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March 19, 2019

*Via Electronic Filing*

Ms. Tanowa Troupe  
Docketing Division  
Public Utilities Commission of Ohio  
180 East Broad Street, 11<sup>th</sup> Floor  
Columbus, Ohio 43215-3793

**Re: Orwell-Trumbull Pipeline Company, LLC,  
Case Nos. 17-2424-PL-COI; 17-889-GA-AEC; 16-2419-GA-CSS;  
16-1726-PL-AIR; and 89-9019-PL-TRF**

Dear Ms. Troupe:

In *Richard M. Osborne, et al., v. Park View National Savings Bank n/k/a First National Bank of Pennsylvania*, Cuyahoga County Court of Common Pleas, Case No. CV 14-822810 (the "Receivership Case"), the Court appointed Zachary B. Burkons of Rent Due LLC as the receiver ("Receiver") for Orwell Trumbull Pipeline Company, LLC ("OTP"). On February 21, 2019, the Court: (1) authorized the Receiver to sell certain assets of OTP free and clear of all liens, encumbrances, and other interest including the PUCO regulated pipeline; and (2) approved the Receiver's proposed bidding and auction procedures.

Attached to this correspondence is the notice to sell OTP's assets. OTP's pipeline will be sold in accordance with the bid procedures approved by the receivership court.

Please contact me if you have any questions regarding this matter.

Sincerely,

Devin D. Parram

Attachment

**NOTICE OF RECEIVERSHIP SALE OF THE ASSETS OF  
ORWELL-TRUMBULL PIPELINE CO., LLC**

**Background:** Orwell-Trumbull Pipeline Co., LLC (“OTP”) is an intrastate natural gas company located in Ohio. OTP is a pipeline company under Ohio Revised Code Section (“R.C.”) 4905.03(F) and a public utility under R.C. 4905.02(A). OTP obtained approval from the Public Utilities Commission of Ohio (“PUCO”) to operate as a regulated public utility on March 16, 2005, and is currently regulated by the PUCO. OTP operates approximately 141 miles of pipeline, all within the State of Ohio. OTP provides natural gas transportation service to natural gas customers in Portage, Geauga, and Lake Counties in northeastern Ohio. The majority of the pipeline was constructed in the early 2000s.

**Receivership proceeding:** In *Richard M. Osborne, et al., v. Park View National Savings Bank n/k/a First National Bank of Pennsylvania*, Cuyahoga County Court of Common Pleas, Case No. CV 14-822810 (the “Receivership Case”), the Court appointed Zachary B. Burkons as the receiver (“Receiver”) over the property and assets of OTP. On February 21, 2019, the Court (1) authorized the Receiver to sell certain assets of OTP’s free and clear of all liens, encumbrances, and other interests; and (2) approved the Receiver’s proposed bidding and auction procedures.

**Asset Description:** The following OTP assets are being sold as part of the process:

1. **Real Property:** 3511 Lost Nation Road, Willoughby, Ohio 44094 (Parcel # 27B-044-0-0025)
2. **Pipeline:** 141 Miles – 52 miles of 8” coated steel (.312 wall thickness); 34 miles of 4” coated steel (.188 wall thickness); and 55 miles of 2” coated steel (.154 wall thickness)

**Bidding and auction procedure:** The Receiver developed bid procedures that are designed to maximize recovery to the Receivership estate. The bidding procedures describe, among other things: (1) the bid deposit requirements; (2) requirements for submission of an irrevocable asset purchase agreement; (3) proof of financial and operational ability to perform; (4) the process for obtaining access to OTP’s data room; (6) the manner for submission of bids, (7) the process for determining qualified bids; and (8) and the process for the selecting of qualified bids. If the Receiver receives multiple qualified bids, the Receiver may hold an auction to select the potential purchaser. The bidding and auction procedures were approved by the Court on February 21, 2019. **A full copy of the bidding and auction procedures can be obtained at: [www.rentduellc.com/otp](http://www.rentduellc.com/otp).**

**Bidding deadline:** Any person or entity interested in submitting a bid for the purchase of certain assets of OTP must submit a qualified bid to Richard Bain at Myers, Roman, Friedberg, & Lewis 28601 Chagrin Boulevard, Suite 600, Cleveland, Ohio 44122 ([rbain@myersroman.com](mailto:rbain@myersroman.com)) and Devin Parram at Bricker & Eckler LLP, 100 South Third Street, Columbus, Ohio 43215 ([dparram@bricker.com](mailto:dparram@bricker.com)). All qualified bids must be submitted by May 1, 2019 at 5:00 p.m. (prevailing Eastern Time).

**As Is,Where Is:** The Sale of the Assets shall be on an “as is, where is” basis and without representations or warranties of any kind, nature, or description by the Receiver or his agents except to the extent set forth in the Purchase Agreement. Each Qualified Bidder shall be deemed to acknowledge and represent that it has had an opportunity to conduct any and all due diligence regarding the Assets prior to making its offer, that it has relied solely upon its own independent review, investigation and/or inspection of any documents and/or the Assets in making its Bid.

**Questions regarding the bidding process:** For questions regarding the bidding and auction process, contact Richard Bain, counsel for the Receiver, at (216) 831-0042.

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**3/19/2019 4:17:50 PM**

**in**

**Case No(s). 17-2424-PL-COI, 17-0889-GA-AEC, 16-2419-GA-CSS, 16-1726-PL-AIR, 89-9019-PL-TRF**

Summary: Notice of Zachary B. Burkons of Rent Due LLC Receiver Sale of OTP Assets  
electronically filed by Teresa Orahoad on behalf of Devin D. Parram