSING THE FALL PROTECTION SIGNAGE. WE RECOMMEND TO FURNISH AND INSTALL FALL PROTECTION EQUIPMENT REQUIRED SIGNS ON THE TANK IN ACCORDANCE WITH OSHA REGULATIONS.

THE EXISTING LADDER IS NOT CONSTRUCTED TO OSHA REQUIREMENTS AND IS NOT COMPLIANT. WE RECOMMEND TO REPLACE THE EXISTING NON-COMPLIANT EXTERIOR LADDER WITH AN OSHA APPROVED LADDER WITH A SAFETY CLIMB DEVICE AND A LOCKABLE ANTI-CLIMB IN ACCORDANCE WITH OSHA, AWWA D100-21 5.4.2 AND NFPA 22 2023 13.7.2 CODE REQUIREMENTS.

THE EXTERIOR LADDER DOES NOT HAVE AN ANTI CLIMB DEVICE INSTALLED. WE RECOMMEND TO FURNISH AND INSTALL A LOCKABLE ANTI CLIMB DEVICE ON THE EXTERIOR LADDER TO PREVENT UNAUTHORIZED ACCESS AND VANDALISM.

PHOTO SHOWS WINDAGE RODS

THE WINDAGE RODS ARE DESIGNED TO RESIST AND STABILIZE THE TANK STRUCTURE AGAINST WIND AND SEISMIC LOADS COMBINED WITH DEAD AND LIVE LOADS. THE RODS SHOULD WITHSTAND 100 MPH WINDS BLOWING FROM ANY DIRECTION. IF THE BRACING REMAINS LOOSE, A SUDDEN COLLAPSE COULD OCCUR. WE RECOMMEND TO ADJUST THE WINDAGE RODS TO WITHSTAND 100 MPH WINDS BLOWING FROM ANY DIRECTION, AS REQUIRED BY AWWA D100-21 3.1.4, REQUIREMENTS. THIS SHOULD BE DONE ON AN EMERGENCY BASIS.

WE RECOMMEND THE PINS AND THE CLEVIS'S BE SPOT WELDED TO THE COLUMN WING PLATE AFTER THE WINDAGE RODS ARE ADJUSTED.

PHOTO SHOWS STRUTS

WE RECOMMEND RE-ENFORCING THE STRUT ENDS BY WELDING AFTER ADJUSTING THE WINDAGE AND STAY RODS.

RIVETED TANKS WITH LATTICE WORK COLUMNS HAVE SPLICE PLATES ABOVE EACH STRUT LEVEL. WE RECOMMEND TO WELD STRUT PLATE TO REINFORCE AND TO PREVENT COLUMN FAILURE.

PHOTO SHOWS RISER TO BOWL CONNECTION AND RISER STAY RODS

WE RECOMMEND TO STITCH WELD UNDERNEATH SIDE OF CATWALK WITH 2" STITCH WELDS ON 12" CENTERS TO IMPROVE STRUCTURAL INTEGRITY OF CATWALK.

PHOTO SHOWS CATWALK AND HANDRAILS

THE CATWALK HANDRAILS DOES NOT HAVE AN OPENING TO ACCESS CATWALK WITHOUT CLIMBING OVER HANDRAILS. WE RECOMMEND TO CREATE AN OPENING IN THE HANDRAILS AND INSTALL A SWING GATE IN THE OPENING TO ALLOW SAFE ACCESS TO CATWALK FROM CLIMBING LADDER.

THERE IS EVIDENCE THAT WATER IS PONDING ON THE CATWALK. WE RECOMMEND DRILLING ADDITIONAL WEEP HOLES IN THE CATWALK AS NECESSARY TO PREVENT THE PONDING OF WATER.

WE RECOMMEND TO WELD SPLICE PLATES IN BETWEEN CATWALK SECTIONS TO IMPROVE STRUCTURAL INTEGRITY OF CATWALK.

THE HANDRAILS ARE NOT COMPLIANT WITH OSHA REGULATION. WE RECOMMEND TO RAISE EXISTING HANDRAILS TO THE REQUIRED 42" HEIGHT IN ACCORDANCE WITH OSHA AND NFPA 22 2023 4.14.3 CODE REQUIREMENTS.

THE EXISTING HANDRAILS DO NOT HAVE AN INTERMEDIATE RAIL MAKING THE HANDRAIL NON-COMPLIANT. WE RECOMMEND TO FURNISH AND INSTALL AN INTERMEDIATE RAIL IN ACCORDANCE WITH OSHA AND NFPA 22 2023 4.14.3 CODE REQUIREMENTS.

TANK IS NOT EQUIPPED WITH SHELL MANWAYS. WE RECOMMEND TO INSTALL TWO 24" SHELL MANWAYS COMPLETE WITH A DAVIT ARM AND GALVANIZED BOLTS AT THE CATWALK LEVEL SPACED AT 180 DEGREES APART IN CONJUNCTION WITH TWO INTERIOR BOWL LADDERS INCLUDING SAFETY CLIMB DEVICES IN ACCORDANCE WITH OSHA, AWWA AND NFPA 22 2023 14.7.2.1 REQUIREMENTS.

WE RECOMMEND TO FURNISH AND INSTALL TWO INTERIOR BOWL LADDERS AT THE PRIMARY AND SECONDARY CATWALK MANWAYS WITH SAFETY CLIMB DEVICES IN ACCORDANCE WITH OSHA, AWWA D100-21 5.4.2.1 AND NFPA 22 2023 13.7.2 CODE REQUIREMENTS.

PHOTO SHOWS POST HEAD CONNECTION

TO ENSURE THE STRUCTURAL INTEGRITY OF THE TANK, WE RECOMMEND TO RE-WELD POST HEAD CONNECTIONS ABOVE THE CATWALK.

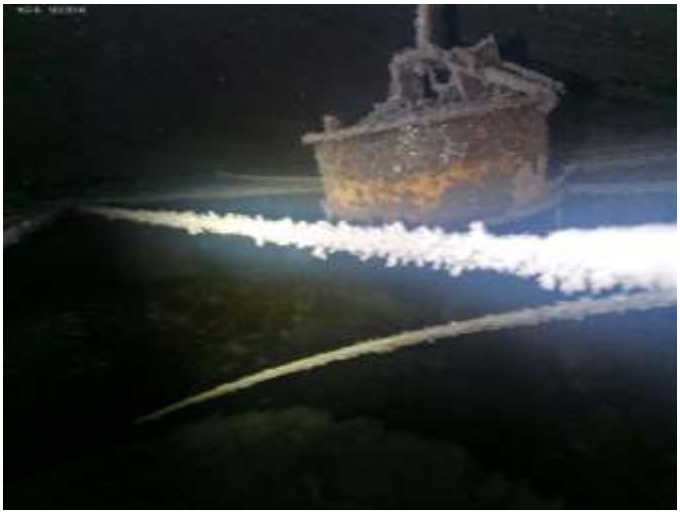

PHOTO SHOWS LIQUID LEVEL INDICATOR

THE LIQUID LEVEL INDICATOR IS BROKEN. WE RECOMMEND TO REPAIR, CLEAN AND LUBRICATE THE EXISTING LIQUID LEVEL INDICATOR AS NECESSARY IN ACCORDANCE WITH NFPA 22 2023 14.1.8 REQUIREMENTS.

THE EXISTING OVERFLOW DOES NOT EXTEND TO GRADE LEVEL RESULTING IN POOR CONTROL OVER WATER DISCHARGED. THIS CAN LEAD TO PONDING AND EROSION OF FOUNDATION AND THE SURROUND GRADE MATERIAL. WE RECOMMEND TO FURNISH AND INSTALL AN OVERFLOW EXTENSION TO GRADE COMPLETE WITH STANDOFFS ON 10' CENTERS AND A SCREENED FLAPPER VALVE IN ACCORDANCE WITH AWWA D100-11 AND NFPA 22 2013 REQUIREMENTS.

PHOTO SHOWS SHELL LADDER

THE EXISTING LADDER IS NOT CONSTRUCTED TO OSHA REQUIREMENTS AND IS NOT COMPLIANT. WE RECOMMEND TO REPLACE THE EXISTING NON-COMPLIANT EXTERIOR LADDER WITH AN OSHA APPROVED LADDER WITH A SAFETY CLIMB DEVICE IN ACCORDANCE WITH OSHA, AWWA D100-21 AND NFPA 22 2023 13.7.2 CODE REQUIREMENTS.

PHOTO SHOWS EXTERIOR OVERVIEW OF TANK

THE EXISTING LADDER IS NOT CONSTRUCTED TO OSHA REQUIREMENTS AND IS NOT COMPLIANT. WE RECOMMEND TO REPLACE THE EXISTING NON-COMPLIANT EXTERIOR LADDER WITH AN OSHA APPROVED LADDER WITH A SAFETY CLIMB DEVICE IN ACCORDANCE WITH OSHA, AWWA D100-21 AND NFPA 22 2023 13.7.2 CODE REQUIREMENTS.

DUE TO THE PITCH OF THE ROOF, WE RECOMMEND TO INSTALL PERMANENT TIE OFF POINTS TO ALLOW SAFE ACCESS TO THE ENTIRE ROOF PER OSHA REQUIREMENTS.

PHOTO SHOWS ROOF VENT

WE RECOMMEND TO REMOVE AND REPLACE THE NON COMPLIANT ROOF VENT WITH A FROST PROOF/PRESSURE PROOF VENT IN ACCORDANCE WITH AWWA D100-21 7.5, 7.5.1 AND 7.5.2 REQUIREMENTS.

ADDITIONALLY, WE RECOMMEND TO FURNISH AND INSTALL A FLANGED NECK/NOZZLE BETWEEN ROOF TOP AND THE NEW ROOF VENT TO ALLOW ATTACHMENT OF A VENTILATION FAN IN ACCORDANCE WITH NFPA 22 2023 4.15.11 REQUIREMENTS TO ALLOW REMOVAL OF THE VENT AND ATTACHMENT OF A FAN TO PROVIDE PROPER AIRFLOW AND QUALITY WHILE WELDING, WORKING, ABRASIVE BLASTING AND PAINTING INSIDE THE TANK AS WELL AS TO ALLOW PROPER VENTILATION VIA A FAN FOR CURING OF THE INTERIOR COATING.

THE SEGMENTS OF THE ROOFING SYSTEM WERE RIVETED TOGETHER WHEN THE TANK WAS ERECTED. THESES CONNECTIONS HAVE THE POTENTIAL TO OR HAVE BEGUN TO LOOSEN DUE TO CORROSION AND/OR AGE. WE RECOMMEND TO WELD ROOF SEGMENTS ON A 2" X 12" PATTERN AND AT ALL OF THE "T" CONNECTIONS TO INSURE THE STRUCTURAL INTEGRITY OF THE ROOFING SYSTEM.

PHOTO SHOWS PRIMARY ROOF HATCH

THE TANK DOES NOT HAVE AN INTERIOR LADDER INSTALLED. WE RECOMMEND TO FURNISH AND INSTALL AN INTERIOR LADDER WITH SAFETY CLIMB DEVICE IN ACCORDANCE WITH OSHA, AWWA D100-21 5.4.2.6 AND NFPA 22 2023 13.7.2 CODE REQUIREMENTS.

THE TANK ROOF IS NOT EQUIPPED WITH A SECONDARY OSHA APPROVED ROOF HATCH. WE RECOMMEND TO FURNISH AND INSTALL A SECONDARY 24" SQUARE ROOF HATCH 180 DEGREES FROM THE PRIMARY ROOF HATCH IN ACCORDANCE WITH AWWA D100-21 5.4.3.1 AND NFPA 22 2023 CODE REQUIREMENTS.

WE RECOMMEND TO FURNISH AND INSTALL A SECONDARY INTERIOR LADDER IN CONJUNCTION WITH THE INSTALLATION OF A SECONDARY ROOF HATCH INCLUDING SAFETY CLIMB DEVICE IN ACCORDANCE WITH OSHA, AWWA D100-21 AND NFPA 22 2023 CODE REQUIREMENTS.




PHOTO SHOWS INTERIOR OF TANK

WE RECOMMEND TO CAULK INTERIOR LAPPED ROOF JOINTS AFTER PAINTING TO PREVENT PREMATURE FAILURE OF COATING.

WE RECOMMEND TO CAULK THE ROOF TO RIM ANGLE CONNECTION TO PREVENT PREMATURE FAILURE OF COATING.

THE TANK IS EQUIPPED WITH A SPIDER ROD ASSEMBLY. THE SPIDER RODS WILL EVENTUALLY RUST THROUGH AND FALL INTO THE BOTTOM OF THE TANK. WE RECOMMEND TO REMOVE THE SPIDER ROD ASSEMBLY.

WE RECOMMEND TO FURNISH AND INSTALL AN OSHA APPROVED HANDRAIL SYSTEM AROUND RISER OPENING.

CATHODIC PROTECTION IS AN EFFECTIVE WAY TO HELP PROTECT YOUR TANK FROM THE EFFECTS OF CORROSION. WE RECOMMEND TO FURNISH AND INSTALL A PASSIVE CATHODIC PROTECTION SYSTEM AS A COST EFFECTIVE AND LOW MAINTENANCE MEANS OF FURTHER PROTECTING AND EXTENDING THE SERVICE LIFE OF YOUR TANK.

THE INTERIOR OF THIS TANK IS EXHIBITING SIGNS OF CORROSION/STAINING/COATING FAILURE. WE RECOMMEND TO PROPERLY PREPARE THE AREAS OF DEFECT AND/OR ENTIRE INTERIOR SURFACE AND APPLY AN AWWA APPROVED INTERIOR COATING SYSTEM AS NEEDED.

AT THE TIME OF INSPECTION, THE WATER WAS FROZEN MAKING THE ROV PORTION OF THE INSPECTION IMPOSSIBLE. WE RECOMMEND TO INSTALL A MIXING SYSTEM TO PREVENT THE TANK FROM FREEZING AND POSSIBLY DAMAGING THE TANK AND TO REMAIN IN COMPLIANCE WITH NFPA WATER TEMPERATURE LIMITS.

EXHIBIT 4

Historical Distribution System Map

NOTE: This Exhibit Contains Confidential Security Information. Please Contact Attorney Mark Shaw To Arrange A Method For Viewing.

EXHIBIT 5A

Service Address Listing
(with shut off valves located)

CONFIDENTIAL

	SERVICE ADDRESS	Shut off
[redacted]	12241 Lake St	[redacted]
	WOODLAND	
[redacted]	10783 Woodland Ave	[redacted]
[redacted]	10793 Woodland Ave	
[redacted]	10805 Woodland Ave	[redacted]
	BROWN	
[redacted]	10851 Brown St	[redacted]
[redacted]	10857 Brown St	[redacted]
[redacted]	10869 Brown St	[redacted]
	GEORGE	
[redacted]	11003 George St	[redacted]
[redacted]	11035 George St	[redacted]
	REED	
[redacted]	12495 Reed Ave	[redacted]
[redacted]	12512 Reed Ave	[redacted]
[redacted]	12534 Reed Ave	[redacted]
[redacted]	12543 Reed Ave	[redacted]
[redacted]	12554 Reed Ave	[redacted]
	SUNSET	
[redacted]	12221 Sunset Dr	[redacted]
[redacted]	12231 Sunset Dr	[redacted]
	HENRY	
[redacted]	10933 Henry St	[redacted]
[redacted]	10936 Henry St	[redacted]
[redacted]	10974 Henry St	[redacted]
[redacted]	11005 Henry St	[redacted]
[redacted]	11036 Henry St	[redacted]
[redacted]	11041 Henry St	[redacted]
[redacted]	11044 Henry St	[redacted]
[redacted]	11065 Henry St	[redacted]
[redacted]	11067 Henry St	[redacted]
[redacted]	11070 Henry St	[redacted]
[redacted]	11062 Henry St	[redacted]
	LAKE	
[redacted]	12366 Lake St	[redacted]
[redacted]	12386 Lake st	[redacted]
[redacted]	12398 Lake St	[redacted]
[redacted]	12414 Lake St	[redacted]
[redacted]	12425 Lake St	[redacted]
[redacted]	12435 Lake St Condo 101	[redacted]
[redacted]	[redacted]	[redacted]
[redacted]	12435 Lake St Condo 201	[redacted]
[redacted]	12435 Lake St Condo 301	[redacted]

CONFIDENTIAL

	LAKEFRONT	
[redacted]	10895 Lake front St	[redacted]
[redacted]	10901 Lake front St	[redacted]
[redacted]	10911 Lake front St	[redacted]
[redacted]	10926 Lake Front St	[redacted]
[redacted]	10929 Lake Front St	[redacted]
[redacted]	10925 Lake Front St	[redacted]
	N. LAKEFRONT	
[redacted]	12564 N Lakefront Dr	[redacted]
[redacted]	12582 N Lakefront Dr	[redacted]
[redacted]	12589 N Lakefront Dr	[redacted]
[redacted]	12601 N Lakefront Dr	[redacted]
[redacted]	12602 N Lakefront Dr	[redacted]
[redacted]	12572 N Lakefront Dr	[redacted]
	COMSTOCK	
[redacted]	12220 Comstock St	[redacted]
[redacted]	12234 Comstock St	[redacted]
[redacted]	12273 Comstock St	[redacted]
[redacted]	12276 Comstock St	[redacted]
[redacted]	12283 Comstock St	[redacted]
[redacted]	12288 Comstock St	[redacted]
[redacted]	12291 Comstock St	[redacted]
[redacted]	12303 Comstock St	[redacted]
[redacted]	12449 Comstock St	[redacted]
[redacted]	12499 Comstock St	[redacted]
[redacted]	12525 Comstock St	[redacted]
[redacted]	12545 Comstock St	[redacted]
[redacted]	12549 Comstock St	[redacted]
[redacted]	12553 Comstock St	[redacted]
[redacted]	12572 Comstock St	[redacted]
[redacted]	12573 Comstock St	[redacted]
[redacted]	12583 Comstock St	[redacted]
[redacted]	12587 Comstock St	[redacted]
[redacted]	12596 Comstock St	[redacted]
[redacted]	12597 Comstock St	[redacted]
[redacted]	12608 Comstock St	[redacted]
[redacted]	12626 Comstock St	[redacted]
[redacted]	12636 Comstock St	[redacted]
[redacted]	12641 Comstock St	[redacted]
[redacted]	12646 Comstock St	[redacted]
[redacted]	12656 Comstock St	[redacted]
[redacted]	12665 Comstock St	[redacted]
[redacted]	12666 Comstock St	[redacted]
[redacted]	12676 Comstock St	[redacted]

CONFIDENTIAL

[redacted]	12689 Comstock St	[redacted]
	UTLEY	
[redacted]	10825 Utley Ave Condo 101	[redacted]
[redacted]	10825 Utley Ave Condo 102	
[redacted]	10825 Utley Ave Condo 103	[redacted]
[redacted]	10836 Utley Ave	[redacted]
[redacted]	10845 Utley Ave	[redacted]
[redacted]	10854 Utley Ave	[redacted]
[redacted]	10862 Utley Ave	[redacted]
[redacted]	10867 Utley Ave	[redacted]
[redacted]	10868 Utley Ave	[redacted]
	CENTER ST W	
[redacted]	12218 Center St W	[redacted]
[redacted]	12124 Center St W	[redacted]
[redacted]	12132 Center St W	[redacted]
[redacted]	12172 Center St W	[redacted]
[redacted]	12222 Center St W	[redacted]
[redacted]	12251 Center St W	[redacted]
[redacted]	12156 Center St W	[redacted]
[redacted]	12255 Center St W	[redacted]
[redacted]	12263 Center St W	[redacted]
	CENTER ST	
[redacted]	12315 Center St	[redacted]
[redacted]		
[redacted]	12321 Center St	[redacted]
[redacted]	12447 Center St	[redacted]
[redacted]	12476 Center St	[redacted]
[redacted]	12489 Center St	[redacted]
[redacted]	12536 Center St	[redacted]
[redacted]	12546 Center St	[redacted]
[redacted]	12576 Center St	[redacted]
[redacted]	12612 Center St	[redacted]
[redacted]	12626 Center St	[redacted]
	KEPLER	
[redacted]	10932 Kepler Ave	[redacted]
[redacted]	10975 Kepler Ave	
[redacted]	11013 Kepler Ave	[redacted]
[redacted]	11006 Kepler Ave	[redacted]
[redacted]	11020 Kepler Ave	[redacted]
[redacted]	11030 Kepler Ave	[redacted]
[redacted]	11036 Kepler Ave	[redacted]
[redacted]	11038 Kepler Ave.	[redacted]

CONFIDENTIAL

EXHIBIT 5B

Service Address Listing

(with shut off valves not located)

CONFIDENTIAL

	SERVICE ADDRESS	Shut off
	WOODLAND	
[redacted]	10807 Woodland Ave	Could not locate
	BROWN	
[redacted]	10860 Brown St	Could not locate
	REED	
[redacted]	12516 Reed Ave	Could not locate
	SUNSET	
[redacted]	12234 Sunset Dr	Could not locate
	HENRY	
[redacted]	10944 Henry St	Could not locate
[redacted]	10987 Henry St	Could not locate
[redacted]	10997 Henry St	Could not locate
[redacted]	11005 Henry St	Could not locate
[redacted]	11019 Henry St	Could not locate
[redacted]	11043 Henry St	Could not locate
	LAKE	
[redacted]	12375 Lake St	Could not locate
	LAKEFRONT	
[redacted]	10913 Lake front St	Could not locate
[redacted]	10921 Lake front St	Could not locate
	N. LAKEFRONT	
[redacted]	12544 N Lakefront Dr	Could not locate
[redacted]	12556B N Lakefront Dr	Could not locate
[redacted]	12556A N Lakefront Dr	Could not locate
[redacted]	12587 N Lakefront Dr	Could not locate
	COMSTOCK	
[redacted]	12236 Comstock St	Could not locate
[redacted]	12239 Comstock St	Could not locate
[redacted]	12272 Comstock St	Could not locate
[redacted]	12302 Comstock St	Could not locate
[redacted]	12455 Comstock St	Could not locate
[redacted]	12465 Comstock St	Could not locate
[redacted]	12492 Comstock St	Could not locate
[redacted]	12513 Comstock St	Could not locate
[redacted]	12538 Comstock St	Could not locate
[redacted]	12554 Comstock St	Could not locate
[redacted]	12562 Comstock St	Could not locate
[redacted]	12563 Comstock St	Could not locate
[redacted]	12645 Comstock St	Could not locate
	UTLEY	
[redacted]	10833 Utley Ave	Could not locate
[redacted]	10861 Utley Ave	Could not locate
[redacted]	10877 Utley Ave	Could not locate

CONFIDENTIAL

	CENTER ST W	
[redacted]	12124 Center St W	Could not locate though home owner says it's in yard
	CENTER ST	
[redacted]	12305 Center St	Could not locate
[redacted]	12413 Center St	Could not locate
[redacted]	12428 Center St	Could not locate
[redacted]	12439 Center St	Could not locate
[redacted]	12556 Center St	Could not locate
	KEPLER	
[redacted]	11016 Kepler Ave	Could not locate

CONFIDENTIAL

EXHIBIT 6

Opinion of Probable Costs for Recommended Improvements

Conneaut Lake Water System
Recommended Improvements

Opinion of Probable Cost

		Phase 1	Phase 2	Phase 3	Phase 4	Phase 5	Phase 6
Wells and well pumps							
Access improvements	$10,000	$10,000					
Quote from Chatfield Drilling	$64,000	$64,000					
Remove pump and motor							
Well inspection by camera							
Well cleaning							
Reinstall pump and motor							
Pump flow test							
Shop evaluation and refurbishing	$6,000	$6,000					
Transducers for drawdown measurement	$1,000	$1,000					
Spare parts	$2,000	$2,000					
Engineering consultation	$4,000	$4,000					
Treatment system including disinfection							
Replace filter media	$45,000	$45,000					
Miscellaneous plumbing and tank repairs	$5,000	$5,000					
Miscellaneous valve repair/replacement	$5,000	$5,000					
Replace chemical feed pumps	$3,000	$3,000					
Spare parts	$4,000	$4,000					
Spare PLC and touchscreen	$15,000	$15,000					
Investigate and possibly repermit sodium silicate feed (P)	$6,000	$6,000					
Engineering consultation	$10,000	$10,000					
Treatment building							
Estimate from Todd Joseph	$110,000	$110,000					
Replace heating system							
New insulation and siding							
Replace roof							
Miscellaneous electrical upgrades	$30,000	$30,000					
Engineering consultation	$10,000	$10,000					
Elevated storage tank							
Quote for emergency repairs from PMD	$61,000	$61,000					
Windage rods adjustments and spot welding							
Strut end reinforcement							
Catwalk reinforcement							
Post head welded connection repairs							
Roof vent replacement							
Roof plate connection reinforcement							
Remove interior sediment and debris							
Informal estimate from PMD	$650,000		$650,000				
Foundation repairs							
Install grounding							
Drain valve installation							
Exterior preparation and coating							
Replace exterior ladders							
Catwalk handrailing and gate replacement							
Shell manway and interior ladder installation							
Liquid level indicator upgrade							
Overflow pipe installation							
Install interior ladders							
Repair roof hatch and install secondary hatch							
Interior handrailing installation							
Interior preparation and coating (P)							
Tank mixer installation (P)							
Cathodic protection installation (P)							
Remove building	$1,000						$1,000
New panel for level sensor	$4,000						$4,000
New level communication to plant	$6,000						$6,000
New fencing	$5,000						$5,000
Engineering consultation and permitting	$40,000	$6,000	$32,000				$2,000
Distribution system							
System surveying and mapping	$30,000	$30,000					
Valve replacement	$150,000				$60,000		$90,000
Hydrant replacement	$108,000						$108,000
Hydrant identification	$6,000						$6,000
Mainline replacement							
Kepler Avenue	$147,600			$147,600			
Henry Street	$156,600			$156,600			
Lakefront at Henry	$66,600			$66,600			
Lakefront at George	$105,300				$105,300		
Comstock Street	$236,400					$236,400	
Center Street	$107,400					$107,400	
Utley Avenue	$160,500				$160,500		
Street restoration	$130,000			$40,000	$35,000	$35,000	$20,000
Yard restoration	$30,000			$9,000	$8,000	$8,000	$5,000
Lead service line replacement	$52,000						$52,000
Evaluation of potential customer meter locations	$20,000	$20,000					
(does not include cost to procure and install customer meters)							
Engineering consultation	$170,000			$60,000	$45,000	$40,000	$25,000
Total of above costs	$2,773,400	$447,000	$682,000	$479,800	$413,800	$426,800	$324,000

(1)

CONNEAUT LAKE PARK WATER CORPORATION
CUSTOMER COMPLAINT LOG

	Name	Address	Date	Type of Complaint	How Resolved	Date Resolved
1	[redacted]	12564 N. Lakefront	5/28 2024	FB post in CLP Water Corp group, no water	commented back, no response, but posted back on hours later	5/29 2024
2	[redacted]	12546 Center St	5/29 2024	FB comment in CLP Water Corp. Leak at intersection of Center & Henry	spoke to Allen and emailed Dale Costa for an update 5/29/24	Fixed
3	[redacted]	12476 Center St	5/29 2024	Added confirmation in FB Post		Fixed
4	[redacted]	10807 Woodland Ave	5/29 2024	Called to confirm 12273 Comstock is his and updated billing info	fixed on my spreadsheet	5/29 2024
5	[redacted]	11036 Henry St.	6/3 2024	Called asking about update on water leak on Henry St.	Told her we are working on it. On the list for Dale to come take a look	Fixed
6	[redacted]	12546 Center St	6/19 2024	FB post of leak on Center/Henry	Responded that I would ask about update.	Fixed
7	[redacted]	12583/10836 Comstock Utley	6/19 2024	Called about water being Brown	called Allen, confirmed hydrant was flushed this morning. Had her run her water 10-15 mins	6/19 2024

Records of Complaints shall be kept for a Period of 4 years.

EXHIBIT E

CONFIDENTIAL

(2)

CONNEAUT LAKE PARK WATER CORPORATION
CUSTOMER COMPLAINT LOG

	Name	Address	Date	Type of Complaint	How Resolved	Date Resolved
1	[redacted]	12546 Center St.	6/22 2024	Low water pressure phone	Sent Michael Todd also called over to check out 6/24 water flowing on street	6/24/24 said pressure good.
2	[redacted]	11041 Henry St.	7/10 2024	Leak on Henry	Allen going over to check out road 7/11/24	Fixed
3	[redacted]	11019 Henry St.	7/25 2024	Leak on Henry	Todd called back	Fixed
4	[redacted]	11070 Henry St	8/2 2024	Leak on Henry	I went over to see road and spoke with [redacted] Going to try & scrap road and fillin	Fixed
5	[redacted]	12288 Comstock	8/18 2024	FB pic water brown in color	posted picture of procedure if water has color/odor postcard	replied that it cleared up
6	[redacted]	10929 | 10925 Lake Front St	8/14 2024	FB pictures of leak over on Henry	I didn't respond, she doesn't live over there why post pictures?	Fixed KMO
7	[redacted]	12589 N. Lakefront St.	9/3 2024	Spoke at meeting 8/29 about tapping in. He called 9/3	Told him Allen would call 9/4. Followed up with him myself 9/4. Left message 4pm	He called back gave him dust Bence # for hook-up

*called to check in 9/9 Justin hasn't called back yet.

called Justin said he's calling him back today 9/9

Records of Complaints shall be kept for a Period of 4 years.

EXHIBIT E

CONFIDENTIAL

(3)

CONNEAUT LAKE PARK WATER CORPORATION
CUSTOMER COMPLAINT LOG

	Name	Address	Date	Type of Complaint	How Resolved	Date Resolved
	[redacted]	10857 Brown St	9/6 2024	called has no water	Water leak on Brown guys on it 9/6/24 1pm called him back to tell him	9/6 leak fixed
	[redacted]	12536 Center St.	9/18 2024	water leak in front of house	Allen and I went and looked called Justin he is coming Tues 9/24 Also called [redacted] 9/18	10/17 leak fixed
	[redacted]	12499 Comstock	9/26 2024	Wasn't notified about water shut off	called left message when water came back on has no email or phone # on file	9/26/24
	[redacted]	12601 N Lakefront	9/24 2024	Responded to email about water shut off and expressed her frustration	Responded explaining we cannot help when the system goes down or needs fixed	9/24/24
	[redacted]	12589 N. Lakefront	10/8 2024	Asked about using own plumbers	called back said I would ask Todd Todd said no called him.	10/8 2024
	[redacted]	12544 N. Lakefront Dr.	12/6 2024	Low water pressure for 1 week	Called 12/6 to make arrangements Left message. Talked to daughter [redacted] 12/7 9am Talked to [redacted] Allen went & looked 12/7 sent video	scheduled Justin
	[redacted]	12564 N. Lakefront Dr.	12/10	I called out of courtesy	Turns out leak is between his 2 houses	
	[redacted]	~~12276~~ Comstock	12/10	~~Water shut off~~ turned back on as advised by lawyer	failure to pay bill 2023, 2024	

Records of Complaints shall be kept for a Period of 4 years.

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EXHIBIT
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(4)

CONNEAUT LAKE PARK WATER CORPORATION
CUSTOMER COMPLAINT LOG

	Name	Address	Date	Type of Complaint	How Resolved	Date Resolved
	[redacted]	12564 N. Lakefront Dr.	12/19 2024	Water leak is by his house. Allen & I met him this morning to discuss. He is scheduling his guy to come look. Possible water shut down. Working with Ed to resolve.		
	[redacted]	10929/10925 Lakefront St.	12/18 2024	Posted on facebook about her dad's water pressure any update?	Responded with scheduled [redacted] meeting 12/19/24	12/19
	[redacted]	12234 Comstock	12/27 2024	Called complaining about water bill	Hasn't paid in 2 years first contact in 2 years	
	[redacted]	11019 Henry St.	2/19 2025	called saying she wasn't notified about rate increase.	Spoke to Mark Shaw (lawyer) and he said she was sent a notice 8/30/23 and no other notice needed sent	left [redacted] message 2/20/20
	[redacted]	12512 Reed Ave	2/26 2025	Complained about low water pressure.	called Al & Chris, tower gauges froze, overflowed	2/26 2025
	[redacted]	10925 Lakefront St	3/10 2025	Water has terrible smell & taste	called Allen & Chris to report Chris & Matt flushing hydrant	
	[redacted]	10901 Lakefront St.	3/10 2025	low pressure via FB didn't answer 3/12	Chris & Matt checking tower nothing found	3/11 2025

Records of Complaints shall be kept for a Period of 4 years.

CONFIDENTIAL

EXHIBIT
E

(5)

CONNEAUT LAKE PARK WATER CORPORATION
CUSTOMER COMPLAINT LOG

	Name	Address	Date	Type of Complaint	How Resolved	Date Resolved
1	[redacted]	12554 Comstock St.	3/10 2025	low pressure been that way for months I called said they are used to it.	Chris & Matt checking tower nothing found	3/11 2025
2	[redacted]	10807 Woodland Ave	4/5 2025 emailed	low pressure contacted Allen he checked	couldn't find an issue she went back home will let me know next weekend	4/6 2025 never heard back
3	[redacted]	12546 Center St.	7/10 2025	low water pressure	Al & I are investigating went over water pressure back to normal no sign of a leak	7/10/25
4	[redacted]	12636 Comstock St.	8/15 2025	called about paying water bill	called back 8/18	
5	[redacted]	11019 Henry St	8/18 2025	Water leak on Henry	called back 8/18 waiting for Justin to look at it.	Leak fixed
6	[redacted]	12425 Lake St.	9/3 2025	Email about located curb stop	Allen and I headed over 9/4 to locate it. Found 8ft back out the house	called, texted emailed [redacted]
7	[redacted]	10877 Utley Ave	8/22 2025	At annual meeting said pressure is low mid morning	Spoke to Matt and let him know.	

Records of Complaints shall be kept for a Period of 4 years.

CONFIDENTIAL

EXHIBIT E

(6)

CONNEAUT LAKE PARK WATER CORPORATION
CUSTOMER COMPLAINT LOG

	Name	Address	Date	Type of Complaint	How Resolved	Date Resolved
1	[redacted]	12499 Comstock St.	8/22 2025	strong chlorine smell in water	reported to Matt	
2	[redacted]	12641 Comstock St.	8/22 2025	"	"	
3	[redacted]	12124 Center St W	9/19 2025	sulfer smell	Spoke with Matt after meeting going to wait to flush system until Spring	flush system in the spring
4	[redacted]	11005 Henry St 1:43pm	11/20 2025	responding to letter about 2 houses on one lot	Not complaining, explained his 2 houses on 1 lot d water connection 1 single family	11/21 2025
5	[redacted]	11006 Kepler St 9:16am	11/21 2025	"	Thought he was being billed for 2, adjusting in 2026	11/21 2025
6	[redacted]	12273 Comstock St 11:17am	11/21 2025	"	called to verify single family dwelling NOT a duplex	11/21 2025
7	[redacted]	12222 Center St W	12/6 2025	called to report neighbor's house had water leak	called home owner [redacted] she sent over contractor broken hose no damage	12/6 2025

Records of Complaints shall be kept for a Period of 4 years.

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EXHIBIT E

(7)

CONNEAUT LAKE PARK WATER CORPORATION
CUSTOMER COMPLAINT LOG

	Name	Address	Date	Type of Complaint	How Resolved	Date Resolved
1	[redacted]	10857 Brown St	12/16 2025	Needed help with online portal	Called him back & let him know I sent a link to his email for access	12/16 2025
2	[redacted]	10857 Brown St	1/22 2026	Appfolio work order placement of garbage cans	1/22 called and set him up in front 10859 for pick-up. He is calling	1/22 2026
3	[redacted]	12276 Comstock St	1/28 2026	Called said water leak inside house request to shut off at curb	Called Allen he went over to locate valve, too much snow. Her contractor shut off by hot water tank	1/28 2026
4	[redacted]	[redacted] (sister) 12303 Comstock St	1/31 2026	Frozen pipes at house needed help shutting off at curb.	Allen went over and helped	1/31 2026
5	[redacted]	12544 N Lakefront	2/4 2026	Almost no water pressure	water leak in front of [redacted] calling plumber to fix	
6	[redacted]	12572 N. Lakefront	2/5 2026	Report of puddle in front of house.	" "	
*	posted on Facebook email everyone 2x about leak and possible shut off	2/5/26 Also called everyone w/o an email. 2 people w/o either				

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Records of Complaints shall be kept for a Period of 4 years.

EXHIBIT E

(8)

CONNEAUT LAKE PARK WATER CORPORATION
CUSTOMER COMPLAINT LOG

	Name	Address	Date	Type of Complaint	How Resolved	Date Resolved
1	[redacted]	11016 Kepler Ave	2/15 2026	No water, sent email asking if the water was off.	She responded Monday said water was off for a short time, but back on after a few minutes	2/16 2026
2	[redacted]	12276 Comstock St	3/4 2026	[redacted] (nephew) said he had no water	Michael went over and turned it on. It was off from fixing leak on 3/3	3/4 2026
3						
4						
5						
6						
7						

Records of Complaints shall be kept for a Period of 4 years.

EXHIBIT E

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Summary of Test Results Reported in Annual CCR
2020 - 2024

Year	Contaminant	Applicable Water Standard	Sample Results		Exceedance?
			Low	High	
2020	Arsenic (ppb)	10 ppb	1.3	6.7	No
2020	Chlorine (ppm)	4 ppm	1	2.71	No
2020	Barium (ppm)	2 ppm	0.15		No
2020	Fluoride (ppm)	2 ppm	0.1		No
2020	Haloacentic acids (ppb)	60 ppb	5.6		No
2020	Trihalomethanes (ppb)	60 ppb	5.2		No
2020	Chlorine (Entry Point Disinfectant Residual) (ppm)	4 ppm	1	2.71	No
2020	Lead (ppb)	15 ppb	0.95		No
2020	Copper (ppm)	1.3 ppm	0.014		No
2021	Arsenic (ppb)	10 ppb	0.2		No
2021	Chlorine (ppm)	4 ppm	1.01	2.18	No
2021	Barium (ppm)	2 ppm	0.15		No
2021	Fluoride (ppm)	2 ppm	0.1		No
2021	Haloacentic acids (ppb)	60 ppb	5.6		No
2021	Trihalomethanes (ppb)	80 ppb	5.2		No
2021	Chlorine (Entry Point Disinfectant Residual) (ppm)	4 ppm	1.01	2.18	No
2021	Lead (ppb)	15 ppb	0.95		No
2021	Copper (ppm)	1.3 ppm	0.014		No
2022	Arsenic (ppb)	10 ppb	0	4	No
2022	Chlorine (ppm)	4 ppm	0.99	1.55	No
2022	Barium (ppm)	2 ppm	0.15		No
2022	Fluoride (ppm)	2 ppm	0.1		No
2022	Haloacentic acids (ppb)	60 ppb	15		No
2022	Trihalomethanes (ppb)	60 ppb	9.6		No
2022	Chlorine (Entry Point Disinfectant Residual) (ppm)	4 ppm	1.01	2.19	No
2022	Lead (ppb)	15 ppb	0.86		No
2022	Copper (ppm)	1.3 ppm	0.2		No
2023	Arsenic (ppb)	10 ppb	0	4.8	No
2023	Chlorine (ppm)	4 ppm	0.81	1.54	No
2023	Haloacentic acids (ppb)	60 ppb	15		No

EXHIBIT F

Summary of Test Results Reported in Annual CCR
2020 - 2024

Year	Contaminant	Applicable Water Standard	Sample Results		Exceedance?
			Low	High	
2023	Trihalomethanes (ppb)	80 ppb	9.6		No
2023	Chlorine (Entry Point Disinfectant Residual) (ppm)	4 ppm	1.03	3.36	No
2023	Lead (ppb)	15 ppb	0.86		No
2023	Copper (ppm)	1.3 ppm	0.2		No
2024	Arsenic (ppb)	10 ppb	0	7.2	No
2024	Chlorine (ppm)	4 ppm	0.97	1.42	No
2024	Barium (ppm)	2 ppm	0.128		No
2024	Toluene (ppm)	1 ppm	0.00076		No
2024	Chlorine (Entry Point Disinfectant Residual)	4 ppm	1.07	2.99	No
2024	Lead (ppb)	15 ppb	0.86		No
2024	Copper (ppm)	1.3 ppm	0.2		No

Summary of Water System Pressures

Month	PSIG Low	PSIG High
Jan-24	44.9	48.3
Feb-24	44.9	48.6
Mar-24	45.6	48.6
Apr-24	45.0	48.0
May-24	45.4	48.1
Jun-24	45.9	48.1
Jul-24	41.3	48.1
Aug-24	45.0	48.1
Sep-24	44.9	48.3
Oct-24	46.1	48.3
Nov-24	45.1	48.1
Dec-24	45.3	48.4
Jan-25	32.7	48.8
Feb-25	45.1	49.9
Mar-25	45.5	48.6
Apr-25	37.4	48.7

Pursuant to 52 Pa.Code section 65.6, "The utility shal
maintain normal operating pressures of not less than
25 p.s.i.g. nor more than 125 p.s.i.g."

Summary of Chlorine Readings

Month	Free Cl2 Entry Point (ppm)		Free Cl2 Distribution (ppm)		MCL (ppm)	Exceedance?	
	Low	High	Low	High		Entry Point	Distribution
Jan-23	1.1	2.17	0.69	1.93	4	No	No
Feb-23	1.1	1.66	0.79	1.29	4	No	No
Mar-23	1.07	2.06	0.71	1.56	4	No	No
Apr-23	1.01	1.95	0.87	1.81	4	No	No
May-23	1.12	1.83	0.91	1.39	4	No	No
Jun-23	1.11	2	0.73	1.3	4	No	No
Jul-23	1.05	2.19	1.01	1.61	4	No	No
Aug-23	1.16	2.4	1.02	1.89	4	No	No
Sep-23	1.08	2.18	1.32	1.9	4	No	No
Oct-23	1.18	2.19	1.03	1.87	4	No	No
Nov-23	1.32	1.97	1.09	1.56	4	No	No
Dec-23	1.15	1.83	1.1	1.47	4	No	No
Jan-24	1.1	2.22	0.95	1.32	4	No	No
Feb-24	1.15	1.7	0.9	1.42	4	No	No
Mar-24	1.17	2.17	0.89	1.95	4	No	No
Apr-24	1.14	2.99	0.86	1.49	4	No	No
May-24	1.11	1.6	0.99	1.27	4	No	No
Jun-24	1.07	1.9	0.82	1.78	4	No	No
Jul-24	1.21	2.18	0.87	2.17	4	No	No
Aug-24	1.32	2.11	0.64	1.48	4	No	No
Sep-24	1.42	2	1.43	1.64	4	No	No
Oct-24	1.21	1.74	1.16	1.5	4	No	No
Nov-24	1.38	2.56	1.28	2.01	4	No	No
Dec-24	1.19	1.86	0.72	1.68	4	No	No
Jan-25	1.35	2.18	1.39	1.8	4	No	No
Feb-25	1.15	2.43	0.98	1.87	4	No	No
Mar-25	1.13	1.83	0.72	1.49	4	No	No
Apr-25	1.05	2.04	0.85	1.81	4	No	No
May-25	1.08	2.17	1.01	1.42	4	No	No
Jun-25	1.12	1.7	0.87	1.48	4	No	No
Jul-25	1.1	1.71	0.99	1.38	4	No	No
Aug-25	1.16	1.52	1.09	1.38	4	No	No
Sep-25	1.21	1.55	1.16	1.27	4	No	No
Oct-25	1.1	1.93	1.29	1.56	4	No	No
Nov-25	1.27	2.18	0.97	1.81	4	No	No
Dec-25	1.5	2	0.86	1.73	4	No	No

PA PUC, I&E v. Conneaut Lake Water Corporation Inc.
Docket Nos. P-2024-3051855, I-2024-3051857
Interrogatories of the Office of Consumer Advocate
Set 16 to Conneaut Lake Water Corporation Inc.

3. Please describe in detail the Company's plan to upgrade the water system, including but not limited to scope, purpose, timeline, costs, and completion schedule.

RESPONSE:

Upon completion of the Report, CLPWC will provide a copy of the final report to the parties with a proposed sequence for the improvements. CLPWC anticipates the following projects will come out of the report:

a. Water Tank repairs

b. Improvements to the treatment building (sand filter replacement; other miscellaneous improvements)

c. Replacement of one of the water well pumps

d. Replacement of various water mains

e. Installation of water meters

CLPWC anticipates the total cost of these improvements to be approximately $2,000,000, possibly less, and intends to fund this through PENNVEST loans of $500,000 each in each succeeding year over a 4 year period. CLPWC will approach PENNVEST to fund the improvement relying on the Small Project Program. CLPWC will divide the projects to stay within the funding limits of the Program.

Summer 2026 - CLPWC will begin construction of the first project, provided it receives the PENNVEST funding and the applicable permits for construction, including any permit required by PADEP. Fall 2026, CLPWC will seek rate increase to cover the cost of the PENNVEST funding. The parties will not oppose and will support the rate increase.

Summer 2027, CLPWC will begin construction of the second project, provided it receives the PENNVEST funding and the applicable permits for construction, including any permit required by PADEP. Fall 2027, CLPWC will seek rate increase to cover the cost of the PENNVEST funding. The parties will not oppose and will support the rate increase.

Summer 2028, CLPWC will begin construction of the third project, provided it receives the PENNVEST funding and the applicable permits for construction, including any permit required by PADEP. Fall 2028, CLPWC will seek rate increase to cover the cost of the PENNVEST funding. The parties will not oppose and will support the rate increase.

EXHIBIT
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Summer 2029, CLPWC will begin construction of the final project, provided it receives the PENNVEST funding and the applicable permits for construction, including any permit required by PADEP. Fall 2029, CLPWC will seek rate increase to cover the cost of the PENNVEST funding. The parties will not oppose and will support the rate increase.

CLPWC anticipates that each PENNVEST loan will be 20 years at 1% interest for the first 5 years and then at 1.75% for the balance of the 20 year loan. Under these rates, the amount of principle and interest due monthly on each loan will be approximately $30,000 a year. Although the Company has not done a rate study, using the current commercial/residential split under the base rate (70.5 residential/29.5 commercial - which may change), this would equate to a monthly rate increase in the range of $10-$11 per month for each $500,000 loan. Assuming four (possible 5) $500,000 loans, the residential rate increase for the improvements will be in the range of $40-$45 to $50 - $55 a month at the end of the improvements. We would anticipate that residential rate will increase by $10-$11 a year from 2026- 2029 for these projects. This would be exclusive of other potentially needed rate increases to offset increasing O&M costs. These amounts are obviously subject to change once the actual projects are identified and the costs are determined.

Responsible Witness: Todd Jospeh
Date: November 25, 2025

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