

COMMONWEALTH OF PENNSYLVANIA



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August 26, 2026

Via Electronic Filing

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

Re: Pennsylvania Public Utility Commission
v.
Conneaut Lake Park Water Corp., Inc.
Docket No. R-2026-3064386

Dear Secretary Homsher:

Attached for electronic filing, please find the Office of Consumer Advocate's Formal Complaint and Public Statement in this proceeding.

Copies have been served on the parties as indicated on the enclosed Certificate of Service.

Respectfully submitted,

/s/ Ryan Morden
Ryan Morden, Esq.
Assistant Consumer Advocate
PA Attorney I.D. # 335679
RMorden@paoca.org

Enclosures

cc: The Honorable Charles E. Rainey, Jr. (email only: crainey@pa.gov)
Office of Special Assistants (email only: ra-OSA@pa.gov)
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Certificate of Service

CERTIFICATE OF SERVICE

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2026-3064386
	:	
Conneaut Lake Park Water Corp., Inc.	:	

I hereby certify that I have this day filed electronically on the Commission's electronic filing system and served a true copy of the following document, the Office of Consumer Advocate's Formal Complaint and Public Statement, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant), in the manner and upon the persons listed below.

Dated this 26th day of August 2026.

SERVICE BY E-MAIL ONLY

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Dated: August 26, 2026

/s/ Ryan Morden

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Counsel for:
Darryl A. Lawrence
Consumer Advocate

FORMAL COMPLAINT
BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

1. COMPLAINANT

Darryl A. Lawrence, Consumer Advocate

555 Walnut Street, 5th Floor, Forum Place
Harrisburg, PA 17101-1923
Dauphin County

Phone: 717-783-5048

2. UTILITY NAME

Conneaut Lake Park Water Corporation, Inc.
Docket No. R-2026-3064386

3. TYPE OF UTILITY

Water

4. COMPLAINT

A. On August 7, 2026, Conneaut Lake Park Water Corporation, Inc. (CLPWC or Company) filed proposed Supplement No. 3 to its Water Service Tariff – Pa. P.U.C. No. 1 (Supplement No. 3) requesting to increase its rates for water service. The total increase is unclear, according to Supplement No. 3, the Company is proposing to increase water rates by an average of \$66,657 over a three year period, which it calculates to a 77.8% increase over current actual revenue. However, according to the Company's Statement of Reasons, it describes the rate increase as increasing rates for water service totaling an average of \$152,316 per year over the 3 year period. The rate increases are proposed to incrementally rise over the next 3 years for each customer class.

Using these incremental increases, the revenues in year one will be \$127,286; year two will be \$151,823, and in year three \$177,839. Rates would take effect on October 7, 2026.

B. CLPWC provides water service to approximately 166 customers, as of August 7, 2026. Two of the Company's customers are commercial, two are flat rate, while the remaining 162 customers are residential.

C. The Consumer Advocate is empowered to represent the interests of consumers before the Pennsylvania Public Utility Commission, pursuant to Act 161 of the Pennsylvania General Assembly, 71 P. S. Sections 309-1 *et seq*, as enacted July 9, 1976.

D. A preliminary examination of the Company's rate increase request indicates that the Company's present rates and proposed charges, increases and changes in rates, contained within the request are or may be unjust, unreasonable, and in violation of law; will or may allow the Company the opportunity to recover an excessive rate of return on its utility property investment, in violation of the Public Utility Code; will or may discriminate against certain customers, particularly seasonal residential customers; will or may compensate the Company for providing inadequate service to some or all of its customers; and otherwise may be contrary to sound ratemaking principles and public policy.

E. Furthermore, CLPWC filed its rate increase while the Commission is determining whether the Company can remain under current ownership in accordance with Section 529 of the Public Utility Code, where the OCA argued that the current Company is not a managerially, technically, and financially fit public utility, municipal corporation, or authority to own and operate CLPWC. *See Pa. PUC v. Conneaut Lake Park Water Corp., Inc.*, Docket Nos. P-2024-3051855, *et al.*, OCA Main Brief (May 27, 2026).

F. The Company is proposing to raise rates one time for three years, or implement a three-year phase in of rates:

	Current Rate	One time Flat Option	3 Year Incremental
Residential (monthly)	\$38.71	\$63.25	Yr. 1 - \$51.85 Yr. 2 - \$62.35 Yr. 3 - \$73.85
Comm Flat (monthly)	\$240	\$425	Yr. 1 - \$355 Yr. 2 - \$420 Yr. 3 - \$475
Meter Flat (monthly)	\$38.71	\$425	Yr. 1 - \$355 Yr. 2 - \$420 Yr. 3 - \$475
Meter Per 100 Gallons	\$1.29	\$2.25	Yr. 1 - \$2.10 Yr. 2 - \$2.35 Yr. 3 - \$2.55

G. The Company included a second table that expresses its proposed rate increase in terms of percentages:

	1 Year Option	3 Year Incremental
Residential (monthly)	63%	Yr. 1 - 34% Yr. 2 - 18% Yr. 3 - 15%
Comm Flat (monthly)	77%	Yr. 1 - 52% Yr. 2 - 16% Yr. 3 - 14%
Meter Flat (monthly)	998%	Yr. 1 - 843% Yr. 2 - 16% Yr. 3 - 14%
Meter Per 100 Gallons	74%	Yr. 1 - 32% Yr. 2 - 16% Yr. 3 - 11%

H. The OCA is investigating the basis for and calculation of estimated bill increases to ensure that they are consistent with applicable standards and will produce just and reasonable rates.

I. The Company is proposing a capital structure of 62.94% debt and 37.06% equity, with a ROE of 10%.

J. Whether rates are just and reasonable is inextricably intertwined with the quality of service provided. *Nat'l Utils. v. Pa. PUC*, 709 A.2d 972, 973 (Pa. Cmwlth. 1998). Therefore, all issues pertaining to the adequacy and reasonableness of a utility's service and facilities are relevant to whether a utility's existing or proposed rates are just and reasonable. 66 Pa. C.S. §§ 1301, 1501.

K. The Consumer Advocate files this Formal Complaint to ensure that the Company's requests are granted only to the extent they are found to be just and reasonable or otherwise compliant with applicable statutes, Commission regulations, or policy.

5. RELIEF

The Consumer Advocate respectfully requests that the Public Utility Commission:

A. Suspend and investigate the operation of the proposed tariff, pursuant to Section 1308(d) of the Public Utility Code, 66 Pa. C.S. Section 1308(d);

B. Consolidate all complaints filed against Tariff Supplement No. 3;

C. Hold full evidentiary hearings examining the reasonableness of the Company's requests;

D. Hold in-person public input hearings in the Company's service territory, or, alternatively, hold hearings virtually or by telephone, as may be needed to provide its customers with an opportunity to be heard on the record, if consumer interest arises;

E. Modify or reject the proposed rate increase and tariff changes which cannot be fully justified by the Company and shown to be just and reasonable and in the public

interest, or which are otherwise contrary to the Public Utility Code, sound ratemaking principles, and public policy; and

F. Grant any other relief deemed necessary.

6. VERIFICATION AND SIGNATURE

Verification:

I, Darryl A. Lawrence, hereby state that the facts above set forth are true and correct (or 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).

/s/ Darryl A. Lawrence
(Signature)

August 26, 2026
(Date)

7. LEGAL REPRESENTATION

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PUBLIC STATEMENT OF THE OFFICE OF CONSUMER ADVOCATE
PURSUANT TO 71 P.S. SECTION 309-4(e)

Act 161 of the Pennsylvania General Assembly, 71 P.S. Section 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (Commission). In accordance with Act 161, and for the following reasons, the Consumer Advocate determined to file a Formal Complaint and participate in proceedings before the Commission involving the current base rate filing made by Conneaut Lake Park Water Corporation, Inc. (CLPWC or Company).

The objective of the Consumer Advocate in this matter is to protect the interests of CLPWC's customers. According to a notice provided by the Company, it intends to increase rates as follows:

The Company has requested a three-year incremental rate increase for the monthly flat rate unmetered residential customers from \$38.71 to \$51.85 for the first year, from \$51.85 to \$62.35 for the second year, and from \$62.35 to \$73.85 for the third year. If the company's entire request is approved, the total bill for a residential customer would increase by 34% in the first year, 18% in the second year, and 15% in the third year.

The Company has requested a three-year incremental rate increase for the monthly flat rate unmetered commercial or industrial customer would increase from \$240 to \$355 per month for the first year, from \$355 to \$420 for the second year, and from \$420 to \$475 for the third year. This is an increase of 52% for the first year, 16% for the second year, and 14% for the third year.

The Company has requested a three-year incremental rate increase to the minimum charge for metered commercial and industrial customers from \$38.71 to \$355 for the first year, from \$355 to \$420 for the second year, and from \$420 to \$475 for the third year. This is an 843% increase for the first year, a 16% increase for the second year, and a 14% increase for the third year. This significant increase is due to a significant drop in usage from these customers since the last rate case.

Lastly, the Company has requested a three-year incremental rate increase to the charge per 100 gallons used for metered commercial and industrial customers [sic]. For customers who are metered based on usage, the cost per 100 gallons of water usage will increase from \$1.29 to \$2.10 in the first year, from \$2.10 to \$2.35 in the

second year, and from \$2.35 to \$2.55 in the third year. This is an increase of 32% for the first year, 16% for the second year, and 11% for the third year.

The Consumer Advocate has filed this Complaint with the Commission to ensure that each aspect of CLPWC's request is scrutinized and not approved unless shown to be fully justified in law, and consistent with the Public Utility Code and sound public policy.

The Company provides water service to approximately 166 customers. Two of the Company's customers are commercial, while the remaining 162 customers are residential. The Company provides water service to Conneaut Lake Park and the area immediately surrounding the Park in Conneaut Lake, Crawford County, Pennsylvania.