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June 15, 2026

**VIA ELECTRONIC FILING**

Matthew Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, Filing Room  
Harrisburg, PA 17120

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

Dear Secretary Homsher:

Enclosed for filing are Mainlines, Manholes & Wastewater Treatment Inc.'s ("MMWT") Supplemental Responses to TUS Data Request Set 1, Nos. A-7 and A-10.

If you have any questions, please contact me.

Respectfully,

*/s/ Kathryn Read-Fisher*

Whitney E. Snyder  
Kathryn C. Read-Fisher

*Counsel for  
Mainlines, Manholes & Wastewater Treatment Inc.*

KCR/das  
Enclosures

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

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

A-7. Please explain how properties in each portion of the Requested Territory receive water service (i.e., private wells, public water system, etc.).

**RESPONSE:** Properties located within the Imperial Point portion of the Requested Territory receive water service from Springhouse Waterworks, Inc. Properties within the Waypoint portion of the Requested Territory currently receive water service from Mainlines, Manholes & Wastewater Treatment, Inc., though that area is in the process of transitioning to service by Springhouse.

**PROVIDED BY:** Paul Christopher Luciano

**DATE:** November 21, 2025

**SUPPLEMENTAL RESPONSE:** The portion of the Requested Territory previously referred to as the Waypoint portion is the Hickory Hill Country Village Mobile Home Park portion of the Requested Territory. That portion of the Requested Territory is not being served by Springhouse Waterworks, Inc., and Mainlines no longer intends to transition that water service to Springhouse Waterworks, Inc. at this time.

Mainlines is preparing to submit a separate application to the Commission for authority to provide water service to the Hickory Hill Country Village Mobile Home Park portion of the Requested Territory.

**PROVIDED BY:** Paul Christopher Luciano

**DATE:** June 15, 2026

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

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

A-10. Please confirm whether Mainlines requires a Certificate of Public Convenience pursuant to Section 1101 or 1102(a)(1) of the Pennsylvania Public Utility Code, 66 Pa.C.S. §§ 1101 or 1102(a)(1), to own and/or operate water system facilities, including facilities identified in DEP Operation Permit No. 2503501-T1. If so, please specify when Mainlines will file this Application with the Commission. If not, please explain how Mainlines' services related to these facilities are not subject to Commission jurisdiction and provide the accounting procedures and agreements that define service terms, conditions, cost allocations, and cost recovery methods.

**RESPONSE:** DEP Operation Permit No. 2503501-T1 does not belong to, and is not owned or operated by, Mainlines. That permit was issued to Girard Borough for the operation of the Girard Borough public water system. The system provides water service to customers within the Borough, including Chardonnay Village, a manufactured home park located in Girard Borough. Mainlines has no ownership interest in, and does not operate, the facilities identified in that permit.

Mainlines is reviewing whether any additional Certificates of Public Convenience are needed related to its provision of service.

**PROVIDED BY:** Paul Christopher Luciano

**DATE:** February 25, 2026

**SUPPLEMENTAL RESPONSE:** Mainlines has reviewed its provision of water service to the Hickory Hill Country Village Mobile Home Park portion of the Requested Territory and has determined that it requires a Certificate of Public Convenience to provide that water service.

Mainlines is preparing to submit a separate application to the Commission for authority to provide water service to the Hickory Hill Country Village Mobile Home Park portion of the Requested Territory.

**PROVIDED BY:** Paul Christopher Luciano

**DATE:** June 15, 2026

**VERIFICATION**

I, Paul C. Luciano, \_\_\_\_\_, on behalf of Mainlines, Manholes & Wastewater Treatment, Inc., hereby state that the facts set forth in the foregoing document are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing in this matter. This verification is made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.



Name:

Title:

Mainlines, Manholes & Wastewater Treatment, Inc.