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January 8, 2016

RECEIVED

JAN 8 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Via Overnight Federal Express

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street – Filing Room
2nd Floor North
Harrisburg, PA 17105

**Re: Pennsylvania Public Utility Commission Bureau of Investigation and
Enforcement v. PECO Energy Company; Docket No. C-2015-2514773**

Dear Secretary Chiavetta:

Enclosed for filing is the Notice to Plead and Answer and New Matter of Respondent, PECO Energy Company in the above-referenced case. Copies have been served on the parties of record in accordance with the Certificate of Service.

If you have any questions on this matter, please call me at 215-569-5793.

Sincerely,



CHRISTOPHER A. LEWIS

CAL:as
Enclosures
cc: As per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,
Bureau of Investigation and Enforcement,
Complainant

v.

PECO Energy Company,
Respondent

Docket No. C-2015-2514773

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

NOTICE TO PLEAD

Pursuant to 52 Pa. Code §§ 5.63(a) and (b), you are hereby notified that, if you do not file a written response denying or correcting the enclosed NEW MATTER of PECO Energy Company within 20 days from service of this notice, a decision may be rendered against you. All pleadings, such as a Reply to NEW MATTER, must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy served to counsel for PECO Energy Company, and where applicable, the Administrative Law Judge presiding over the issue.

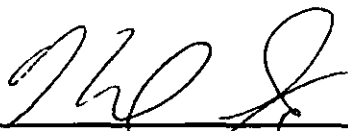
File with:

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Second Floor
Harrisburg, PA 17120

With a copy to:

Michael S. Swerling, Esq.
PECO Energy Company
2301 Market Street, S23-1
Philadelphia, PA 19101-8699

Dated: January 8, 2016


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**BEFORE THE
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Pennsylvania Public Utility Commission, :
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**ANSWER & NEW MATTER OF RESPONDENT,
PECO ENERGY COMPANY**

On November 25, 2015, PECO Energy Company (“PECO”, the “Company” or the “Respondent”) was served with a Formal Complaint (the “Complaint”) filed by the Pennsylvania Public Utility Commission’s (the “Commission’s” or the “PUC’s”), Bureau of Investigation and Enforcement (“I&E”) in the above-captioned docket. On December 14, 2015, the Commission granted PECO an extension of time to answer the Complaint, providing a deadline of January 8, 2016. PECO, by its undersigned counsel, and pursuant to 52 Pa. Code §§ 5.61(a) and 5.62(b), hereby submits this Answer and New Matter in response to the Complaint.

I&E’s Complaint seeks to hold PECO to a standard that exceeds existing federal and state requirements and unfairly shifts duties, set forth in the PA One Call Law,¹ from third-party excavator to facility owner (i.e., PECO). I&E takes this approach to remedy a third-party excavator’s failure to comply with its duties under the PA One Call Law (to submit a locate

¹ Pennsylvania’s Underground Utility Line Protection Law, PA Act 287 of 1974, as amended by Act 121 of 2008, 73 P.S. 176 *et. seq.* (the “PA One Call Law” or the “Act”).

request² through the One Call System before excavating). I&E's request is not in the public interest and should be avoided because the end-result would: 1) increase liabilities and costs borne by natural gas distribution companies ("NGDCs") (and ultimately their customers); 2) diminish the accountability of excavators to operate safely around utility equipment; and 3) encourage negligent, careless and reckless behavior by excavators.

I. The Complaint Is Inconsistent with Federal and State Law and Constitutes Regulatory Overreach.

The Complaint is an improper, unprecedented and unwise attempt to rewrite the PA One Call Law by imposing wide-ranging, costly and unreasonable new duties on NGDCs (duties that currently apply to excavators under the PA One Call Law).³ According to I&E, PECO's Gas Damage Prevention procedure should require PECO to anticipate excavators' negligence, carelessness and recklessness by including requirements to: (1) continuously monitor construction projects; (2) verify that excavators have submitted PA One Call locate requests before excavating; and (3) proactively relocate underground facilities at PECO's and its customers' expense when excavation occurs in the vicinity of those facilities. PECO is concerned with this approach because it contradicts the existing PA One Call Law and disincentivizes excavators from complying with their duties under the Act. Regardless, I&E's Complaint proposes to hold PECO to a higher standard than is required by the PA One Call Law and the federal gas safety regulations. By requiring PECO to have an enhanced damage

² A "locate request" is defined under the Act as "a communication between an excavator or designer and the One Call System in which a request for locating facilities is processed. . . ." 73 P.S. § 176. Upon receipt of a locate request, the PA One Call System generates a ticket which is provided to the facility owner.

³ The PA One Call Law defines "excavator" as any person who or which performs excavation or demolition work for himself or for another person. 73 P.S. § 176. For purposes of this Answer, an excavator is not an employee, agent, contractor or subcontractor of PECO.

prevention procedure in anticipation that excavators will not fulfill their duties under the Act (i.e., to submit a locate request through the PA One Call System before excavating), I&E is shifting the duty and liability for making such requests from excavator to PECO.

More specifically, on August 7, 2013, Eastern Caisson Corporation (“Eastern Caisson”), a subcontractor hired by Robert Foss Electric (“Foss Electric”), struck and damaged a 4-inch gas main owned and operated by PECO, while drilling to install light poles as part of an athletic facility construction project at Rosemont College in Rosemont, Pennsylvania (the “incident”). No PA One Call request was submitted by Eastern Caisson. More importantly, no PA One Call request was submitted prior to the incident by *any* excavator covering the scope of work performed by Eastern Caisson to install light poles and excavate at a 14-foot depth. Additionally, Eastern Caisson’s work scope was never communicated to PECO.

Prior to the incident, a total of 17 locate requests and 2 design requests were properly submitted by other entities in connection with excavation and design work at the site. PECO’s contractor, USIC, Inc. (“USIC”), properly marked the Company’s facilities for all 17 locate requests made by 7 different excavators during the term of the Rosemont College project.⁴ In July 2013, PECO conducted 7 inspections of the main that was ultimately damaged by Eastern Caisson. On July 9, 2013, USIC installed four permanent marker posts over the main before the incident occurred to indicate the location of the main that was struck. Despite PECO’s responses to all 19 One Call requests and the installation of permanent marker posts, a subcontractor working on the Rosemont College site struck PECO’s main. After the incident, PECO, accompanied by PUC inspectors, confirmed that the permanent marker posts, which accurately identified the location of the main struck by Eastern Caisson, were visible at the time of the

⁴ Design requests do not require onsite marking of facilities.

incident. In fact, the permanent marker posts were nearby and in plain view from the location of the incident.

The Complaint is premised on I&E's flawed and unsupportable contention that PECO was obligated to act to prevent the August 7, 2013 incident in the absence of a PA One Call request. However, PECO has no duty to prevent an excavator from violating the PA One Call Law. At all times during the Rosemont College project, PECO followed its Gas Damage Prevention procedure, which complies with the federal requirements for a damage prevention program at 49 C.F.R. § 192.614. Accordingly, PECO participated in a qualified one-call system and relied on excavators to comply with the PA One Call Law (i.e., by submitting a locate request before digging). A locate request triggers the applicable damage prevention safeguards in PECO's procedure. But with the benefit of perfect hindsight, I&E now claims that PECO could have taken a number of additional actions to anticipate the excavator's negligence, carelessness and recklessness, including, but not limited to: (1) continuously monitoring the project; (2) verifying that the excavator submitted the required PA One Call locate request; and (3) proactively relocating the main at PECO's and its customers' expense.

However, none of the duties that I&E seeks to impose on PECO are required by the applicable federal regulations, the Pennsylvania Code, the PA One Call Law or PECO's own policies and procedures. Nor has I&E taken account of the costs and burdens associated with undertaking such duties. Most importantly, the Commission may not impose such duties where the General Assembly, in the PA One Call Law, has expressly created a statutory scheme that places the pertinent duties, and the liabilities associated with them, on excavators.

The Pennsylvania Supreme Court, in *Excavation Technologies, Inc. v. Columbia Gas Co. of Pa.*, 985 A.2d 840 (Pa. 2009), declared that excavators, not facility owners, have the duty to

identify the precise location of facilities, and if that duty were imposed on utilities instead of excavators, the costs would inevitably be passed on to consumers, which is a path the Legislature expressly declined to follow:

Further, excavators, not utility companies, retain the duty to identify the precise location of facilities. To this end, the Act provides where a utility supplies an excavator with “insufficient information” to locate facilities, the excavator must employ prudent techniques, which may include hand-dug test holes, to determine the precise location of underground equipment. *See id.*, § 177(5)(i). . . .

. . . [E]xcavators . . . are in the best position to employ prudent techniques on job sites to prevent facility breaches. *See id.*, § 177(5)(i). . . . [I]f utility companies are exposed to liability for excavators’ economic losses, such costs would inevitably be passed on to the consumer; if this is to be done, the legislature will say so specifically. . . . [citation omitted].

Id. at 844.

The novel approach advanced by I&E undercuts the goal of the PA One Call Law to protect public health and safety by confusing the duties that are now clearly defined in the Act. Doing so would *diminish* the accountability of excavators and *encourage* the behavior that the Act is designed to prevent: excavating without submitting a locate request to the Pennsylvania One Call System! Indeed, the one certain way to avoid these incidents in the future is to uphold the PA One Call Law’s fundamental mandate, which is continuously broadcasted all throughout this Commonwealth: “Call Before You Dig.” For these reasons, and as explained further below, PECO respectfully requests that I&E’s Complaint be dismissed with prejudice.

PECO responds to the correspondingly numbered paragraphs in the Complaint as follows.

II. Parties and Jurisdiction

1. Admitted.

2. Admitted.

3. Admitted.

4. Admitted in part and denied in part. The Respondent's name of incorporation is PECO Energy Company. The Respondent provides electric and natural gas distribution service to customers in its certificated service territory.

5. Admitted.

6. Admitted.

7. Admitted.

8. Admitted.

9. Admitted.

10. Admitted.

11. Denied as stated. While the Commission has jurisdiction to enforce the *Pennsylvania Public Utility Code*, the legal duties of NGDC facility owners and excavators with regard to underground utility line protection are defined by the PA One Call Law and are enforced by the Department of Labor and Industry.⁵ The General Assembly placed on each excavator, who intends to perform excavation or demolition work within the Commonwealth, the following legal duties:

- a. The duty to request the location and type of facility owner lines at each site by notifying the facility owner through the One Call System. 73 P.S. § 180(2.1);
- b. In a complex project or if an excavator intends to perform work at multiple sites or over a large area, the duty to take reasonable steps to work with facility owners, including scheduling and conducting a preconstruction meeting, so that they may locate their facilities at a time

⁵ The Fines and Penalty Section (7.2(a)) of the PA One Call Law authorizes the Department of Labor and Industry, in consultation with the Attorney General, to enforce provisions of the Act in any court of competent jurisdiction. 73 P.S. § 182.2(a).

reasonably in advance of the actual start of excavation or demolition work for each phase of the work. 73 P.S. § 180(3); and

- c. The duty to exercise due care and to take all reasonable steps necessary to avoid injury to or otherwise interfere with all lines, including, where insufficient information is available, the duty to employ prudent techniques, which may include hand-dug test holes, vacuum excavation, or other similar devices, to ascertain the precise position of the facilities. 73 P.S. §§ 180(4), (5), (15).

The subject matter of the Complaint is an incident where the excavator failed to perform each of the legal duties assigned to it by the PA One Call Law.

Similarly, the General Assembly placed on each facility owner the following legal duties:

- a. Not more than ten business days after receipt of a request from a designer who identifies the site of excavation or demolition work for which he is preparing a drawing, to initially respond to his request for information as to the position and type of the facility owner's lines at such site based on the information currently in the facility owner's possession or to mark the plans which have been provided to it by the designer by field location or by another method agreed to by the designer, excavator and facility owner, or their agent. The facility owner shall so advise the person making the request of the facility owner's status at the site through the One Call System. 73 P.S. § 177(4).
- b. After receipt of a timely request from an excavator or operator who identifies the site of excavation or demolition work he intends to perform and not later than the business day prior to the scheduled date of excavation:

To mark, stake, locate or otherwise provide the position of the facility owner's underground lines at the site within eighteen inches horizontally from the outside wall of such line in a manner so as to enable the excavator, where appropriate, to employ prudent techniques, which may include hand-dug test holes, to determine the precise position of the underground facility owner's lines. This shall be done to the extent such information is available in the facility owner's records or by use of standard locating techniques other than excavation. Standard locating techniques shall include, at the utility owner's discretion, the option to choose available technologies suitable to each type of line or facility being located at the site, topography or soil conditions or to assist the facility owner in locating its lines or facilities, based on accepted engineering and operational practices. Facility owners shall make reasonable efforts during the excavation phase to locate or notify excavators of the existence and

type of abandoned lines that remain on the continuing property records of the facility owners. 73 P.S. § 177(5)(i).

- c. After receipt of a timely request from an excavator or operator who identifies the site of excavation or demolition work he intends to perform and not later than the business day prior to the scheduled date of excavation:

To respond to all notices through the One Call System, provided the request is made in the time frame set forth under this act. The response shall be made not later than the end of the second business day following receipt of the notification by the One Call System, excluding the business day upon which the notification is received, or not later than the day prior to the scheduled date of excavation if the excavator specifies a later date or, in the case of an emergency, to respond through the One Call System as soon as practicable following receipt of notification of the emergency by the One Call System. 73 P.S. § 177(5)(v).

PECO did not violate any of the legal duties assigned to it by the PA One Call Law, nor does public policy support shifting the duties created by the PA One Call Law from excavator to facility owner.

III. Background

12. Admitted in part and denied in part. The allegations in Paragraph 12 of the Complaint are admitted, except that the contractual relationships between the parties involved were as follows:

- Rosemont College hired Dale Construction to serve as the general contractor for the construction of an athletic facility.
- Foss Electric was the electrical contractor for Dale Construction.
- Eastern Caisson was the subcontractor for Foss Electric.
- Eastern Caisson was hired to install light poles for an athletic field.
- A number of additional contractors and subcontractors conducted excavation activities at the site for Rosemont College.

13. Admitted in part and denied in part. It is admitted that contractors working on Rosemont College's project placed backfill over PECO's facilities causing them to be buried at a depth of approximately 14 feet at the time of the incident. While this occurred, it did not cause an unsafe condition, nor was it a proximate cause of the August 7, 2013 incident. To the contrary, the August 7, 2013 incident occurred because of Eastern Caisson's negligence, carelessness and recklessness in excavating: 1) without submitting a locate request; 2) without using prudent techniques to locate the utility line; 3) in violation of multiple provisions of the PA One Call Law; and 4) in violation of the Occupational Safety and Health Act ("OSH Act") regulations at 29 C.F.R. § 1926.651(b)(2), which require employers to contact and advise utility companies of proposed excavation work before initiating that work.

14. Admitted.

15. Admitted.

16. Admitted.

17. Denied. PECO avers that three contractor employees were working near the ignition site. Two were taken to the hospital as a precaution and were released the same day. The third refused medical treatment.

18. Admitted.

19. Admitted.

20. Admitted.

21. Admitted.

22. Denied as stated. A true and correct summary of the PA One Call tickets received for the Rosemont College construction project is attached hereto as Exhibit C. Additionally, true and correct copies of the actual PA One Call tickets received, and the responses thereto, for the

Rosemont College construction project are attached hereto as Exhibit D. PECO denies that any locate request was received for the light pole installation activities that resulted in the incident on August 7, 2013. To the contrary, while PECO received 19 design and locate requests for the overall construction site, none of the requests related to the scope of work of installing light poles; none related to the depth of excavation involved in installing the light poles; and none were submitted by Eastern Caisson or on Eastern Caisson's behalf. Eastern Caisson excavated: 1) without submitting a locate request; 2) without using prudent techniques to locate the utility line; 3) in violation of multiple provisions of the PA One Call Law; and 4) in violation of the OSH Act regulations at 29 C.F.R. § 1926.651(b)(2).

23. Denied as stated. No locate request related to the incident is identified in the Complaint. PECO received locate requests for *other* excavation work performed by *other* excavation contractors on the project, but those requests in no way covered the work that was performed by Eastern Caisson. See Exhibits C, D. Additionally, PECO properly marked its facilities, where necessary, in response to every locate request received for the Rosemont College project. See Exhibits C, D.

24. Denied as stated. The July 12, 2013 and July 16, 2013 locate requests were submitted by Cavan Construction Co., Inc. and had nothing to do with the work performed by Eastern Caisson or the Rosemont incident. While these locate requests listed the duration of Cavan Construction Co, Inc.'s excavation as three months, that excavation involved a different area of the project site, a different depth and work performed by a different contractor. See Exhibit D. These locate requests, like all locate requests, must be considered as separate and distinct excavations.

25. Denied as stated. PECO admits that for PA One Call Identification Numbers 20111682524 and 20130071986, it left an interim KARL response of “conflict, lines nearby.” Furthermore, PECO avers that USIC’s KARL responses (“Conflict. Lines Nearby.”) were appropriate for these types of One Call requests, which were design in nature. A KARL response of “Conflict. Lines Nearby” is a valid KARL response recognized by the PA One Call Users Guide⁶ and the PA One Call System, which includes this as a prepopulated option to complete the design request. There was no need or requirement for PECO to mark its facilities during this preliminary design phase.

26. Denied as stated. PA One Call No. 20132200925 covered the scope of work of “drilling hole posts” and was submitted by Foss Electric on August 16, 2013 (nine days after the incident). First, this request, which was submitted after the incident, in no way caused the incident.

Second, this locate request was to mark-out the new main that was installed to replace the main that was damaged by Eastern Caisson. The ticket for this request, attached as part of Exhibit D, states: “Caller states there is a new line at the site that is not marked”

Third, while PECO admits that USIC left a KARL response of “Not Marked – Due to No Access,” this response was made in error. USIC has informed PECO that the line was in fact marked in response to this request but that USIC unintentionally entered an incorrect response in the KARL system. Furthermore, PECO denies that this response in any way contributed to the August 7, 2013 incident.

27. Denied. After reasonable investigation, PECO lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 27 of the

⁶ Indeed, in its Relief Requested, I&E requests that PECO be ordered to modify its Gas Damage Prevention procedure to be consistent with the PA One Call Users Guide.

Complaint. Accordingly, those allegations are denied. By way of further answer, PECO avers that its facilities for Rosemont College were accurately mapped and marked. USIC visited Rosemont College multiple times in response to locate requests submitted by contractors working on the project, and accurately marked the gas main, where necessary, in response to those locate requests. In addition, PECO's Damage Prevention Inspector installed permanent marker posts on the site to alert all contractors of the location of the gas main. The marker posts were visible on August 7, 2013, when Eastern Caisson began drilling. True and correct copies of photographs taken on August 8, 2013, depicting the permanent marker posts, are attached hereto as Exhibit F. The photographs in Exhibit F illustrate that the marker posts were nearby in plain view from where Eastern Caisson was drilling when the incident occurred. Additionally, true and correct copies of two maps depicting the area of the Rosemont College construction project before and after the August 7, 2013 incident are attached hereto as Exhibit G.

By way of further answer, PECO avers that, at all times relevant to the Rosemont College project, it fully complied with its duties under the PA One Call Law. The only reason that the August 7, 2013 incident occurred is because Eastern Caisson acted negligently, carelessly and recklessly by failing to submit a locate request and exercise reasonable care as required by the PA One Call Law.

28. *Denied as stated.* PECO admits that it used marker balls at the site, but these marker balls are not intended to be used by excavators. Instead, they are used by PECO's locating contractor, USIC, to accurately locate and mark underground facilities. At the time of the incident on August 7, 2013, five marker balls existed under the permanent marker posts that accurately identified the location of the main.

29. Admitted in part and denied in part. PECO expressly denies I&E's contention that PECO was not using any procedure to install marker balls. The marker balls used by PECO at the construction site are called "iD Ball Markers" which are a product of 3M Dynatel ("3M"). The marker balls contain a radio-frequency identification ("RFID") chip and are buried in the ground to help accurately locate PECO's underground facilities. The marker balls can be identified using a 3M Electronic Marking System ("EMS") receiver called EMS-iD Locator 1420. PECO maintained and relied upon the marker ball standards and specific operations parameters found in the following 3M documents: 3M EMS iD Ball Marker Installation Instructions; 3M Dynatel EMS-iD Locator 1420 Operators Manual; and 3M Dynatel 1420 EMS-iD Marker Locator - Marker Locating Quick Reference Guide. True and correct copies of these 3M documents are attached hereto as Exhibit I.

At the time of the incident, PECO was still studying and testing the use of marker balls. PECO has since developed an internal standard that has essentially incorporated the standards and instructions contained in the 3M documents at Exhibit I. A true and correct copy of PECO's marker ball standard is attached hereto as Exhibit J. PECO denies that the lack of an internal standard for marker balls at the time of the incident caused or relates to the incident, particularly where PECO still relied on essentially the same standard as in the 3M documents at Exhibit I.

30. Denied as stated. In addition to mark-outs by USIC, PECO's Damage Prevention Inspector conducted site visits in response to locate requests submitted by excavators performing work on the site. *See Exhibit E for the records of each inspection.* No locate request was submitted for the work being performed by Eastern Caisson, and consequently PECO's Damage Prevention Inspector could not perform an inspection of the Eastern Caisson excavation prior to the incident on August 7, 2013.

31. Denied as stated. The PA One Call Law places on the excavator, not the facility owner, the legal duty to schedule a preconstruction meeting, if necessary. *See* 73 P.S. § 180(3). Dale Corporation did not make any PA One Call requests and did not schedule any meetings with PECO to discuss excavation work. PECO denies that there is any requirement that it meet with the General Contractor, who hired an electrical subcontractor (Foss Electric), who then hired an excavator (Eastern Caisson).⁷

32. Denied as stated. There was only one gas main at Rosemont College. Portions of the site were re-graded by various contractors or sub-contractors. By August 7, 2013, the grade at the location of the incident had been raised so that the main was located approximately 14 feet below grade. This was done without PECO's knowledge, consent, or approval. PECO does not have a maximum depth requirement for its gas mains. Accordingly, the 14 foot depth is within PECO's construction standards.

33. Denied. PECO denies that its main was located at a depth far beyond Company standards and unreachable with normal excavation equipment. PECO does not have a maximum depth requirement for its gas mains. Accordingly, the 14 foot depth is within PECO's construction standards.

34. Denied as stated. While concrete stairs were present at the time of the August 7, 2013 incident, the location of the concrete stairs did not contribute to the August 7, 2013

⁷ Indeed, Foss Electric hired Eastern Caisson on the morning of the incident (Wednesday, August 7, 2013) to perform the excavation that caused the line strike. The PA One Call Law requires excavators to provide three business days' notice to utilities, but not more than ten business days prior to the start of excavation. 73 P.S. § 180(2.1). The first lawful start date for an excavation is determined by the scheduled excavation date in the One Call request. Excavation work cannot begin prior to the first lawful start date but no later than 10 business days from the day of the One Call request. Therefore, the earliest lawful date by which Eastern Caisson could have excavated if it had made a locate request would have been Monday, August 12, 2013.

incident. Furthermore, the concrete stairs provided no safety or access concerns that required PECO to relocate its facilities.

35. *Admitted in part and denied in part.* PECO admits that it was onsite numerous times during the construction project. PECO specifically denies that the main needed to be relocated as a result of the Rosemont College project generally, the Rosemont incident, the depth of the main, the concrete stairs or any other reason. The main remained in place and in operation until the time of the incident on August 7, 2013 when it was squeezed off. PECO avers that, after the incident, it installed a new section of the main in a different location for the convenience of PECO and its customers. Furthermore, had Eastern Caisson excavated according to PECO's permanent marker posts, the main would not have been compromised in its existing location.

36. *Denied.* After reasonable investigation, the Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 36. Accordingly, those allegations are denied. However, PECO avers that, at the time of the incident, its Gas Damage Prevention procedure, GO-PE-9003, Revision No. 2, adequately complied with existing federal and state requirements and was not out-of-date.⁸

37. *Denied.* PECO specifically denies that it did not follow its Gas Damage Safety procedure. I&E has misread and misconstrued PECO's Gas Damage Prevention procedure. PECO's Gas Damage Prevention procedure complies with the PA One Call Law in that preventive actions are taken after receipt of a timely PA One Call request. Because no PA One Call request was submitted for the light pole installation work, the requirements under PECO's Gas Damage Prevention procedure was not triggered for that work. PECO followed its Gas

⁸ Unless otherwise indicated, all references to PECO's Gas Damage Prevention procedure in the Answer and New Matter refer to Revision No. 2 of PECO's Gas Damage Prevention procedure, GO-PE-9003.

Damage Prevention procedure at all times during the Rosemont College construction project, which allowed the Company to safely respond to all 19 One Call requests received.

38. Denied. PECO denies I&E's contention that the construction site qualified as a high profile job because it involved major construction, use of marker balls to locate the main, installation of pipeline markers and the removal of the reference road. I&E has misread and misconstrued PECO's Gas Damage Prevention procedure. PECO's Gas Damage Prevention procedure, Exhibit A, provides guidelines for PECO's locator to identify high profile excavations, if needed. As noted above, PECO received no locate request for the work performed by Eastern Caisson, so the "High Profile" provisions of the Gas Damage Prevention procedure is wholly irrelevant to this incident.

39. Denied as stated. There was no PA One Call ticket covering the entire site, therefore, PECO's Gas Damage Prevention procedure neither required nor permitted PECO to mark the job as high profile.

40. Denied. I&E has misread and misconstrued PECO's Gas Damage Prevention procedure. Because no PA One Call request was submitted for the light pole installation work, the requirements under PECO's Gas Damage Prevention procedure was not triggered for that work. For a further explanation, see PECO's response to Paragraph 38.

41. Denied as stated. While PECO admits that the Writer, Reviewer, Technical Approver, Safety Approver, UFAM Approver or Reason Written were not named in Revision No. 2 of GO-PE-9003, PECO expressly denies that by not listing this information in Revision No. 2 the procedure is rendered "incomplete." Furthermore, PECO expressly denies that the lack of this information related in any way to the August 7, 2013 incident. Indeed, in *Revision No. 3* of GO-PE-9003, PECO did subsequently identify the writer (Maureen Ludwick) and reviewers

(Rob Bedics, Dave Haverstick, Joe Beerley) of Revision No. 2, as well as the reason for writing Revision No. 2 (“Periodic review”). A true and correct copy of PECO’s Gas Damage Prevention procedure, GO-PE-9003, Revision No. 3 is attached hereto as Exhibit B.

42. Denied as stated. While PECO admits that, at the time of the incident, PECO Administrative Procedure GO-PE-9003-Gas Damage Prevention, Revision No. 2, had been last reviewed internally by PECO on April 26, 2013 and that USIC was PECO’s PA One Call locator at the time of the August 7, 2013 incident, PECO expressly denies I&E’s contention that “several key changes within the document were not made” and expressly denies any implication that the change from STS, Inc. (“STS”) to USIC in any way contributed to the August 7, 2013 incident. To the contrary, during the course of the project, USIC adequately responded to all PA One Call requests at the site in accordance with all applicable laws, regulations and PECO’s Gas Damage Prevention procedure. The August 7, 2013 incident occurred because the excavator, Eastern Caisson, failed to fulfill its legal duties under the PA One Call Law to submit a locate request and, in the absence of sufficient information, to exercise reasonable care in conducting its work. By way of further response, PECO states the Gas Damage Prevention procedure were subsequently revised to reference USIC instead of STS. See Exhibit B.

43. Denied as stated. While PECO admits that STS, rather than USIC, is referenced on pages 4, 18, 19, 20, 23, 28-31 and 33-34 of Revision No. 2 of GO-PE-9003, PECO denies the contentions in Paragraph 43 of I&E’s Complaint to the extent that they were intended to apply to subsequent versions of GO-PE-9003. Furthermore, PECO expressly denies that including STS instead of USIC in Revision No. 2 had anything to do with the August 7, 2013 incident. The locating contractor, USIC, adequately responded to all PA One Call requests at the site in accordance with all applicable laws, regulations and PECO’s Gas Damage Prevention procedure.

IV. Alleged Violations

COUNT ONE

44. All responses in paragraphs 1-43 are incorporated as if fully set forth herein.

45. Denied. The allegations in Paragraph 45 are conclusions of law to which no response is required. By way of further response, PECO denies that it failed to carry out a written program to prevent damage to a buried pipeline from excavation activities under 49 C.F.R. § 192.614(a) and 52 Pa. Code § 59.33(b). PECO also denies that it failed to follow its Gas Damage Prevention procedure, section 4.2.1.1, found in GO-PE-9003, Revision No. 2. Moreover, the PA One Call Law places the duty on the excavator, not PECO, to initiate a preconstruction meeting:

In a complex project or if an excavator intends to perform work at multiple sites or over a large area, he shall take reasonable steps to work with facility owners, including scheduling and conducting a preconstruction meeting, so that they may locate their facilities at a time reasonably in advance of the actual start of excavation or demolition work for each phase of the work.

73 P.S. § 180(3).

By way of further response, section 4.2.1 of PECO's Gas Damage Prevention procedure, not section 4.2.1.1, requires pre-excavation meetings to be conducted on an as-needed basis with excavators. Section 4.2.1.1 requires pre-construction studies and planning for activities involving blasting, tunneling, explosive demolitions, large excavations, foundation work, underground tank removal, etc. I&E has misread and misconstrued PECO's Gas Damage Prevention procedure. The procedure does not state that pre-excavation meetings will occur when large excavations and foundation work could impact facilities. I&E incorrectly presumes without any factual support that a pre-excavation meeting would have prevented the Rosemont incident. However, Eastern Caisson needed to make a One Call request before any

determination as to the necessity of a pre-excavation meeting could be made. The lack of a pre-excavation meeting did not cause or contribute to this this incident; Eastern Caisson's failure to utilize the PA One Call System prior to digging caused the incident.

COUNT TWO

46. All responses in paragraphs 1-45 are incorporated as if fully set forth herein.

47. Denied. The allegations in Paragraph 47 are conclusions of law to which no response is required. By way of further response, PECO denies that it failed to carry out a written program to prevent damage to a buried pipeline from excavation activities under 49 C.F.R. § 192.614(a) and 52 Pa. Code § 59.33(b). PECO further denies that it failed to follow its Gas Damage Prevention procedure, section 5.6.3, found in GO-PE-9003, Revision No. 2.

According to section 5.9.1.4 of the Gas Damage Prevention procedure, PECO's locating contractor identifies high profile tickets. After a particular PA One Call request is identified as high profile, section 5.6.3 requires PECO's Damage Prevention Inspectors to consider a number of factors in determining the need for and extent of audits/inspections.⁹ I&E incorrectly presumes without any factual support that an inspection would have prevented the Rosemont incident. However, Eastern Caisson needed to make a One Call request before any

⁹ PECO's Damage Prevention Inspectors consider the factors listed in section 5.6.3 of the Gas Damage Prevention procedure in determining the need for and extent of audits/inspections for high profile PA One Call requests. These factors include:

- The type and duration of the excavation activity involved
- The proximity to the operator's facilities
- The type of excavating equipment involved
- The importance of the operator's facilities
- The type of area in which the excavation activity is being performed
- The potential for a serious incident should damage occur
- The past experience of the excavator
- The potential for damage occurring that may not be easily recognized by the excavator, such as improper support during excavation and backfill
- The potential for facility markings to become obscured

determination as to the necessity of an inspection could be made. The lack of an inspection did not cause or contribute to this this incident; Eastern Caisson's failure to utilize the PA One Call System prior to digging caused the incident.

Additionally, the prudent excavator would have *easily recognized* the potential for damage inherent in drilling to install the light poles at the location of the incident based on the existence of visible marker posts and if prudent techniques were used to locate the main, as required by the PA One Call Law. In fact, the prudent excavator would have *known* the potential for damage inherent in drilling to install the light poles at the location of the incident because the prudent excavator would have submitted a PA One Call locate request.

COUNT THREE

48. All responses in paragraphs 1-47 are incorporated as if fully set forth herein.

49. Denied. The allegations in Paragraph 49 are conclusions of law to which no response is required. By way of further response, PECO denies that it failed to carry out a written program to prevent damage to a buried pipeline from excavation activities under 49 C.F.R. § 192.614(a) and 52 Pa. Code § 59.33(b). PECO also denies that it failed to follow its Gas Damage Prevention procedure, section 5.6.4.2, found in GO-PE-9003, Revision No. 2. PECO further denies I&E's contention that section 5.6.4.2 requires confirmation that *all* excavators have valid PA One Call requests. In determining the need for an inspection/audit, Section 5.6.4.2 of PECO's Gas Damage Prevention procedure requires the Damage Prevention Inspector to confirm that an excavator's existing One Call ticket is valid and correct. This section does not require PECO to ensure that every excavator or potential excavator makes a PA One Call request before excavating. The PA One Call Law places that responsibility solely on the excavator.

COUNT FOUR

50. All responses in paragraphs 1-49 are incorporated as if fully set forth herein.

51. Denied. The allegations in Paragraph 51 are conclusions of law to which no response is required. By way of further response, PECO denies that it failed to carry out a written program to prevent damage to a buried pipeline from excavation activities under 49 C.F.R. § 192.614(a) and 52 Pa. Code § 59.33(b). PECO further denies that it failed to follow its Gas Damage Prevention procedure, section 5.6.4.3, found in GO-PE-9003, Revision No. 2. Section 5.6.4.3 of the Gas Damage Prevention procedure provides that when inspections are warranted the Damage Prevention Inspector will review the One Call ticket to ensure that the excavator and locator have the same understanding of the job site. I&E incorrectly presumes without any factual support that PECO did not follow this section because it was unaware that a concrete stair structure was constructed over the gas main. PECO avers that the concrete stairs provided no safety or access concerns to PECO's facilities.

COUNT FIVE

52. All responses in paragraphs 1-51 are incorporated as if fully set forth herein.

53. Denied. The allegations in Paragraph 53 are conclusions of law to which no response is required. By way of further response, PECO denies that it failed to carry out a written program to prevent damage to a buried pipeline from excavation activities under 49 C.F.R. § 192.614(a) and 52 Pa. Code § 59.33(b). PECO further denies that it failed to follow section 5.6.4.4 of its Gas Damage Prevention procedure, found in GO-PE-9003, Revision No. 2. I&E has misread and misconstrued PECO's Gas Damage Prevention procedure. In performing inspections/audits (in response to a PA One Call request) section 5.6.4.2 of PECO's Gas Damage Prevention procedure requires the Damage Prevention Inspector to determine the schedule of

when the Company's facilities will be crossed in the context of an existing One Call excavation ticket. Because no PA One Call request was submitted for the light pole installation work, such a determination could not have been made. Had Eastern Caisson submitted a locate request, PECO would have communicated with Eastern Caisson about the excavation work and would have investigated the location/markings of its main. Furthermore, had Eastern Caisson excavated according to PECO's permanent marker posts, the main would not have been compromised in its existing location.

COUNT SIX

54. All responses in paragraphs 1-53 are incorporated as if fully set forth herein.

55. Denied. The allegations in Paragraph 55 are conclusions of law to which no response is required. By way of further response, PECO denies that it failed to carry out a written program to prevent damage to a buried pipeline from excavation activities under 49 C.F.R. § 192.614(a) and 52 Pa. Code § 59.33(b). PECO further denies that it failed to follow section 5.6.4.7 of its Gas Damage Prevention procedure, found in GO-PE-9003, Revision No. 2. Nowhere in its Complaint does I&E provide facts that underlie this claim.

I&E has misread and misconstrued PECO's Gas Damage Prevention procedure. As plainly stated in that procedure, PECO's requirements are triggered by the submission and receipt of a PA One Call locate request. Because no PA One Call request was submitted for the light pole installation work, the requirements under PECO's Gas Damage Prevention procedure, including section 5.6.4.7, were not triggered for that work. As a result, PECO could not conduct or document any site meetings relative to Eastern Caisson's light pole excavation work via an electronic inspection report. PECO did in fact document via an electronic inspection report all

site meetings before or during all excavation activities covered by the PA One Call requests received in connection with the Rosemont College construction site.

COUNT SEVEN

56. All responses in paragraphs 1-55 are incorporated as if fully set forth herein.

57. Denied. The allegations in Paragraph 57 are conclusions of law to which no response is required. By way of further response, PECO denies that it failed to carry out a written program to prevent damage to a buried pipeline from excavation activities under 49 C.F.R. § 192.614(a) and 52 Pa. Code § 59.33(b). PECO further denies that it failed to follow section 5.6.4.8 of its Gas Damage Prevention procedure, found in GO-PE-9003, Revision No. 2.

First, I&E has misread and misconstrued PECO's Gas Damage Prevention procedure. As plainly stated in that procedure, PECO's requirements are triggered by the submission and receipt of a PA One Call locate request. Because no PA One Call request was submitted for the light pole installation work, the requirements under PECO's Gas Damage Prevention procedure, including section 5.6.4.8, were not triggered for that work. As a result, PECO could not review locator marks for accuracy in connection with Eastern Caisson's light pole installation work.

Second, PECO did in fact review locator marks for accuracy during inspections at the construction site. *See* Exhibit E. In fact, PECO reviewed for accuracy the permanent marker posts installed over the main that was struck by Eastern Caisson. *See* Exhibit E.

Third, in the weeks following the incident, PECO, accompanied by PUC inspectors, confirmed the presence of visible marker posts on the site that accurately identified the location of the main.

COUNT EIGHT

58. All responses in paragraphs 1-57 are incorporated as if fully set forth herein.

59. Denied. The allegations in Paragraph 59 are conclusions of law to which no response is required. By way of further response, PECO denies that it failed to carry out a written program to prevent damage to a buried pipeline from excavation activities under 49 C.F.R. § 192.614(a) and 52 Pa. Code § 59.33(b). PECO also denies I&E's contention that PECO failed to follow section 5.9.1.3 of its Gas Damage Prevention procedure, found in GO-PE-9003, Revision No. 2. Furthermore, it is denied that section 5.9.1.3 directs *PECO* to document the results of a locate request by completing all required documentation on the electronic close screen within the ticket management system, with a positive response to the PA One Call KARL system. Rather, section 5.9.1.3 directs the *locating contractor* to document those results. To the extent that I&E is referring to PA One Call request numbers 20111682524, 20130071986 and 20132200925, referenced in Paragraphs 25 and 26 of the Complaint, PECO denies that those requests at all relate to the August 7, 2013 incident.

Furthermore, the phrase "positive response" in PECO's Damage Prevention procedure refers to the twelve facility owner responses used by the KARL system. These include interim responses that provide applicable guidance to excavators and designers, including the need for further information or action. For each design and locate request identified in Paragraphs 25 and 26 of the Complaint, PECO provided a positive response, as contemplated by the KARL system. Furthermore, PECO avers that no response was provided in connection with the August 7, 2013 incident because no PA One Call locate request was ever submitted. For a further explanation of the requests referred to in Paragraphs 25 and 26 of the Complaint, please see Paragraphs 25 and 26 of the Answer, above.

COUNT NINE

60. All responses in paragraphs 1-59 are incorporated as if fully set forth herein.

61. Denied. The allegations in Paragraph 61 are conclusions of law to which no response is required. By way of further response, PECO denies that it failed to carry out a written program to prevent damage to a buried pipeline from excavation activities under 49 C.F.R. § 192.614(a) and 52 Pa. Code § 59.33(b). PECO further denies that it failed to follow its Gas Damage Prevention procedure, section 5.10.4, found in GO-PE-9003, Revision No. 2, under which it is tasked with maintaining a copy of the responses to the designer and an electronic record of the disposition of the PA One Call requests. *See* Exhibit D for a copy of PECO's electronic responses One Call requests related to the Rosemont College construction project. PECO denies that section 5.10.4 at all relates to the August 7, 2013 incident because no PA One Call request was submitted for the work performed by Eastern Caisson.

COUNT TEN

62. All responses in paragraphs 1-61 are incorporated as if fully set forth herein.

63. Denied. The allegations in Paragraph 63 are conclusions of law to which no response is required. By way of further response, PECO denies that it failed to carry out a written program to prevent damage to a buried pipeline from excavation activities under 49 C.F.R. § 192.614(a) and 52 Pa. Code § 59.33(b). PECO further denies that it failed to follow section 5.10.5 of its Gas Damage Prevention procedure, found in GO-PE-9003, Revision No. 2, under which PECO is required to document the results of completion of the design request by completing all required documentation on the electronic close screen within the ticket management system with positive response to the PA One Call KARL system. PECO denies that section 5.10.5 at all relates to the August 7, 2013 incident because no PA One Call request was submitted for the work performed by Eastern Caisson.

Furthermore, as explained in Paragraph 59, above, the phrase “positive response” in PECO’s Damage Prevention procedure refers to the twelve facility owner responses used by the KARL system. These include interim and final responses that provide applicable guidance to excavators, including the need for further information or action. For each PA One Call request identified in Paragraphs 25 and 26 of the Complaint, PECO provided a positive response, as contemplated by the KARL system. Furthermore, PECO avers that no response was provided in connection with the August 7, 2013 incident because no PA One Call locate request was ever submitted.

COUNT ELEVEN

64. All responses in paragraphs 1-63 are incorporated as if fully set forth herein.

65. Denied. The allegations in Paragraph 65 are conclusions of law to which no response is required. By way of further response, PECO denies that it failed to carry out a written program to prevent damage to a buried pipeline from excavation activities under 49 C.F.R. § 192.614(a) and 52 Pa. Code § 59.33(b). PECO further denies that it failed to follow section 5.9.1.4 of its Gas Damage Prevention procedure, found in GO-PE-9003, Revision No. 2. PECO denies I&E’s allegation that PECO failed to identify high profile jobs at the site. PECO denies that it was obligated to identify Eastern Caisson’s light pole installation work as high profile. PECO’s locating contractor identifies PA One Call tickets as high profile on a ticket-by-ticket basis. PECO could not have identified a ticket for Eastern Caisson’s light pole installation work as high profile because no such ticket was submitted.

COUNT TWELVE

66. All responses in paragraphs 1-65 are incorporated as if fully set forth herein.

67. Denied. The allegations in Paragraph 67 are conclusions of law to which no response is required. By way of further response, PECO denies that it failed to carry out a written program to prevent damage to a buried pipeline from excavation activities under 49 C.F.R. § 192.614(a) and 52 Pa. Code § 59.33(b). PECO also denies that it failed to follow its Gas Damage Prevention procedure, found in GO-PE-9003, Revision No. 2.

Furthermore, it is denied that PECO and its locating contractor did not provide the additional supervision required by a high profile job. Section 5.9.1.4 of PECO's Gas Damage Prevention procedure requires PECO's PA One Call locators to review PA One Call requests to determine on a ticket-by-ticket basis whether any individual request qualifies as high profile. No PA One Call request was submitted for the light pole installation work that resulted in the incident, so no ticket for that work could be identified by USIC as high profile.

In addition, PECO denies that it is required to provide weekly reports to the dig-safe instructor for high profile PA One Call tickets. PECO's "High Profile Process," provided in PECO's Gas Damage Prevention procedure, requires PECO's Damage Prevention Inspector to: "Return[] all completed audits and summary to PECO Dig Safe Supervisor weekly." That statement only speaks to the deadline for returning completed audits and summaries to PECO's Dig Safe Supervisor. That statement does not require PECO's Damage Prevention Inspector to complete audits and summaries each week. To the contrary, the purpose of section 5.6.3 of the Gas Damage Prevention procedure is to provide factors that PECO's Damage Prevention Inspector must consider in determining the need for and extent of audits/inspections.

COUNT THIRTEEN

68. All responses in paragraphs 1-67 are incorporated as if fully set forth herein.

69. Denied. The allegations in Paragraph 69 are conclusions of law to which no response is required. By way of further response, PECO denies that it failed to carry out a written program to prevent damage to a buried pipeline from excavation activities under 49 C.F.R. § 192.614(a) and 52 Pa. Code § 59.33(b). PECO expressly denies that naming STS instead of USIC in Revision No. 2 had anything to do with the August 7, 2013 incident. PECO's locating contractor, USIC, adequately responded to all PA One Call requests at the site in accordance with all applicable laws, regulations and PECO's Gas Damage Prevention procedure. *See Exhibits B, C.* Furthermore, PECO states the Gas Damage Prevention procedure were subsequently revised to reference USIC instead of STS.

COUNT FOURTEEN

70. All responses in paragraphs 1-69 are incorporated as if fully set forth herein.

71. Denied. The allegations in Paragraph 71 are conclusions of law to which no response is required. By way of further response, PECO denies that it failed to carry out a written program to prevent damage to a buried pipeline from excavation activities under 49 C.F.R. § 192.614(a) and 52 Pa. Code § 59.33(b).

PECO expressly denies I&E's contention that, at the time of the incident, PECO was not using any procedure to install marker balls. PECO used the standards and specific operations parameters found in the following 3M documents: 3M EMS iD Ball Marker Installation Instructions; 3M Dynatel EMS-iD Locator 1420 Operators Manual; and 3M Dynatel 1420 EMS-iD Marker Locator - Marker Locating Quick Reference Guide. *See Exhibit I.* At the time of the incident, PECO was still studying and testing the use of marker balls. PECO has since developed an internal standard that has essentially incorporated the standards and instructions contained in the 3M documents at Exhibit I. *See Exhibit J.* PECO denies that the lack of an

internal standard for marker balls at the time of the incident caused or relates to the incident, particularly where PECO still relied on essentially the same standard as in the 3M documents at Exhibit I.

Further, PECO expressly denies that the location of the marker balls contributed to the incident. In this instance, PECO did place permanent marker posts on the site to notify excavators that a gas main was present, and the marker posts were still visible even after the re-grading of the site. Nevertheless, Eastern Caisson proceeded to drill to install light poles without submitting a PA One Call request and without paying attention to the permanent marker posts. *See Exhibits F, G.*

COUNT FIFTEEN

72. All responses in paragraphs 1-71 are incorporated as if fully set forth herein.

73. Denied. The allegations in Paragraph 73 are conclusions of law to which no response is required. By way of further response, PECO denies that it failed to carry out a written program to prevent damage to a buried pipeline from excavation activities under 49 C.F.R. § 192.614(a) and 52 Pa. Code § 59.33(b). PECO's Damage Prevention procedure included requirements for communication with third-party contractors during the scope of excavations.

First, after submission of a locate request by an excavator, section 4.2.1 of PECO's Gas Damage Prevention procedure required PECO and/or its locating contractor to conduct, where appropriate, a *pre-excavation meeting with the excavator to discuss all aspects of the planned excavation activities*. PECO had no duty to conduct a pre-excavation meeting with Eastern Caisson prior to the August 7, 2013 incident because no PA One Call locate request was submitted that would have alerted PECO to Eastern Caisson's planned excavation activities.

Second, after submission of a locate request by an excavator, if PECO's Damage Prevention Inspector determines the need for an inspection under section 5.6.3, the inspector must: 1) confirm that the excavator has a valid locate request, 2) review the locate request scope of work and insure that the excavator and locator have the same understanding of the extent of the job site, and 3) insure that the excavator has knowledge of proper clearances and backfill techniques for the respective facility type. No PA One Call locate request was submitted for the light pole installation work prior to the August 7, 2013 incident, so PECO had no duty and no opportunity to communicate with the third-party contractors at the Rosemont College construction site during the scope of the light pole installation activities that resulted in the August 7, 2013 incident.

COUNT SIXTEEN

74. All responses in paragraphs 1-73 are incorporated as if fully set forth herein.

75. Denied. The allegations in Paragraph 75 are conclusions of law to which no response is required. By way of further response, PECO states that it did relocate the main after it was compromised by Eastern Caisson's failure to comply with the PA One Call Law and such re-location—which occurred after the incident—obviously did not in any way contribute to the incident itself. Furthermore, PECO's Gas Damage Prevention procedure adequately addresses the prevention of damage to buried pipelines both before and after any relocation.

COUNT SEVENTEEN

76. All responses in paragraphs 1-75 are incorporated as if fully set forth herein.

77. Denied. The allegations in Paragraph 77 are conclusions of law to which no response is required. By way of further response, PECO denies that it failed to have a required procedure for continuing surveillance of its facilities under 49 C.F.R. § 192.613(a) and 52 Pa.

Code § 59.33(b) to determine and take appropriate action concerning unusual operation and maintenance conditions. The proximate cause of the incident on August 7, 2013 was the failure to submit a locate request as required by the PA One Call Law. PECO had no duty to be present on the site for activities that were not covered by a PA One Call request.

COUNT EIGHTEEN

78. All responses in paragraphs 1-77 are incorporated as if fully set forth herein.

79. Denied. The allegations in Paragraph 79 are conclusions of law to which no response is required. By way of further response, PECO denies that it had any reason to believe that its main would be damaged by excavation activities at the site performed by Eastern Caisson. To the contrary, PECO was never notified of the scope of work undertaken by Eastern Caisson, and Eastern Caisson neither submitted a PA One Call request nor exercised reasonable care in conducting its excavation. PECO did conduct such inspections as frequently as necessary when it received locate requests from the other contractors or subcontractors at the construction site. *See Exhibits C, D, E.* PECO based the frequency of its inspections on the criteria in section 5.6.3 laid out in Paragraph 47, above.

COUNT NINETEEN

80. All responses in paragraphs 1-79 are incorporated as if fully set forth herein.

81. Denied. The allegations in Paragraph 81 are conclusions of law to which no response is required. By way of further response, PECO denies that it did not use every reasonable effort to protect the public from danger and did not exercise reasonable care to reduce hazards under 52 Pa. Code § 59.33(a) because PECO did not to remove the line from service. No PA One Call request was submitted for the light pole installation work that resulted in the incident. As a result, PECO had no reason to believe that such work would occur and therefore

had no reason to consider removing the line from service. PECO denies that it is reasonable to expect PECO to know about excavation activity that is not associated with a PA One Call request. PECO denies that it is reasonable to expect PECO to shut off service to its customers in anticipation of the recklessness of excavators who fail to comply with the PA One Call Law, fail to submit a PA One Call locate request, and fail to use prudent techniques to identify the precise location of underground facilities before excavating.

COUNT TWENTY

82. All responses in paragraphs 1-81 are incorporated as if fully set forth herein.

83. Denied. The allegations in Paragraph 83 are conclusions of law to which no response is required. By way of further response, PECO denies that it did not use every reasonable effort to protect the public from danger and did not exercise reasonable care to reduce hazards under 52 Pa. Code § 59.33(a) because PECO allegedly did not communicate intended site activity with the excavation contractors. No PA One Call request was submitted for the light pole installation work that resulted in the incident, so PECO had no knowledge of Eastern Caisson's intentions to conduct any work, and PECO had no duty to communicate such unknown intentions with other excavation contractors. To the extent that I&E is referring to "intended site activity" other than the light pole installation work, PECO denies that communicating such other site activity with the excavation contractors would have had any impact on the August 7, 2013 incident.

COUNT TWENTY-ONE

84. All responses in paragraphs 1-83 are incorporated as if fully set forth herein.

85. Denied. The allegations in Paragraph 85 are conclusions of law to which no response is required. By way of further response, PECO denies that it did not use every

reasonable effort to protect the public from danger and did not exercise reasonable care to reduce hazards under 52 Pa. Code § 59.33(a) because PECO allegedly did not adequately monitor the activities around the gas main running through the construction site. PECO responded to 19 PA One Call requests, installed marker posts, and inspected the construction site 7 times in July 2013. *See Exhibits C, D, E.* No PA One Call request was submitted for the light pole installation work that resulted in the incident, so PECO had no reason to believe that those activities should be monitored. Prior to Eastern Caisson commencing the light pole installation work at the site, Eastern Caisson did not submit a PA One Call request and did use prudent techniques required by the PA One Call Law, and notwithstanding the fact that marker posts that accurately identified the location of the main were visible on the site at the time of the incident, *see Exhibits F, G,* Eastern Caisson proceeded to drill to a depth of 14 feet and strike PECO's gas main.

V. Relief Requested

WHEREFORE, PECO Energy Company respectfully requests that the Commission deny the relief requested by the Bureau of Investigation and Enforcement of the Pennsylvania Public Utility Commission and dismiss the Formal Complaint with prejudice.

NEW MATTER OF RESPONDENT, PECO ENERGY COMPANY

PECO, pursuant to 52 Pa. Code 5.62(b), further responds to the Complaint and states as follows:

VI. Additional Relevant Facts

1. PECO hereby incorporates by reference its responses to Paragraphs 1 through 85 of the Complaint, as well as its introductory comments preceding those responses, as if fully set forth herein.

2. Rosemont College hired Dale Construction to serve as the general contractor for the construction of an athletic facility.

3. Foss Electric was the electrical contractor for Dale Construction.

4. Eastern Caisson was the subcontractor for Foss Electric

5. Eastern Caisson was hired to install light poles for an athletic field.

6. A number of other contractors and subcontractors conducted excavation activities at the site.

7. A true and correct copy of PECO's Gas Damage Prevention procedure, GO-PE-9003, Revision No. 2, is attached hereto as Exhibit A.

8. The specific duties set forth in PECO's Gas Damage Prevention procedure are triggered by the submission of a PA One Call locate request.

9. As stated in section 1.2 of PECO's Gas Damage Prevention procedure, GO-PE-9003, Revision No. 2, "[a] portion of Gas Operations Damage Prevention Program is fulfilled by participation in the Pennsylvania One-Call System."

10. The PA One Call Law requires owners of facilities, such as gas pipelines, to be a member of and give written notice to PA One Call. 73 P.S. § 177(1).

11. PECO's pipeline system is covered by PA One Call.

12. The PA One Call Law places a duty on the excavator to "request the location and type of facility owner lines at each site by notifying the facility owner through the One Call System." 73 P.S. § 180(2.1).

13. Eastern Caisson had a legal duty under the PA One Call Law to request the location and type of facility owner lines by notifying the facility owner, PECO, through the One Call System. 73 P.S. § 180(2.1).

14. Eastern Caisson engaged in excavation for the installation of light poles on August 7, 2013 without first submitting a locate request as required by the PA One Call Law.

15. Eastern Caisson failed to perform its legal duty to submit a PA One Call request.

16. Regulations under the OSH Act at 29 C.F.R. § 1926.651 require employers, before initiating excavation work, to comply with the following:

Utility companies or owners shall be contacted within established or customary local response times, advised of the proposed work, and asked to establish the location of the utility underground installations prior to the start of actual excavation. When utility companies or owners cannot respond to a request to locate underground utility installations within 24 hours (unless a longer period is required by state or local law), or cannot establish the exact location of these installations, the employer may proceed, provided the employer does so with caution, and provided detection equipment or other acceptable means to locate utility installations are used.

29 C.F.R. § 1926.651(b)(2).

17. Eastern Caisson had a duty under 29 C.F.R. § 1926.651(b)(1) to contact PECO within established or customary local response times, advise PECO of the proposed work and ask PECO to establish the location of the utility underground installations prior to the start of actual excavation.

18. Eastern Caisson failed to meet its duty under 29 C.F.R. § 1926.651(b)(1) to contact PECO within established or customary local response times, advise PECO of the proposed work and ask PECO to establish the location of the utility underground installations prior to the start of actual excavation.

19. In the absence of a PA One Call request, Eastern Caisson had a duty under 29 C.F.R. § 1926.651(b)(1) to proceed with caution and use detection equipment or other acceptable means to locate utility installations.

20. Eastern Caisson failed to meet its duty under 29 C.F.R. § 1926.651(b)(1) to proceed with caution and use detection equipment or other acceptable means to locate utility installations.

21. A true and correct summary of the PA One Call tickets received for the Rosemont College construction project is attached hereto as Exhibit C.

22. True and correct copies of the PA One Call tickets received for the Rosemont College construction project are attached hereto as Exhibit D.

23. On August 16, 2013, Foss Electric submitted PA One Call request No. 20132200925 for "drilling hole posts."

24. PA One Call No. 20132200925 was submitted after the August 7, 2013 incident and therefore did not in any way cause or contribute to the August 7, 2013 incident.

25. PA One Call No. 20132200925 was submitted to request a mark-out of the new main that was installed to replace the main that was damaged by Eastern Caisson, and therefore did not cause or relate to the August 7, 2013 incident.

26. USIC entered an incorrect response in the KARL system of "Not Marked – Due to No Access" for PA One Call No. 20132200925.

27. USIC marked the new main in response to PA One Call No. 20132200925.

28. No locate request was received on or prior to August 7, 2013 for the light pole installation activities that resulted in the incident on August 7, 2013.

29. None of the locate requests received on or prior to August 7, 2013 for the athletic facility project related to the scope of work of installing light poles.

30. None of the locate requests received on or prior to August 7, 2013 for the athletic facility project related to the depth of excavation involved in installing the light poles.

31. None of the locate requests received on or prior to August 7, 2013 for the athletic facility project were submitted by Eastern Caisson.

32. Foss Electric, the electrical contractor that hired Eastern Caisson, submitted the following PA One Call requests prior to the incident: PA One Call No. 20131421231, dated May 22, 2013 and PA One Call No. 20131840770, dated July 3, 2013.

33. Neither PA One Call No. 20131421231 nor PA One Call No. 20131840770 related to the scope of work of installing light poles.

34. Neither PA One Call No. 20131421231 nor PA One Call No. 20131840770 related to the depth of excavation involved in installing the light poles.

35. Neither PA One Call No. 20131421231 nor PA One Call No. 20131840770 was submitted by Eastern Caisson.

36. Neither PA One Call No. 20131421231 nor PA One Call No. 20131840770 covered the timeframe for the light pole installation work on August 7, 2013, the date of the incident.

37. PA One Call No. 20131421231 states that Foss Electric was working at Rosemont College at Cardinal Hall installing electric service and a generator.

38. PA One Call No. 20131840770 states that Foss Electric was working at Rosemont College at Kistler Library and Kaul Hall installing electric service and a generator.

39. Both PA One Call No. 20131421231 and PA One Call No. 20131840770 listed an excavation depth of 3 feet.

40. Both PA One Call No. 20131421231 and PA One Call No. 20131840770 were submitted by Foss Electric.

41. PA One Call No. 20131421231 lists lawful start dates of May 29, 2013 through June 6, 2013 and provides a duration of two weeks.

42. PA One Call No. 20131840770 lists lawful start dates of July 9, 2013 through July 18, 2013 and provides a duration of two weeks.

43. The July 12, 2013 and July 16, 2013 locate requests submitted by Cavan Construction Co, Inc. were not related to the August 7, 2013 incident.

44. Neither the July 12, 2013 request nor the July 16, 2013 request submitted by Cavan Construction Co, Inc. related to the scope of work of installing light poles.

45. Neither the July 12, 2013 request nor the July 16, 2013 request submitted by Cavan Construction Co, Inc. related to the depth of excavation involved in installing the light poles.

46. Neither the July 12, 2013 request nor the July 16, 2013 request submitted by Cavan Construction Co, Inc. was submitted by Eastern Caisson.

47. PA One Call Identification Numbers 20111682524 and 20130071986 were not related to the August 7, 2013 incident.

48. Neither PA One Call No. 20111682524 nor PA One Call No. 20130071986 related to the scope of work of installing light poles.

49. Neither PA One Call No. 20111682524 nor PA One Call No. 20130071986 related to the depth of excavation involved in installing the light poles.

50. Neither PA One Call No. 20111682524 nor PA One Call No. 20130071986 was submitted by Eastern Caisson.

51. The PA One Call Law requires facility owners, after receipt of a timely request from an excavator or operator who identifies the site of excavation or demolition work he intends

to perform, to respond to all PA One Call notices and to mark, stake, locate or otherwise provide the position of the facility owner's underground lines at the site within eighteen inches horizontally from the outside wall of such line in a manner so as to enable the excavator, where appropriate, to employ prudent techniques, which may include hand-dug test holes, to determine the precise position of the underground facility owner's lines. *See* 73 P.S. § 177(5).

52. PECO fulfilled its legal duty under the PA One Call Law to accurately mark its facilities in response to all PA One Call requests submitted as part of the Rosemont College athletic facility construction project.

53. PECO's locating contractor, USIC, responded to PA One Call No. 20131421231 on May 28, 2013 and marked the area of the main with yellow paint and flags.

54. PECO's locating contractor, USIC, responded to PA One Call No. 20131840770 on July 8, 2013 and marked the area of the main with yellow paint and flags.

55. True and correct copies of the inspection reports prepared by PECO's Damage Prevention Inspector at the Rosemont College construction site is attached hereto as Exhibit E.

56. On July 9, 2013, PECO's Damage Prevention Inspector installed five marker balls and four permanent gas marker posts to mark the main that was eventually struck by Eastern Caisson. *See* Exhibit E.

57. On July 30, 2013, PECO's Damage Prevention Inspector installed two marker balls two feet below grade. *See* Exhibit E.

58. PECO's marker balls are used by PECO's locator, USIC, to accurately locate and mark underground facilities.

59. True and correct copies of the following 3M documents are attached hereto as Exhibit I: 3M EMS iD Ball Marker Installation Instructions; 3M Dynatel EMS-iD Locator 1420

Operators Manual; and 3M Dynatel 1420 EMS-iD Marker Locator - Marker Locating Quick Reference Guide.

60. At the time of the incident, PECO maintained and relied upon the marker ball standards and specific operations parameters found in the following 3M documents attached as Exhibit I: 3M EMS iD Ball Marker Installation Instructions; 3M Dynatel EMS-iD Locator 1420 Operators Manual; and 3M Dynatel 1420 EMS-iD Marker Locator - Marker Locating Quick Reference Guide.

61. At the time of the incident, PECO was still studying and testing the use of marker balls.

62. A true and correct copy of PECO's marker ball standard is attached hereto as Exhibit J.

63. Since the time of the incident, PECO developed an internal standard for marker balls that has essentially incorporated the standards and instructions contained in the 3M documents at Exhibit I. *See* Exhibit J.

64. The lack of an internal PECO standard for marker balls at the time of the incident did not cause or relate to the incident, particularly where PECO still relied on essentially the same standard as in the 3M documents at Exhibit I. *See* Exhibit J.

65. True and correct copies of photographs taken on August 8, 2013 depicting the permanent marker posts are attached hereto as Exhibit F.

66. The photographs in Exhibit F illustrate that the marker posts were nearby and in plain view from where Eastern Caisson was drilling when the incident occurred.

67. True and correct copies of two maps depicting the area of the Rosemont College construction project before and after the August 7, 2013 incident are attached hereto as Exhibit G.

68. At the time of the incident on August 7, 2013, the permanent marker posts were still visible.

69. On the day after the incident, August 8, 2013, PECO, accompanied by PUC inspectors, determined that the permanent marker posts were visible and that the two marker balls were located under the marker posts.

70. On August 16, 2013, PECO, accompanied by PUC inspectors, confirmed through excavations that the two marker balls installed on July 30, 2013 and the marker posts accurately identified the location of the main.

71. PECO does not have a maximum depth requirement for its gas mains.

72. The main damaged by Eastern Caisson, located 14 feet below grade, was located at a depth within PECO's construction standards.

73. Concrete stairs were present at the time of August 7, 2013 incident.

74. During PECO's Damage Prevention Inspector's July 30, 2013 site visit, the inspector observed no evidence of installation of the concrete structure.

75. PECO never received a locate request or any other notification regarding the installation of the concrete stairs.

76. The location of the concrete stairs did not contribute to the August 7, 2013 incident because the excavation occurred elsewhere.

77. The location of the concrete stairs provided no safety or access concerns that would require PECO to relocate its facilities.

78. PECO had no duty under the PA One Call Law or federal regulations to inspect the concrete stairs prior to the August 7, 2013 incident because no PA One Call locate request was submitted for the concrete stairs.

79. The PA One Call Law places a duty on the excavator to “exercise due care.” 73 P.S. § 180(4).

80. The PA One Call Law provides:

When the information required from the facility owner under clause (5)(i) of section 2 cannot be provided or due to the nature of the information received from the facility owner, it is reasonably necessary for the excavator to ascertain the precise location of any line or abandoned or unclaimed lines by prudent techniques, which may include hand-dug test holes, vacuum excavation or other similar devices, the excavator shall promptly notify the project owner or the project owner’s representative, either orally or in writing.

73 P.S. § 180(15).

81. Even where insufficient information is provided by a facility operator in response to a locate request, Section 5(15) of the PA One Call Law requires the excavator to reasonably ascertain the precise location of any line by prudent techniques, which may include hand-dug test holes, vacuum excavation, or other similar devices. 73 P.S. § 180(15).

82. A true and correct copy of the Pennsylvania Supreme Court’s decision in *Excavation Technologies, Inc. v. Columbia Gas Co. of Pa.*, 985 A.2d 840 (Pa. 2009), is attached hereto as Exhibit H.

83. The Pennsylvania Supreme Court explained in *Excavation Technologies, Inc. v. Columbia Gas Co. of Pa.*, 985 A.2d 840 (Pa. 2009), that, under the PA One Call Law, “excavators, not utility companies, retain the duty to identify the precise location of facilities”

because excavators “are in the best position to employ prudent techniques on job sites to prevent facility breaches.” *Id.* at 844.

84. The General Assembly, by enacting the PA One Call Law, declared that excavators, not utility companies, retain the duty to identify the precise location of facilities.

85. Eastern Caisson excavated to install the light pole without exercising due care.

86. Eastern Caisson failed to perform its legal duty under 73 P.S. § 180(4) to exercise due care in excavating to install the light pole.

87. Eastern Caisson excavated to install the light pole without ascertaining the location of PECO’s main by prudent techniques, as required by the PA One Call Law.

88. Eastern Caisson failed to perform its legal duty under 73 P.S. § 180(15) to ascertain the location of PECO’s main by prudent techniques prior to excavating to install the light pole.

89. Holding PECO to a standard that exceeds existing federal or state requirements and unfairly shifting duties and liabilities set forth in the PA One Call Law from excavator to facility owner, would increase liabilities and costs borne by NGDCs (and ultimately their customers); diminish the accountability of excavators, who are in the best position to prevent facility breaches; and encourage negligent, careless and reckless behavior.

90. The term “complex project” is defined under the PA One Call Law as “an excavation that involves more work than properly can be described in a single locate request or any project designated as such by the excavator as a consequence of its complexity or its potential to cause significant disruption to lines or facilities and the public, including excavations that require scheduling locates over an extended time frame.” 73 P. S. § 176.

91. The PA One Call Law places a duty on the excavator, “[i]n a complex project or if an excavator intends to perform work at multiple sites or over a large area, [to] take reasonable steps to work with facility owners, including scheduling and conducting a preconstruction meeting, so that they may locate their facilities at a time reasonably in advance of the actual start of excavation or demolition work for each phase of the work. 73 P.S. § 180(3).

92. If the excavator does not believe that a preconstruction meeting is necessary, the PA One Call Law requires the excavator to indicate such belief in its notice. 73 P.S. § 180(3).

93. Where an excavator has initiated a preconstruction meeting for a complex project under Section 5(3), the PA One Call Law requires facility owners to participate in that preconstruction meeting. 73 P.S. § 177(5).

94. PECO had no duty under the PA One Call Law to initiate a preconstruction meeting at the construction site.

95. PECO had no duty under the PA One Call Law to initiate a preconstruction meeting for the light pole installation work that resulted in the August 7, 2013 incident.

96. PECO had no duty to have a meeting with Eastern Caisson prior to its light pole installation activities.

97. Eastern Caisson had a duty under the PA One Call Law to take reasonable steps to work with facility owners, including scheduling and conducting a preconstruction meeting, so that they may locate their facilities at a time reasonably in advance of the actual start of the light pole installation activities.

98. Eastern Caisson failed to perform its duty under the PA One Call Law to take reasonable steps to work with facility owners, including scheduling and conducting a

preconstruction meeting, so that they may locate their facilities at a time reasonably in advance of the actual start of the light pole installation activities.

99. The PA One Call Law provides that, “[a]fter commencement of excavation or demolition work, the excavator shall be responsible for protecting and preserving the staking, marking or other designation until no longer required for proper and safe excavation or demolition work at or near the underground facility, or by contacting the One Call System to request that the facilities be marked again in the event that the previous markings have been compromised or eliminated.” 73 P.S. § 180(3).

100. PECO had no duty under the PA One Call Law or federal regulations to review locator marks for accuracy in connection with Eastern Caisson’s light pole installation work.

101. No requests were received from Foss Electric or Eastern Caisson to mark or re-mark facilities after PA One Call 20131840770’s lawful start dates of July 9, 2013 to July 18, 2013 and before the August 7, 2013 incident.

102. Under the PA One Call Law, “an excavator shall incur any obligation or be subject to liability as a result of an excavator’s demolition or excavation work damaging a facility owner’s facilities . . . “[w]here an excavator has failed to comply with the terms of this act or was otherwise negligent” 73 P.S. § 180(6)(ii).

103. A prudent excavator would have easily recognized the potential for damage inherent in drilling to install the light poles at the location of the incident based on the existence of visible marker posts, *see* Exhibits F, G, and if prudent techniques were used to locate the main, as required by the PA One Call Law.

104. A prudent excavator submits a PA One Call locate request prior to excavating.

105. A prudent excavator would have known the potential for damage inherent in drilling to install the light poles at the location of the incident because the prudent excavator would have submitted a PA One Call locate request.

106. A designer, which the PA One Call Law defines as “any architect, engineer or other person who or which prepares a drawing for a construction or other project which requires excavation or demolition work,” has a duty to submit a request to PA One Call for line and facility information. 73 P.S. §§ 176, 179(2).

107. The PA One Call Law requires facility owners to respond to design requests for information as to the position and type of the facility owner's lines at such site based on the information currently in the facility owner's possession or to mark the plans which have been provided to it by the designer. 73 P.S. § 177(4).

108. The PA One Call Law places a duty on the designer to “show upon the drawing the position and type of each facility owner’s line.” 73 P.S. § 179(3).

109. The PA One Call Law places a duty on the designer to “make a reasonable effort to prepare the construction drawings to avoid damage to and minimize interference with a facility owner’s facilities in the construction area by maintaining the clearance as provided for in the applicable easement condition or an eighteen-inch clearance of the facility owner’s facilities if no easement restriction exists.” 73 P.S. § 179(4).

110. After PECO’s initial review of the design map for the Rosemont College construction site, the PA One Call Law did not place a duty on PECO to conduct any further review of the design map.

111. PECO maintained a copy of the responses to the designer and an electronic record of the disposition of the PA One Call requests. *See Exhibit D.*

112. Section 5.10.4 of PECO's Gas Damage Prevention procedure does not relate to the August 7, 2013 incident because whether PECO's locating contractor maintained a copy of the response to the designer and electronic record of the disposition of the PA One Call requests did not in any way cause the August 7, 2013 incident.

113. PECO documented the results of completion of the design request by completing all required documentation on the electronic close screen within the ticket management system with positive response to the PA One Call KARL system.

114. Section 5.10.5 of PECO's Gas Damage Prevention procedure does not relate to the August 7, 2013 incident because whether PECO's locating contractor documented results of completion of the design request by completing all required documentation on the electronic close screen within the ticket management system with positive response to the PA One Call KARL system did not in any way cause the August 7, 2013 incident.

115. Section 192.614(c) of the federal pipeline safety regulations lists the minimum requirements for damage prevention programs. 49 C.F.R. § 192.614(c).

116. PECO's Gas Damage Prevention procedure contained the minimum requirements for damage prevention programs at 49 C.F.R. § 192.614(c). *See* Exhibit A.

117. Section 192.614(b) of the federal pipeline safety regulations provides: "An operator may comply with any of the requirements of paragraph (c) of this section through participation in a public service program, such as a one-call system, but such participation does not relieve the operator of responsibility for compliance with this section." 49 C.F.R. § 192.614(b).

118. The minimum requirements of a damage prevention program listed at 49 C.F.R. § 192.614(c) are triggered by the submission of PA One Call requests.

119. Subsection (c)(3) requires an operator to provide a means of receiving and recording notification of planned excavation activities. 49 C.F.R. § 192.614(c)(3).

120. PECO's Gas Damage Prevention procedure provided a means of receiving and recording notification of planned excavation activities, in compliance with 49 C.F.R. § 192.614(c)(3). *See Exhibit A.*

121. Subsection (c)(4) requires that “[i]f the operator has buried pipelines in the area of excavation activity, [the operator must] provide for actual notification of persons who give notice of their intent to excavate of the type of temporary marking to be provided and how to identify the markings.” 49 C.F.R. § 192.614(c)(4).

122. Under Subsection (c)(4), only those persons who give notice of their intent to excavate must be provided actual notification of the type of temporary marking to be provided and how to identify the markings.

123. Under Subsection (c)(4), a person who does not give notice of their intent to excavate is not entitled to be provided actual notification of the type of temporary marking to be provided and how to identify the markings.

124. PECO's Gas Damage Prevention procedure included a means of providing for actual notification of persons who give notice of their intent to excavate of the type of temporary marking to be provided and how to identify the markings, in compliance with 49 C.F.R. § 192.614(c)(4). *See Exhibit A.*

125. Subsection (c)(5) requires an operator to “[p]rovide for temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins.” 49 C.F.R. § 192.614(c)(5).

126. Subsection (c)(5) imposes a duty on the operator to mark the location of its lines only after notification that excavation activities are going to take place in the vicinity of its lines, 49 C.F.R. § 192.614(c)(5), but ultimately “excavators, not utility companies, retain the duty to identify the precise location of facilities.” *Excavation Technologies, Inc. v. Columbia Gas Co. of Pa.*, 985 A.2d 840, 844 (Pa. 2009).

127. PECO’s Gas Damage Prevention procedure complied with 49 C.F.R. § 192.614(c)(5), by providing for temporary marking of buried pipelines in the area of excavation activity before the activity begins. *See* Exhibit A.

128. Subsection (c)(6)(i) requires the operator to provide for inspections as frequently as necessary during and after excavation activities to verify the integrity of a pipeline that an operator has reason to believe could be damaged by such excavation activities. 49 C.F.R. § 192.614(c)(6)(i).

129. PECO’s Gas Damage Prevention procedure provided that inspections must occur as frequently as necessary during and after excavation activities to verify the integrity of a pipeline that PECO has reason to believe could be damaged by such excavation activities, in compliance with 49 C.F.R. § 192.614(c)(6)(i). *See* Exhibit A.

130. PECO had no reason to believe that the main could have been damaged by Eastern Caisson’s light pole installation activities because PECO was not alerted to those activities through a PA One Call request.

131. The term “High Profile” is defined PECO’s Gas Damage Prevention procedure, GO-PE- 9003, Revision No. 2 as “PECO Energy’s numeric designation for PA 1 Call tickets received by S.T.S., Inc. that may require further action by a PECO Damage Prevention inspector.” *See* Exhibit A.

132. PA One Call tickets are identified as high profile on a ticket-by-ticket basis. *See* Exhibit A.

133. An entire construction project is not identified as high profile unless the entire construction project is covered by a single PA One Call ticket, which was not the case for the Rosemont College construction project.

134. Section 5.9.1.4 of PECO's Gas Damage Prevention procedure requires PECO's locators to review PA One Call requests to determine whether any individual request qualifies as high profile. *See* Exhibit A.

135. PECO would have had the opportunity to respond to a PA One Call request for Eastern Caisson's light pole installation work had such a request been timely submitted prior to the August 7, 2013 incident.

136. PECO could not have identified a ticket for Eastern Caisson's light pole installation work as high profile prior to the incident because no such ticket was submitted prior to the incident.

137. Section 5.6.3 of PECO's Gas Damage Prevention procedure provides factors that PECO's Damage Prevention Inspector must consider in determining the need for and extent of audits/inspections. *See* Exhibit A.

138. PECO is not *per se* required to provide weekly reports to the dig-safe instructor for high profile PA One Call tickets. *See* Exhibit A.

139. Naming STS instead of USIC in Revision No. 2 neither contributed to nor caused the August 7, 2013 incident.

140. The locating contractor, USIC, adequately responded to all PA One Call requests at the site in accordance with all applicable laws, regulations and PECO's Gas Damage Prevention procedure.

141. The fact that Revision No. 2 of GO-PE-9003, attached as Exhibit A, did not list a Writer, Reviewer, Technical Approver, Safety Approver, UFAM Approver, or Reason Written, did not in any way relate to the August 7, 2013 incident, nor was it a cause of the August 7, 2013 incident.

142. A true and correct copy of PECO's Gas Damage Prevention procedure, GO-PE-9003, Revision No. 3 is attached hereto as Exhibit B.

143. Revision No. 3 of GO-PE-9003 identifies the writer (Maureen Ludwick) and reviewers (Rob Bedics, Dave Haverstick, Joe Beerley) of Revision No. 2, as well as the reason for writing Revision No. 2 ("Periodic review"). *See Exhibit B.*

144. PECO's Gas Damage Prevention procedure was subsequently revised to reference USIC instead of STS. *See Exhibit B.*

145. Section 5.6.4.2 of PECO's Gas Damage Prevention procedure only requires PECO's Damage Prevention Inspector to confirm that an excavator has a valid PA One Call request when the inspector is conducting an inspection in connection with that excavator's PA One Call request. *See Exhibit A.*

146. PECO's Damage Prevention Inspector was never presented with the opportunity to confirm that a PA One Call request for the light pole installation work that led to the incident was valid because no such request was submitted.

147. PECO had no duty under the PA One Call Law or federal regulations to determine the schedule of when PECO facilities would be crossed by Eastern Caisson's light pole installation work because no PA One Call request was submitted for that work.

148. PECO had no duty under the PA One Call Law or federal regulations to document all site meetings before and during Eastern Caisson's light pole excavation work via an electronic inspection report because no PA One Call request was submitted for that work.

149. PECO documented via an electronic inspection report all site meetings before or during excavation activities covered by a PA One Call request at the construction site. *See Exhibit E.*

150. Federal regulations at 49 C.F.R. § 192.614(a) do not require PECO to have procedures to address relocation of facilities when such facilities are compromised by excavation and construction activities, and no other federal or state law or regulation imposes such a requirement.

151. PECO had no duty to consider relocating the gas main based on Eastern Caisson's work.

152. Federal regulations state that: "Each operator shall have a procedure for continuing surveillance of its facilities to determine and take appropriate action concerning changes in class location, failures, leakage history, corrosion, substantial changes in cathodic protection requirements, and other unusual operating and maintenance conditions." 49 C.F.R. § 192.613(a).

153. PECO has and complies with a procedure for continuing surveillance of its facilities to determine and take appropriate action concerning changes in class location, failures,

leakage history, corrosion, substantial changes in cathodic protection requirements, and other unusual operating and maintenance conditions.

154. Excavating without submitting a PA One Call locate request does not per se constitute an “unusual operating condition or an “unusual maintenance condition” under 49 C.F.R. § 192.613(a).

155. PECO used every reasonable effort to protect the public from danger and exercised reasonable care to reduce hazards under 52 Pa. Code § 59.33(a).

156. No PA One Call request was submitted for the light pole installation work that resulted in the incident, so PECO had no reason to believe that that work would occur and therefore had no reason to consider removing the line from service.

157. It would not be reasonable to expect PECO to know about excavation activity that is not associated with a PA One Call request.

158. No PA One Call request was submitted for the light pole installation work that resulted in the incident, so PECO had no duty under the PA One Call Law to communicate with other excavation contractors about Eastern Caisson’s intentions to conduct that work.

159. No PA One Call request was submitted for the light pole installation work that resulted in the incident, so PECO had no reason to believe that those activities should be monitored.

160. I&E’s position that PECO should have acted to prevent the August 7, 2013 incident in the absence of a PA One Call locate request would put the Commission’s obligations on pipeline operators ahead of the Pennsylvania General Assembly’s obligations on excavators and would inappropriately shift excavator risks and responsibilities under the PA One Call Law from excavators to NGDCs.

161. I&E's contentions in the Complaint assume that excavators will not submit PA One Call requests, as required by law.

162. PECO has no duty to anticipate that excavators will excavate without submitting any PA One Call locate request.

163. After the August 7, 2013 incident, PECO promptly and voluntarily took steps to restore Rosemont College's service.

164. After the incident, PECO installed a new section of the main in a different location for the convenience of PECO and its customers.

165. The new main did not need to be relocated as a result of the Rosemont College project generally, the August 7, 2013 incident, the depth of the main, the concrete stairs or any other reason.

166. Prior to the August 7, 2013 incident, PECO had no duty to replace the main that was damaged by Eastern Caisson.

167. The new main was placed in operation on August 22, 2013.

168. PECO incurred a cost of approximately \$68,000 to install the new main.

169. PECO fully cooperated with the Commission's investigation into the August 7, 2013 incident.

170. For the reasons stated above, PECO maintains that the amount of the civil penalty assessment is inappropriate. Accordingly, if any violation by PECO, technical or otherwise, did occur, it was unrelated to the August 7, 2013 incident and did not impact safety, and any civil penalty for such a violation should be in a *de minimis* amount.

VII. Affirmative Defenses

FIRST AFFIRMATIVE DEFENSE

171. All allegations in paragraphs 1-171 of the New Matter are incorporated as if fully set forth herein.

172. The Complaint fails to state a claim upon which relief can be granted because PECO at all times maintained a damage prevention program as required by 49 C.F.R. § 192.614.

SECOND AFFIRMATIVE DEFENSE

173. All allegations in paragraphs 1-171 of the New Matter are incorporated as if fully set forth herein.

174. The Complaint fails to state a claim upon which relief can be granted because 52 Pa. Code § 59.33 does not impose any safety standards on natural gas public utilities beyond those issued under the federal pipeline safety laws found in 49 U.S.C.A. §§ 60101-60503 and as implemented at 49 C.F.R. Parts 191-193, 195 and 199, and PECO has complied with those federal pipeline safety laws and regulations.

THIRD AFFIRMATIVE DEFENSE

175. All allegations in paragraphs 1-171 of the New Matter are incorporated as if fully set forth herein.

176. Under the PA One Call Law, the General Assembly has vested authority in the Department of Labor and Industry, not the Public Utility Commission, to enforce violations of the PA One Call Law:

(c.1) In addition to any other sanctions provided by this act, the department shall have the authority to issue warnings and orders requiring compliance with this act and may levy administrative penalties for violations of this act. Any warning, order or penalty shall be served on the person or entity violating the act at their last known address. The department shall consider the factors set forth in subsection (e) in determining the administrative penalty to be

assessed. Any party aggrieved by the imposition of an order or administrative penalty imposed by the department may appeal such order or penalty as provided in 2 Pa.C.S. Ch. 5 Subch. A (relating to practice and procedure of Commonwealth agencies) and Ch. 7 Subch. A (relating to review of Commonwealth agency action).

...

(f) The secretary or his designee shall have the authority to issue subpoenas, upon application of an attorney responsible for representing the Commonwealth in actions before the department, for the purpose of investigating alleged violations of this act. The department shall have the power to subpoena witnesses and compel the production of books, records, papers and documents as it deems necessary or pertinent to an investigation or hearing.

73 P.S. §§ 182.2(c.1), (f).

177. Inasmuch as the subject matter of the Complaint is compliance with the PA One Call Law, the Commission lacks jurisdiction over the subject matter of the Complaint.

FOURTH AFFIRMATIVE DEFENSE

178. All allegations in paragraphs 1-171 of the New Matter are incorporated as if fully set forth herein.

179. The Complaint fails to state a claim upon which relief can be granted because PECO at all times complied with the requirements of the PA One Call Law.

FIFTH AFFIRMATIVE DEFENSE

180. All allegations in paragraphs 1-171 of the New Matter are incorporated as if fully set forth herein.

181. The Complaint fails to state a claim upon which relief can be granted because the Public Utility Commission may not impose duties on facility owners (public utilities) regarding the Pennsylvania One Call System that differ from those imposed by the General Assembly in Section 2 of the PA One Call Law.

SIXTH AFFIRMATIVE DEFENSE

182. All allegations in paragraphs 1-171 of the New Matter are incorporated as if fully set forth herein.

183. The proximate cause of the incident was the failure to submit a locate request for the light pole installation activities, and none of PECO's conduct was the proximate cause of the incident. If Eastern Caisson had made the One Call request, the following would have occurred:

- PECO's Gas Damage Prevention procedure would have been triggered;
- PECO would have visited the site to review the accuracy of its markings;
- PECO would have determined whether it was a high profile request; and
- PECO would have communicated with Eastern Caisson.

SEVENTH AFFIRMATIVE DEFENSE

184. All allegations in paragraphs 1-171 of the New Matter are incorporated as if fully set forth herein.

185. Even if any of PECO's actions was a proximate cause of the incident, the failure to submit a locate request for the light pole installation activities was a superseding cause of the incident.

EIGHTH AFFIRMATIVE DEFENSE

186. All allegations in paragraphs 1-171 of the New Matter are incorporated as if fully set forth herein.

187. PECO had neither actual nor constructive notice that Eastern Caisson would fail to comply with its duties and responsibilities under the PA One Call Law.

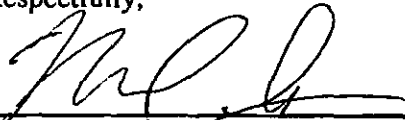
188. Eastern Caisson's violation of the PA One Call Law was unforeseeable.

189. As a matter of law, PECO has no duty to erect safeguards against risks that are unforeseeable or to prevent unforeseeable conduct.

190. It is contrary to public policy for PECO to be held liable, by means of an enforcement proceeding, for third-party conduct that is unforeseeable.

WHEREFORE, PECO Energy Company respectfully requests that the Commission deny the relief requested by the Bureau of Investigation and Enforcement of the Pennsylvania Public Utility Commission and

Respectfully,



Dated: January 8, 2016

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VERIFICATION

I, Brian Camfield, hereby state that I am Manager of Gas Engineering and Asset Performance for PECO Energy Company; that I am authorized to make this Verification on behalf of Respondent PECO Energy Company; and that the statements made in the foregoing are true and correct to the best of my knowledge, information, and belief. I understand that the statements herein are subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.

Date: January 8, 2016



Brian Camfield


CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing Notice to Plead and Answer and New Matter of Respondent, PECO Energy Company upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

Notification by First Class Mail addressed as follows:

Heidi Wushinske, Esq.
Michael L. Swindler, Esq.
Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Dated: January 8, 2016



Thomas M. Duncan

EXHIBIT A

RECEIVED

JAN 8 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU



An Exelon Company

Gas Damage Prevention

PECO Administrative Procedure

GO-PE-9003

Revision No.: 2

RECEIVED

JAN 8 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Effective: 4/26/2013
Supersedes: GO-PE-903
Level: 3
Review Type: 1 Year
Core Function: Operate & Restore

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1. Purpose

- 1.1. This program is written to comply with Pennsylvania Act 187 and the Code of Federal Regulations 49CFR 192.614.
- 1.2. A portion of Gas Operations Damage Prevention Program is fulfilled by participation in the Pennsylvania One-Call System (POCS). The System allows communication between designers, contractors, and excavators to notify all member utilities in the system (including PECO Energy or its authorized locating agent) by placing only one phone call. More information on POCS is available in Attachment GO-PE-9003-1.

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2. Precautions and limitations

2.1. Precautions

2.1.1 None.

2.2. Limitations

2.2.1 IF a contractor is not responsive to or is in violation of the Pennsylvania Underground Utility Line Protection Law (PA Act 287 of 1974 as amended by Act 187 of 1996, 73P.S. & 176 et.seq.), THEN the Claims and Security Division and/or local police authorities shall be contacted to initiate injunctive action against the contractor to protect PECO Energy facilities.

2.2.2 The information set forth in this procedure represents the minimum requirements for the protection of PECO Energy facilities. Field conditions may require additional restrictions.

3. Prerequisites

3.1. None

4. Procedure

4.1. PECO Energy Use of POCS

4.1.1 PECO Energy will make the proper notifications to POCS in accordance with the Underground Utility Line Protection Law, PA Act 287 of 1974 for:

- 4.1.1.1 Design work
- 4.1.1.2 Demolition work
- 4.1.1.3 Routine/Planned excavation work
- 4.1.1.4 Emergent excavation work

4.2. Prior to Excavation Activities

4.2.1 Damage Prevention and/or authorized locating agent, will **CONDUCT**, where appropriate, a pre-excavation meeting with the excavator to discuss all aspects of the planned excavation activities.

- 4.2.1.1 The following excavation activities require pre-construction study and planning due to the possible impact on facilities and their surrounding supporting soil and are prime candidates for re-inspection by company personnel:

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1. *Blasting*
 2. *Boring*
 3. *Tunneling*
 4. *Backfilling in proximity to PECO facilities*
 5. *Removal of above ground structure by explosive or mechanical means*
 6. *Moving operations (e.g., large excavations, foundation work, underground tank removal, grading, etc.)*
- 4.3. **During Excavation Activities**
- 4.3.1 Exelon crews and COC's will excavate in accordance with the Exelon Rules to Dig By work practice (see Attachment GO-PE-9003-6)
- 4.4. **After Excavation Activities**
- 4.4.1 **PERFORM** a leakage survey, in accordance with leak survey procedures, over any gas facilities that had the potential of being affected during excavation activities.
- 4.4.2 **PERFORM** surveillance for settlement of backfilled excavations and related secondary construction work, such as sewer lateral connections.
- 4.4.3 **IF** damage to protective coatings or cathodic protection facilities is suspected, **THEN NOTIFY** the Corrosion Control Division in order that tests may be conducted promptly to verify coating integrity and continuity of anode protection systems.
- 4.4.4 **IF** it is suspected excavator has violated PA Act 187; **THEN NOTIFY** PA Dept. of Labor and Industry via Utility Line Protection Act Incident Report

5. **Roles and responsibilities**

- 5.1. PECO's Construction & Maintenance Damage Prevention organization provides the following services:
- 5.1.1 Damage Prevention Inspectors who provide for the safety of the general public and PECO's Facilities in areas where excavation activity is ongoing.
 - 5.1.2 Proactive education of excavators and the general public about PA One Call Law, CFR title 49 parts 192.614 & 192.755, and PECO Energy Underground Construction Standards.

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- 5.1.3 Maintaining, tracking, and analyzing damage data to identify trends and recommend solutions to proactively reduce damages due to excavation work on the PECO system.
- 5.2. POCS provides the following services:
 - 5.2.1 Listing and maintaining on a current basis, organizations and persons that might engage in excavation activities in the service area.
 - 5.2.2 Education of the public of the existence and purpose of damage prevention procedures.
 - 5.2.3 Yearly notification, by direct mailing, of organizations and persons identified as being involved in excavation activities.
 - 5.2.4 Explaining how to learn the location of underground pipelines.
 - 5.2.5 Maintaining a record of all incoming and outgoing requests to or from parties involved in excavating activity or being notified of an excavation.
- 5.3. Damage Prevention - PECO
 - 5.3.1 Manager, Damage Prevention
 - 5.3.1.1 Provides oversight and direction to the Damage Prevention function
 - 5.3.1.2 Oversees the day-to-day activities of the locating vendor
 - 5.3.1.3 Manages and Maintains external industry and association relationships
 - 5.3.1.4 Participates as an active member of the PA 1 Call Board of Directors
 - 1. Attend PA1 Board Meeting 4 times per year
 - 5.3.1.5 Participates in Outreach Programs
 - 1. Philadelphia Water Department
 - 2. American Water
 - 3. STS Locators
 - 4. Verizon FTTP/FIOS
 - 5. Bucks County Municipal Forum
 - 6. Montgomery County Municipal Forum
 - 7. Chester County Municipal Forum
 - 8. PECO COC Damage Prevention Reviews
 - 9. Shainline
 - 10. Delmont
 - 11. Caddick
 - 12. Brubacher
 - 13. Bulldog
 - 5.4. Analyst, Damage Prevention
 - 5.4.1 Maintains a database to track all damage data caused by excavation work

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- 5.4.2 Produces monthly reports to identify trends and recommend programmatic changes to reduce damages
- 5.4.3 Liaison between PA 1 Call, external contractors and locating vendor for emergent issues
- 5.4.4 High Profile Contractor list
- 5.5. Supervisor, Damage Prevention
 - 5.5.1 Provides direct supervision and direction to Damage Prevention Inspectors
 - 5.5.2 Interacts with locating vendor and external contractors
 - 5.5.3 Provides education and assistance to field employees as needed
- 5.6. Damage Prevention Inspector
 - 5.6.1 Resolves, or refers to other PECO groups, customer concerns that arise in the field when working around PECO facilities.
 - 5.6.2 Audits and documents PECO Energy locating agent's proper identification of underground facilities of High Profile jobs.
 - 5.6.3 The Damage Prevention Inspectors will consider the following factors in determining the need for and extent of audits/inspections:
 - 5.6.3.1 The type and duration of the excavation activity involved
 - 5.6.3.2 The proximity to the operator's facilities
 - 5.6.3.3 The type of excavating equipment involved
 - 5.6.3.4 The importance of the operator's facilities
 - 5.6.3.5 The type of area in which the excavation activity is being performed
 - 5.6.3.6 The potential for a serious incident should damage occur
 - 5.6.3.7 The past experience of the excavator
 - 5.6.3.8 The potential for damage occurring that may **not** be easily recognized by the excavator, such as improper support during excavation and backfill
 - 5.6.3.9 The potential for facility markings to become obscured
 - 5.6.4 Inspections will include but are not limited to the following actions:
 - 5.6.4.1 **LOCATE AND CHECK** distribution valves and other means of emergency shutdown in the event they are necessary for control.
 - 5.6.4.2 **CONFIRM** excavator has valid POCS request
 - 5.6.4.3 **REVIEW** POCS request work scope **INSURE** excavator and locator have same understanding of extent of job site
 - 5.6.4.4 **IDENTIFY** type and/or size of PECO facilities in conflict, **DETERMINE** schedule of when those facilities will be exposed and/or crossed

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- 5.6.4.5 **INSURE** excavator has knowledge of proper clearances and backfill techniques for respective facility type.
- 5.6.4.6 Completion of all required fields on the electronic inspection report
- 5.6.4.7 **DOCUMENT** all site meetings before or during excavation via electronic inspection report
- 5.6.4.8 **REVIEW** of locator mark accuracy
- 5.6.5 Lending assistance and training to contract locators as necessary to identify PECO facilities.
- 5.7. Construction Designers
 - 5.7.1 Shall **at least** ten (10) working days in advance, but not more than ninety (90) working days in advance of the final design CALL POCS **AND GIVE** the call taker the required information in accordance with the law
 - 5.7.1.1 **RECORD** the following:
 1. Serial number identifying the request for information
 2. POCS phone number
 3. **SHOW** on job sketch all PECO & foreign (if known) underground facilities in the work area
 4. **LIST** (adjacent to the title block) companies to be contacted prior to construction (names, phone number, and notification serial number)
- 5.8. Gas Field Personnel
 - 5.8.1 **CALL** POCS [**not** less than three (3) **nor** more than ten (10) working days prior to start] for routine/planned excavation work
 - 5.8.2 **CALL** POCS immediately for emergent excavation work
 - 5.8.3 Ensure all facility owners have responded to the POCS request prior to beginning excavation
 - 5.8.4 Excavate in accordance with the Exelon "Rules to Dig By"
 - 5.8.5 **MAINTAIN** all markings of facility locations in the work area during construction to ensure awareness of utility locations.
- 5.9. Exelon Authorized Locating Personnel
 - 5.9.1 Routine, Demolition, and Emergent Excavation Notifications
 - 5.9.1.1 Receive and respond to all POCS requests within the prescribed legal timeframes.

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1. **IDENTIFY** (mark, stake, locate, or otherwise provide position of) PECO underground gas, electric, water and fiber lines within the scope of the work site.
 - a. In such cases where identification cannot be performed within the legal timeframe **NOTIFY** the contractor via POCS, KARL (Kathy Automated Response to Locate System) conflict may exist and attempt to make direct contact, if an extension is granted from contractor **DOCUMENT** such.
 1. **IDENTIFY** position of underground lines at the site within 18 inches horizontally from outside wall in such a manner to enable the contractor to employ prudent techniques (e.g., hand dug test holes) to determine the precise position of underground lines.
 2. **PERFORM** the above identification utilizing PECO Energy records, and by use of standard locating techniques other than excavation as prescribed in the "10 Steps to a Proper Locate", Attachment GO-PE-9003-8.
 3. PECO Energy may **PERFORM** excavation around its facilities in fulfillment of its locating responsibilities.
 4. **FOLLOW** designated color codes for utilities:
 - a. High Visibility Safety Yellow - Gas Distribution and Transmission
 - b. Safety Red - Electric Power Distribution and Transmission
 - c. Safety Red - Cathodic Protection Facilities
 - d. Safety Orange – Fiber Optic or other PECO Telecom Facilities
 - e. Blue – PECO water lines (feed to Limerick Nuclear Plant)
 5. **IDENTIFY** the size of the facilities if over 2".
 - a. Do **not** give facility depth.
- 5.9.1.2 Fax a copy of all Demolition POCS requests to the appropriate PECO Contractor and Builder Services organization
- 5.9.1.3 **DOCUMENT** results of locate by completing all required documentation on the electronic close screen within the ticket management system with positive response to the POCS KARL system
- 5.9.1.4 Identify High Profile jobs to PECO Damage Prevention Inspectors in accordance with the High Profile work process (see Attachment GO-PE-9003-5, Page 4 of 4) which include:
1. Cast Iron gas mains
 2. Transmission Gas pipelines

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3. Large Gas Distribution mains
 4. Gas Gate Station and Regulator Stations
 5. Directional Boring/Drilling Work
 6. Long jobs
 7. Blasting
 8. Road Widening
 9. High Profile Contractor
 10. High Profile Customer
 11. Problem locate jobs
 12. Heavy underground locations
 13. PECO Facility record discrepancies
- 5.9.1.5 Maintain an electronic record of the disposition of all POCS requests as specified in the contractual agreement with PECO
- 5.9.1.6 Provide access to the POCS request software to PECO Energy for purposes of viewing the disposition of requests and retrieving tickets of special interest. (Example, requests by a specific contractor, or work proposed in specific areas.)
- 5.10. Design Notifications
- 5.10.1 Receive and process all POCS Design requests within the prescribed lawful timeframe
- 5.10.2 Review work scope identified on the Design request with PECO facility records
- 5.10.3 Send letter in accordance with the Design Ticket work process (see Attachment GO-PE-9003-7) to the designer indicating conflicts/no conflict
- 5.10.3.1 Enclose copies of PECO Energy underground facility maps with all conflict responses
- 5.10.4 Maintain a copy of the response to the designer and an electronic record of the disposition of the POCS requests as specified in the contractual agreement with PECO
- 5.10.5 DOCUMENT results of completion of the design request by completing all required documentation on the electronic close screen within the ticket management system with positive response to the POCS KARL system
- 5.10.5.1
- 5.11. Letters and Calls Received Outside POCS
- 5.11.1 Non-emergency
- 5.11.1.1 IF calls or letters are received directly from designers/excavators that are not related to the direct work of the locating vendor, THEN DIRECT them to call the regular POCS number:
1. Calls made from within Pennsylvania - 1-800-242-1776

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2. Calls from outside of Pennsylvania - 1-800-248-1786

5.11.2 Emergency

- 5.11.2.1 IF a call is received reporting damage or imminent damage to PECO Energy facilities, THEN REFER the caller to the PECO Energy emergency number (1-800-841-4141, option #1) and PA 1 Call at 1-800-242-1776.

6. Documentation

- 6.1. None.

7. Terms and definitions

- 7.1. Facility Owner: Public utility, political subdivision, municipality, authority, rural electric cooperative or its named representative trade association, or other person or entity who or which owns or operates an underground line.
- 7.2. Excavation Work: The use of powered equipment or explosives in the movement of earth, rock or other material, and includes but is not limited to anchoring, augering, backfilling, blasting, boring, digging, ditching, drilling, driving-in, grading, plowing-in, ripping, scraping, trenching and tunneling.
- 7.3. Demolition Work: The partial or complete destruction of a structure, by any means, served by, or adjacent to a line or lines.
- 7.4. PECO Energy Emergency Number: 1-800-841-4141, Option #1
- 7.5. POCS: Pennsylvania One Call System
- 7.5.1 POCS Telephone Numbers:
- 7.5.1.1 ALL Areas: 811
- 7.5.1.2 From within Pennsylvania: 1-800-242-1776
- 7.5.1.3 From outside Pennsylvania: 1-800-248-1786

8. References

- 8.1. Supersedes OP-X-505-DAMAGE PREVENTION
- 8.2. Supersedes Gas Instruction Letter, Mains and Services, Mains, General 1-7, Damage Prevention Program
- 8.3. Supersedes Gas Distribution Foreman's Manual III-A-4, Damage Prevention Program
- 8.4. Code of Federal Regulations 25CFR 211.62

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- 8.5. Code of Federal Regulations 29CFR 1926.651
- 8.6. Code of Federal Regulations 29CFR 1926.850
- 8.7. Code of Federal Regulations 29CFR 1926.900
- 8.8. Code of Federal Regulations 49CFR 192.614
- 8.9. DS-X-107, Pennsylvania One-Call System (POCS)
- 8.10. Procedure GO-PE-309-Repair and Replacement of Gas Mains and Services
- 8.11. Procedure GO-PE-104-Gas Leakage Surveys
- 8.12. Procedure OP-G-515, Procedure for Handling and Recording Outside Leaks
- 8.13. Pennsylvania Act 187

9. Attachments

- 9.1. GO-PE-9003-1, Pennsylvania One Call System Information
- 9.2. GO-PE-9003-2, 29CFR 1926, Subpart P Excavations, Trenching And Shoring
- 9.3. GO-PE-9003-3, Title 25 - Rules And Regulations, Chapter 211 - Storage, Handling And Use Of Explosives; Section 211.62 - Blasting in the vicinity of utility lines
- 9.4. GO-PE-9003-4, PECO Facilities Audit Report
- 9.5. GO-PE-9003-5, High Profile Process
- 9.6. GO-PE-9003-6, Rules to Dig By
- 9.7. GO-PE-9003-7, Design Ticket Process
- 9.8. GO-PE-9003-8, Ten Steps to a Proper Locate
- 9.9. GO-PE-9003-9, Screen Captures

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10. Development history

Revision 0		Date: 10/26/2004
Writer	Kathy Lloyd (Damage Prevention), William Nuss (Gas Engineering)	
Reviewer(s)	John Frantz (Gas Engineering);	
Technical Approver(s)	John Frantz (Manager, Gas Engineering), Marie Furey (Manager, Damage Prevention);	
Safety Approver(s)	Approver's name and work group;	
UFAM Approver(s)	UFAM Name, core function and title	
Reason written	Rewrote procedure to focus on natural gas damage prevention. Updated organizational names and re-formatted in accordance with the Exelon management Model. THIS PROCEDURE REPLACES OP-X-505.	

Revision 0		Date: 5/12/2008
Writer	Gary Bartnik (Damage Prevention)	
Reviewer(s)	Gas Engineering	
Technical Approver(s)	Approver's name and work group;	
Safety Approver (s)	Approver's name and work group;	
UFAM Approver(s)	Diane DiMarco	
Reason written	Updated Manager responsibilities. Replaces GO-PE-903	

Revision 1		Date: 11/7/2011
Writer	Maureen Ludwick (Damage Prevention)	
Reviewer(s)	Rob Bedics (Damage Prevention)	
Technical Approver(s)	Approver's name and work group;	
Safety Approver(s)	Approver's name and work group;	
UFAM Approver(s)	Steve Singh (Gas Asset & Perf.)	
Reason written	To provide instructions to prevent excavation or demolition work from damaging PECO underground pipelines.	



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Revision 2		Date: 4/8/2013
Writer	Click here to enter text.	
Reviewer(s)	Click here to enter text.	
Technical Approver(s)	Approver's name and work group;	
Safety Approver(s)	Approver's name and work group;	
UFAM Approver(s)		
Reason written	Click here to enter text.	

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PENNSYLVANIA ONE-CALL SYSTEM INFORMATION

When a designer or contractor contacts POCS, the operator gives the caller a serial number and inputs the information received from the caller into a computer. The computer transmits this information to each member who has underground facilities in the political subdivision where the excavation is to take place.

Printers have "answer back" feature that enables the computer to determine if each receiver for which a message is intended is operative at the beginning and end of each message. If a receiver is inoperative at either time, then the message is repeated after a short interval. If the receiver still does not respond, an operator will telephone the message and notify the receiving location that its printer is inoperative.

When POCS receives an emergency call reporting damage or imminent damage to a member's underground facilities, the caller is given a notification serial number and told to call the affected company directly at the supplied emergency phone number. The computer also electronically sends a confirming message to all members who have underground facilities in the political subdivision.

POCS has been given the hours that the receiver is manned including a list of holidays PECO Energy observes. Any calls received at night, on weekends, or on a holiday that requires action before the printer is scheduled to be manned will be phoned to the PECO Energy authorized locating agent's answering service. The proper emergency telephone number and a confirming order will electronically be sent to the printer.

Attachment GO-PE-9003-1

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29CFR 1926. SUBPART P EXCAVATIONS, TRENCHING AND SHORING

The estimated location of utility installations, such as sewer, telephone, fuel, electric, water lines, or any other underground installation that reasonably may be expected to be encountered during excavation work, shall be determined prior to opening an excavation.

Utility companies or owners shall be contacted within established or customary local response times, advised of the proposed work, and asked to establish the location of the utility underground installations prior to the start of actual excavation. When utility companies or owners cannot respond to a request to locate underground installations within 24 hours (unless a longer period is required by state or local law), or cannot establish the exact location of these installations, the employer may proceed, provided the employer does so with caution, and provided detection equipment or other acceptable means to locate utility installations are used.

When excavation operations approach the estimated location of underground installations, the exact location of the installations shall be determined by safe and acceptable means.

"Subpart T" - Demolition; Section 1926.850 - Preparatory Operations (c) All electric, gas, water, steam, sewer and other service lines shall be shut off, capped or otherwise controlled, outside the building line before demolition work is started. In each case, any utility company that is involved shall be notified in advance

"Subpart U" - Blasting and the use of explosives; Section 1926.900 - General Provisions (o)

Blasting operations in the proximity of overhead power lines, communication lines, utility services or other services and structures shall not be carried on until the operators and/or owners have been notified and measures for safe control have been taken.

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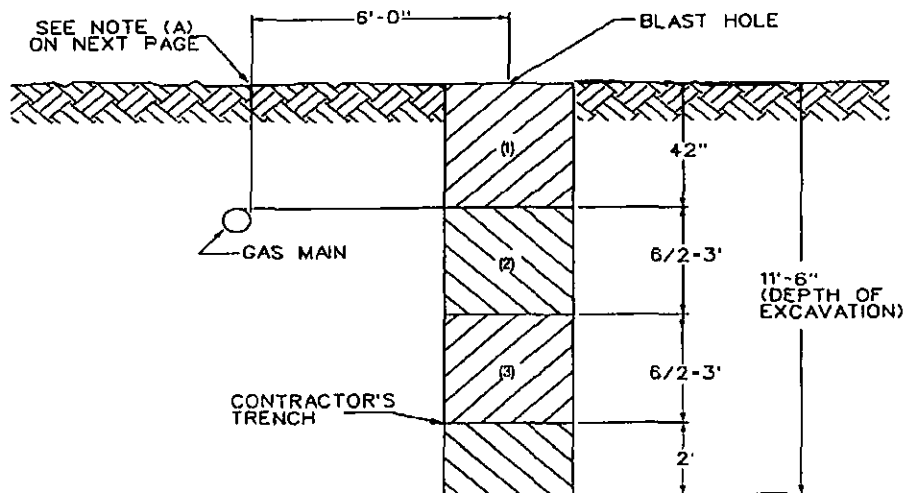
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TITLE 25 - RULES AND REGULATIONS, CHAPTER 211 - STORAGE, HANDLING AND USE OF EXPLOSIVES; SECTION 211.62 - BLASTING IN THE VICINITY OF UTILITY LINES.

These regulations set forth the blasting requirements in the vicinity of utility lines. They require the blaster to inform himself or herself of the location of underground utilities and to use a drilling pattern and blast initiation procedure that will provide the greatest possible relief in a direction away from utility lines. Item (d) of this Section reads as follows:

- (d) All blasting in the vicinity of utility lines shall be conducted as follows:
 - (1) Excavation from the surface to a depth corresponding to the elevation of the top of the buried utility can proceed at the discretion of the blaster using accepted techniques.
 - (2) When the excavation has attained a depth equal to the elevation of the top of the buried utility line or if the line is exposed in and makes solid contact with the surface, the vertical depth of subsequent blast holes will be restricted to one-half the horizontal distance from the closest portion of the pipeline. In this instance, blast hole diameter will be restricted to a maximum of three inches with no more than one hole being initiated per delay period.

An example of the requirements of Item d is shown in the diagram below and explained in the following text.



Attachment GO-PE-9003-3

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- (1) The contractor should drill and blast in four steps, removing material after each step.
- (2) Contractor may remove this trench section down to an elevation equal to the depth of the buried facility (in this case 42 inches). If blasting is used for this section of trench, then the drill hole for the charge may not be greater than 42 inches in depth.
- (3) The vertical depth of the drill hole for a blasting charge in this section is limited to one-half the horizontal distance from the closest portion of the buried facility (in this case, $6 \times \frac{1}{2}$ or 3 feet).
- (4) The removal of this section and every succeeding section will be identical to section 2 with the blast hold depth being limited to one-half the horizontal distance from the closest portion of the buried facility.

NOTE A: Underground facilities shall be marked on the surface prior to construction. The contractor is responsible for determining the exact location of the underground lines, but when mutually agreeable, a distance of 18 inches each side of the marked location may be used as the designated near edge of the line.

A blasting contractor may apply for a change in these requirements if one or more of these regulations provide an operational or safety-oriented hardship. Application must be made to the Department of Environmental Resources for a waiver of the regulation(s) in question. This waiver may be granted if, in the judgment of the Department, the alternative procedure does not endanger the utility line. Any waiver should be made known to the utilities involved.

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HIGH PROFILE PROCESS

PURPOSE

To provide general guidelines to the S.T.S., Inc. workforce and PECO Dig Safe employees in the function and use of the High Profile Reporting tool located on the S.T.S., Inc. web page.

TERMS AND DEFINITIONS

High Profile: PECO Energy's numeric designation for PA 1 Call tickets received by S.T.S., Inc. that may require further action by a PECO Damage Prevention Inspector.

High Profile Reporting Tool – S.T.S., Inc. web-based PA 1 Call ticket management system (www.stsus.net) Custom Reports/High Profile

High Profile Designation Numbers – See attachment #1

PA 1 Call System, Inc. (PA 1 Call) – non-profit Pennsylvania corporation created to protect the underground facilities of members through communication with any person(s) planning to disturb the earth.

PA 1 Call Ticket – Routine, Dig Up, Emergency, and Design notifications to facility owners of specific excavation information so that the lines can be marked

Dig Up Ticket – PA 1 Call tickets called in for a mark out by excavators who have hit/damaged an underground facility line

Emergency Ticket – PA 1 Call tickets called in by excavators for a mark out who need to dig on a job that involves a clear and immediate danger to life or property

Routine Ticket – PA 1 Call tickets called in by excavators for a mark out under normal conditions not addressed by a Dig Up or Emergency ticket

Demolition Ticket – PA 1 Call tickets called in by excavators for a mark out under normal conditions not addressed by a Dig UP or Emergency ticket where the excavator will demolish the building/facility

Design Stage Ticket – PA 1 Call tickets called in by design firms, engineering firms, and contractors requesting prints of underground facilities during the design phase of a project prior to excavation

Damage Prevention Specialist (DPS) – S.T.S., Inc. field employee responsible for marking PECO underground facilities and completing PA 1 Call tickets

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Damage Prevention Inspector (DPI) – PECO Energy field employees responsible for proactive damage prevention of PECO underground facilities

S.T.S., Inc. – PECO Energy's locating vendor responsible for completing PA 1 Call tickets in Bucks, Chester, Delaware, Montgomery and York Counties

RESPONSIBILITIES

S.T.S., Inc. DPS

Marks out and or clears Dig UP, Emergency, Routine, and Demolition PA 1 Call tickets received as per the scope specified on the PA 1 Call ticket

Identifies High Profile jobs as per Attachment #1 on Emergency, Routine, and Demolition and Dig Up tickets only.

Design tickets do not require a High Profile designation

On the S.T.S., Inc. ticket management completion screen:

- Clicks on the High Profile option and notes the High Profile designation number(s) in the Film Roll section using the following format standards:
- Enter number only. Do not use # of other symbols (e.g. 1)
- Separate multiple designation numbers with a comma (e.g. 1,5)
- If the high profile designation number(s) is the same for both the electric and gas, only check the High Profile option and enter the number(s) in the Film Roll Field for either the electric or gas completion screen area. Do not enter duplicate information in both completion screens.
- If the gas and electric high profile reasons are different, check the high profile option and enter the appropriate number in the film roll field of each completion screen

Clicks on the appropriate close codes (e.g. Painted, Flagged, Excavation Site Clear)

Enters the PECO print # in the Plat# field

Enters any necessary comments in the Driver Remarks

Notifies S.T.S., Inc. supervisor immediately of any PA 1 Call tickets designated with an 8 (Problem Locate)

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Notifies S.T.S., Inc. Supervisor immediately of any tickets designated with a 7R (PECO gas regulator station)

S.T.S., Inc. Supervisor

Reviews the High Profile Report daily to ensure tickets are properly coded

When notified by S.T.S., Inc. DPS of a 7R, PECO Regulator Station:

- Immediately calls the PECO DOC at (610) 941-1599.
- Documents, in writing, the date, time, and name of PECO employee notified

When notified by S.T.S. DPS of a Problem Locate (High Profile number 8), assists the DPS in locating the facilities.

Contacts the designated County DPI for assistance when necessary

Notifies the PECO Dig Safe Analyst at (610) 941-1631 with any changes to the High Profile Report

PECO DPI

Reviews the High Profile Report on the S.T.S., Inc. web site daily for tickets in their assigned county

Prioritizes the work giving high priority to cast iron, problem contractors, and problem locates for follow-up action

Tickets designated 7S (substation) or 7G(gate station):

- Determine if scope of work is inside the perimeter of the station
- Work with PECO T & S personnel to complete the mark out within the perimeter of the PECO sub-station or gate station

Makes field visit/inspections/audits/contact as necessary

Completes a PECO Damage Prevention audit report for every audit conducted

Returns all completed audits and summary to PECO Dig Safe Supervisor weekly

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ATTACHMENT 1

CRITERIA #	CRITERIA	HIGH PROFILE
1	CAST IRON MAIN	In the scope of the job.
2	LONG JOB	Greater than 500 feet.
3	GAS TRANSMISSION	Print shows (---N---PE---N---), (--- NG ---), (---Do Not Tap---).
	GAS LARGE DISTRIBUTION MAINS	Mains equal to and greater than 10 inch.
	ELECTRIC TRANSMISSION	Greater than 34,000 volts.
	WATER TRANSMISSION	Cooling water supply lines. (Bucks & Mont. Co. only)
4	BLASTING	Identified on ticket, and anywhere in the vicinity of the job scope.
5	HIGH PROFILE CONTRACTOR	From the High Profile Contractor List.
6	HEAVY UNDERGROUND	Very congested map.
7	REGULATOR / GATE / SUB-STATION	Anywhere in the vicinity of the job scope.
8	PROBLEM LOCATE	The Locator & Supervisor have exhausted all resources & CNL.
		Supervisor calls PECO DPI immediately
10	DIRECTIONAL BORING / DRILLING	In the scope of the job.
11	ROAD WIDENING	All tickets called in for road widening projects
12	HIGH PROFILE CUSTOMER	Questionable locates involving schools, hospitals, nursing homes, And other facilities where evacuations can occur

9 is not a criteria.

One of the following must be noted
in locator remarks !

When # 9 is selected, It is notification of :	
9	No Print = No Sketch, No Map, No Record. Nothing!
9	Blank Print = No info on print, record, or map.
9	Insufficient information on print, record, or map.
9	Incorrect Information on print, record, or map = DDIF !

Dig Safe 12/10/2002

Attachment GO-PE-9003-5

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Rules to Dig By

Verify One-Call tickets

Check Year: Date, time, location, scope and extent of ticket

Location: Key marks, old marks, and Pumping Facility Marked

Stop: Stop, Work Orders, and Piping

Investigate File: Transformation, Codebook, Downcode, and fields

Work Method: Depth of the location of One-Call tickets to call again

Call One-Call: Check through the Mark or Controlling Mark

Side 1

Utilize the STAR process

Review: Accuracy of equipment, depth of tickets, and marks are accurate, and the location of the depth of the marks to ensure there are no underground utilities

Inspect: Use power of equipment, such as depth, backhoes and augers, until you have sufficient marks to ensure

Hand Dig: To verify facilities when working with tickets

Call: Notify the provider when marks are in question

Respect: All One-Call marks, even valve call back

A DIG TICKET IS NOT A LICENSE TO DIG.

Side 2

 = .625" x .125" SLOT (1)

Part #:	CE-RULES/DIG-CARD	Size:	3.375" x 2.125" w/ .125" rc	Proof Level:	F
Colors:	Yellow on Red	File:	CE-RULES, DIG-CARD.F.ai	Date:	11/7/03
Construction:	Provided on Quotation No.: 22735			Scale:	100%

NOTE: This is a proof of your artwork. Please review the text, size, style, spelling, and locations for errors. Upon receipt of your approval, your order will be printed according to this proof. Your order cannot be processed further until approval is received. No credit will be given for product which conforms to this proof.

APPROVED AS IS APPROVED WITH CORRECTIONS CORRECTED PROOF REQUESTED



(847) 918-3700 • Fax: (847) 918-3701

Signature

Date

Attachment GO-PE-9003-6

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DESIGN STAGE TICKETS

PURPOSE

To provide general guidelines on the process to complete PA 1 Call Design ticket requests

PROCESS

STS, Inc.

Receives all Design request tickets from PA 1 Call

Reviews the scope of the ticket and prints all appropriate PECO underground facility maps within the defined job scope

Completes the PECO/STS Design Ticket form letter (Attachment 1)

Mails the letter and any PECO underground facility maps found within the scope of the PA 1 design ticket to the contact information specified in the PA 1 Call ticket

Maintains a file of all Design request tickets including:

- o A copy of the PA 1 Call ticket
- o A copy of the form letter
- o A record of the prints that were sent

Closes the PA 1 Call ticket using the #2 "Conflict Lines Nearby, Direct Contact to follow by Facility Owner" KARL response code

Attachment GO-PE-9003-7

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eSketch™ Documentation Requirements

Documentation Requirements

A sketch in eSketch™ is required anytime and every time you status a client on a ticket.

Whether the status change is from “-R,” ready to mark, to “M,” marked, or from “O,” ongoing, to “NL,” no locate required, a sketch is required. Any status change always requires an eSketch™.

An eSketch™ must be done every time you go to a site. For example, you may locate 500 feet a day on a long job. Sketch what you do every day. Or you may go to a site with a locked gate. Create an eSketch™ while you are onsite that documents that you were there and why you could not perform the locate at that time.

***100% of the tickets you work will have an eSketch™. ***

Marked Tickets:

Sketch complete and GPS position is recorded on site.

Utilities are accurately drawn.

Tie downs are included according to the company’s tie-down best practices.

All other eSketch™ requirements are met, including legal signature.

Marking may be complete in one or more visits due to circumstance. Do an eSketch™ for each visit.

NOTE

Note: All sketches must be started and ended on site. At no time is it acceptable to leave a site with eSketch™ open and running. All sketches must be completed prior to driving off to the next site / location.

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The 10 Fundamental Steps of Quality Locating

Step 1: Follow safety procedures and use safety equipment!

- Drive safely and obey all traffic laws.
- Stop your vehicle to check maps; never look at a map or tickets while driving.
- Use hazard lights when your vehicle is stopped.
- Wear a warning vest at all times.
- Always wear a seat belt while driving.
- Safely back up your vehicle into parking spots.
- Place a safety cone behind your vehicle and use other safety cones as needed.
- Wear a hardhat when necessary (e.g., at Construction Sites.)

Step 2: Read the entire ticket carefully!

- Check the date when the excavation work is expected to begin.
- Check the address of the locate.
- Check the marking instructions for the locate.
- Check the deadline for completing the locate.
- Determine what locating needs to be performed.

Step 3: Scan the entire area of the locate!

- Look for visible, aboveground signs of what might be buried underground.
- Take note of physical evidence, such as manhole covers, valve boxes, pedestals, overhead lines, poles, gas meters, and transformers.

Step 4: Check all prints and records before starting the locate!

- Identify the types of facilities in the area.
- Determine the general location of facilities in the area.
- Note the depth of facilities if information is provided.
- Determine the size of facilities in the area.
- Determine the amount of congestion in the area.

Step 5: Apply the signal appropriately and create a good ground!

- Use direct connection as your first choice for applying the signal.
- Use induction as a last choice.
- Use an approved ground stake or rod.
- Scrape off rust, scale, or paint from the access point for proper electrical connections.
- If the soil is dry or compacted, pour water over the ground stake/rod.
- Use clamping only if direct connection cannot be used.
- Avoid marking location by print measurements only.
- Appropriately position the ground stake/rod to promote the strongest signal.
- If necessary, unbond facilities by removing all grounding devices.

Step 6: Use appropriate power and frequency settings!

- Select a signal frequency that is suitable for the job.
- If the initial frequency setting is not effective, switch to another frequency that works better.
- Use the lowest possible power setting that will produce a detectable signal.
- For most situations, start with a 25-33kHz radio frequency setting.
- Make sure that both the transmitter and receiver are set to the same signal frequency.
- If the response on the receiver is too strong, reduce receiver sensitivity.

Step 7: Trace and dot facility first; then Pinpoint and mark!

- Perform a 360-Degree sweep of the area to identify the target facility and to determine the presence of other facilities.
- Use appropriate procedures for verifying the identity of the target facility.
- Use the correct point color for marking facilities.
- Place arrows appropriately on final marks.
- Never use flag only, and always use flags in high traffic areas.
- Mark the target facility, including branch connections, on the first pass (when tracing) with dots.
- Mark the target facility on the final pass (when pinpointing) with dashed lines that are 12-18 inches long and 6-9 feet apart.
- Extend marks beyond the job site by at least 25 feet.
- If flags are required, insert flags about every third mark.
- Mark only where necessary and treat homeowners' property with respect.

Step 8: Verify the accuracy of pinpointing marks!

- Use "symmetrical decay" or "peak and null response" procedure for confirming pinpointing accuracy.
- Do not provide depth measurement readings to excavators unless required by law.
- Use appropriate procedures and precautions when taking depth measurements.
- Verify measurements according to prints.

Step 9: Restore the job site to its original condition!

- Rebond all facilities that were unbonded.
- Remove the ground stake/rod from the soil.
- Pick up all your lines.
- If you accidentally painted private property, notify the homeowner and your supervisor.
- Close all crossboxes, pedestals, and enclosures that were opened.
- Pick up all materials and tools used at the job site (e.g., point vans, extra flags, safety cones)

Step 10: Complete the ticket appropriately and communicate as needed!

- Check prints and records to verify the completeness and accuracy of the completed locate.
- If necessary, draw a sketch and provide all required information on the sketch.
- Follow local high profile procedures when required (e.g., utility appropriate utility companies of high profile conflicts, document notification on ticket).
- On the ticket, document work performed, including problems encountered, special circumstances, and actions taken to address issues.

Signature

Date

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PECO IT Solutions Damage Prevention Screens

12. Search for HP Cases

13. Search Results



**DAMAGE PREVENTION
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Member Code (s) : KC
 Beginning Date : 11/1/2011
 Ending Date : 11/2/2011
 Inspection : All

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Row #	Date Received	Ticket Number	Member Code	Criteria List	Address	Quad	Company	City	Completed?	Locator	Remarks
1	11/1/2011	20112972399	KC	Print Problem	MAJOR CIRCLE		BRUBACHER EXCAVATING	LOWER SALFORD TWP		<input type="button" value="View"/>	<input type="button" value="Modify"/>
2	11/1/2011	20113000084	KC	Long Job, Problem Locate, Print Problem, High Profile Customer	MARLEY ST		SIGNAL SERVICE INC	HORRITOWN BCRO		<input type="button" value="View"/>	<input type="button" value="Modify"/>
3	11/1/2011	20113010286	KC	High Profile Contractor	1225 MEETINGHOUSE RD		MELCAR	LOWER GWYDDED TWP		<input type="button" value="View"/>	<input type="button" value="Modify"/>
4	11/1/2011	20113011068	KC	Transmission Lines, Regulator/Gate Station	807 PAXSON AVE		POCONO TEST BORINGS & DRILLING	CHELTHAM TWP		<input type="button" value="View"/>	<input type="button" value="Modify"/>
5	11/1/2011	20113012252	KC	Transmission Lines, Regulator/Gate Station	STATION AVE		RIGGS DISTLER	ABINGTON TWP		<input type="button" value="View"/>	<input type="button" value="Modify"/>
6	11/1/2011	20113012253	KC	Regulator/Gate Station	COUNTY LINE RD		RIGGS DISTLER	MONTGOMERY TWP		<input type="button" value="View"/>	<input type="button" value="Modify"/>
7	11/1/2011	20113050015	KC	High Profile Customer	1020 VALLEY FORGE RD		NORTH PENN WTR AUTH	TOWAMENCIN TWP		<input type="button" value="View"/>	<input type="button" value="Modify"/>
8	11/1/2011	20113050018	KC	High Profile Customer	1020 VALLEY FORGE RD		NORTH PENN WTR AUTH	UPPER GWYDDED TWP		<input type="button" value="View"/>	<input type="button" value="Modify"/>
9	11/1/2011	20113050017	KC	High Profile Contractor	739 W DEKALB PIKE		RAGE PLUMBING & HEATING	UPPER MERICH TWP		<input type="button" value="View"/>	<input type="button" value="Modify"/>
10	11/1/2011	20113050099	KC	High Profile Contractor, Problem Locate, Print Problem	2400 SWEDE RD		PENNSYLVANIA AMERICAN WATER	EAST HORRITON TWP		<input type="button" value="View"/>	<input type="button" value="Modify"/>

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14. Ticket Details

 DAMAGE PREVENTION
HIGH PROFILE CASES

HRA 00095 POCB 11/01/11 06:57:19 2011050017-000 NEW XCAV EMER

-----PENNSYLVANIA UNDERGROUND UTILITY LINE PROTECTION REQUEST-----

Serial Number--[2011050017]-[000] Channels--[081020;0817]

Message Type--[NEW] [EXCAVATION] [EMERGENCY]

County--[MONTGOMERY] Municipality--[UPPER MERION TWP]
 Work Site--[730 W DEKALB PIKE]
 Nearest Intersection--[S GULPH RD]
 Second Intersection--[N GULPH RD]
 Subdivision--[] Site Marked in White--[N]
 Location Information--
 [WORKING AT CHILIS RESTAURANT IN KING OF PRUSSIA, PA. LOCATION IS AT CORNER
 OF W DEKALB PIKE AND N AND S GULPH RDS.]
 Caller Lat/Long--[]
 Mapped Type--[D] Mapped Lat/Long--
 [40.083409/-75.391759,40.082832/-75.393311,40.085215/-75.386703,
 40.086740/-75.387913,40.085593/-75.390665]
 Map Graphic--[http://www.palcall.org/ViewMap/view.aspx?an=2011050017]

Type of Work--[INSTALL WATER SERV] Depth--[18FT]
 Extent of Excavation--[2FT X 100FT] Method of Excavation--[DIGGING]
 Street--[X] Sidewalk--[X] Pub Prop--[X] Pvt Prop--[X] Other--[]

Legal Start Dates--[] Through []
 Scheduled Excavation Date--[01-Nov-11] Dig Time--[0545] Duration--[3 DAYS]
 Response Due Date--[01-Nov-11]

Caller--[JOE McDONOUGH] Phone--[610-284-2000] Ext--[]
 Excavator--[RADE PLUMBING & HEATING] Homeowner/Business--[D]
 Address--[101 WAVERLY AVE STE C]
 City--[MORTON] State--[PA] Zip--[19070]
 FAX--[610-388-0988] Email--[none]
 Work Being Done For--[ACQUA]

Person to Contact--[JOE McDONOUGH] Phone--[610-476-3374] Ext--[]
 Best Time to Call--[ANYTIME]

Prepared--[01-Nov-11] at [0637] by [DEBORAH CORNELLY]

Remarks--
 []

CS D CS -COMCAST CABLE N DI O DI -U MERION TWP DIIC DIJ-U MERION TWA
 XI O EI -AT&T LOCAL SVCS HRA) HRA-COMCAST-FIBER NS O NS -ACQUA PA
 HT40 HT4-AQUA PA INC AMR MC O XC -PECO PLNG SP O SP -SUNOCO PIPELINE
 SUNO STA-SUNOCO PL YI O YI -VERIZON ERST I

Serial Number--[2011050017]-[000]

----- Copyright (c) 2011 by Pennsylvania One Call System, Inc. -----

Ticket Number: 2011050017

Client Firm: MC
 Status: Marked
 When Statused: 11/1/2011 8:43:01 AM
 High Profile: True
 Closed: True
 Assigned To: T&D, Liried Goode

--- Note entered 11/1/2011 8:43:22 AM ---
 ring clamp to pole atop to mark private line to trans 1 meter. ring clamp to stv wire to mark line to
 bldg. see main & 07; on opposite side of bldg. 3102456

--- Note entered 11/1/2011 8:43:23 AM ---
 HPR-3 KC

Generated: 11/1/2011 10:06:36 AM


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15. Modify – Job Brief (empty sample)



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Vendor	Date Received	Ticket Number	Member Code	Criteria List	Previous Work
STS	11/1/2011	20113050017	KC	High Profile Contractor	Previous Work
Company			Address		
RARE PLUMBING & HEATING			739 W DENALB PIKE		
Job Brief / Hazard Recognition / Assessment			Immediately report injuries / incidents to supervision.		
<p>1 Is all appropriate PPE in place? <input type="checkbox"/> Comments: <input style="width: 90%;" type="text"/></p> <p> <input type="checkbox"/> Approved Safety Shoes <input type="checkbox"/> Hard Hat <input type="checkbox"/> Safety Glasses <input type="checkbox"/> FR Vest </p>					
<p>2 Critical steps verified? <input type="checkbox"/> Comments: <input style="width: 90%;" type="text"/></p>					
<p>3 Error Likely Situations: <input style="width: 90%;" type="text"/></p> <p> <input type="checkbox"/> Slip / Trips / Fall Hazard <input type="checkbox"/> Weather <input type="checkbox"/> Dogs / Wild Life <input type="checkbox"/> Line of Fire <input type="checkbox"/> Traffic <input type="checkbox"/> Construction Area <input type="checkbox"/> Fatigue <input type="checkbox"/> Distractions </p>					
<p>4 Worst Thing that could Happen: <input style="width: 90%;" type="text"/></p> <p> <input type="checkbox"/> Electrical Shock <input type="checkbox"/> Fire / Explosion <input type="checkbox"/> Accident <input type="checkbox"/> Fall <input type="checkbox"/> Injury </p>					
<p>5 Defenses in Place: <input style="width: 90%;" type="text"/></p> <p> <input type="checkbox"/> Three part communication <input type="checkbox"/> Proper PPE <input type="checkbox"/> S.T.A.R. <input type="checkbox"/> Attention to detail <input type="checkbox"/> Eyes on path </p>					
<p>A Awareness Zone: <input style="width: 90%;" type="text"/></p>					
<p>C Caution Zone: <input style="width: 90%;" type="text"/></p>					
<p>T Task Zone: <input style="width: 90%;" type="text"/></p>					
<input type="button" value="Continue"/>			<input type="button" value="Skip Job Brief"/>		


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16. Modify – Job Brief (populated sample)



**DAMAGE PREVENTION
HIGH PROFILE CASES**

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Vendor	Date Received	Ticket Number	Member Code	Criteria List	
STS	11/1/2011	20113059017	KC	High Profile Contractor	Previous Work
Company:			Address:		
RABE PLUMBING & HEATING			739 WOEKALB PIKE		
Job Brief / Hazard Recognition Assessment:				(Immediately report injuries/incidents to supervision)	
<p>1 Is all appropriate PPE in place? <input checked="" type="checkbox"/> Comments: _____</p> <p> <input checked="" type="checkbox"/> Approved Safety Shoes <input checked="" type="checkbox"/> Hard Hat <input checked="" type="checkbox"/> Safety Glasses <input type="checkbox"/> FR Vest </p>					
<p>2 Critical steps verified? <input checked="" type="checkbox"/> Comments: _____</p>					
<p>3 Error Liable Situations: _____</p> <p> <input type="checkbox"/> Slip / Trips / Fall Hazard <input checked="" type="checkbox"/> Weather <input type="checkbox"/> Dogs / Wild Life <input type="checkbox"/> Line of Fire <input checked="" type="checkbox"/> Traffic <input type="checkbox"/> Construction Area <input type="checkbox"/> Fatigue <input type="checkbox"/> Distractions </p>					
<p>4 Worst Thing that could Happen: _____</p> <p> <input type="checkbox"/> Electrical Shock <input type="checkbox"/> Fire / Explosion <input checked="" type="checkbox"/> Accident <input checked="" type="checkbox"/> Fall <input checked="" type="checkbox"/> Injury </p>					
<p>5 Defenses in Place: _____</p> <p> <input type="checkbox"/> Three part communication <input checked="" type="checkbox"/> Proper PPE <input type="checkbox"/> S.T.A.R. <input checked="" type="checkbox"/> Attention to Detail <input checked="" type="checkbox"/> Eyes on path </p>					
<p>A Awareness Zone: _____</p>					
<p>C Caution Zone: _____</p>					
<p>T Task Zone: _____</p>					



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17. HP Case Detail Entry- (empty sample)



**DAMAGE PREVENTION
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Vendor	Date Received	Ticket Number	Member Code	Criteria List	Print Number
STS	11/12/2011	201130-0017	KC	High Profile Contractor	
Company			Address		
RABE PLUMBING & HEATING			739 W DEKALB PIKE		
Contractor Name	Contractor Phone Number	Contractor City		Type Of Work	
JOE MCDONOUGH	610-784-2060	UPPER MERION TWP		INSTL WATER SERV	
Locator Remarks					
Gas/Transmission Line	Contractor excavating within the Row			Witnessed Excavation	
<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>	
DPI Name	Audit Date	Arrival Time	Completion Time		
choose one v	11/2/2011				
<small>For instructions on how to select multiple items in these lists, click here.</small>					
Forms Completed		Information Left With Contract		Status Of Marks	
DDIF Incident Report PILR FC Report Condition Report		PA 1 Law Dig Safe Pocket Guide Mark Out Card Routine Notification Brochure Business Card		Marks OK Marks Off NO Marks Marks Compromised Partial Marks Marks Not Checked	
Inspection Complete					
<input type="checkbox"/>	Job Site Visited by Inspector				
<input type="checkbox"/>	Preconstruction Meeting				
<input type="checkbox"/>	Service Provided by Inspector				
DPI Actions Taken Be specific about... Location - What was verified - Actions performed - Any comments.					
<input type="button" value="Save Changes"/>					



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18. HP Case Detail – (populated sample)

**DAMAGE PREVENTION
HIGH PROFILE CASES**

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Vendor	Date Received	Ticket Number	Member Code	Criteria List	Print Number
ETS	11/7/2011	20113050017	KC	High Profile Contractor	
Company			Address		
RABE PLUMBING & HEATING			739 W DEKALB PIKE		
Contractor Name		Contractor Phone Number		Contractor City	
JOE McDONOUGH		610-284-2060		UPPER MERION TWP	
Type Of Work					
INSTL WATER SERV					
Locator Remarks					
Gas Transmission Line		Contractor excavating within the Row		Witnessed Excavation	
<input type="checkbox"/>		<input type="checkbox"/>		<input checked="" type="checkbox"/>	
DPI Name		Audit Date		Arrival Time	
choose one		11/2/2011			
<small>For instructions on how to select multiple items in these lists, click here.</small>					
Forms Completed		Information Left With Contractor		Status Of Marks	
DDIF Incident Report PILR FC Report Condition Report		PA 1 Lew Dig Safe Pocket Guide Mark Out Card Routine Notification Brochure Business Card		Marks OK Marks Off NO Marks Marks Compromised Partial Marks Marks Not Checked	
Inspection Complete					
<input checked="" type="checkbox"/> Job Site Visited by Inspector		two way street			
<input type="checkbox"/> Preconstruction Meeting					
<input type="checkbox"/> Service Provided by Inspector					
DPI Actions Taken Be specific about Location - What was verified - Actions performed - Any comments. History... (0)					
some marks were off and some were missing. completed and corrected all marks.					


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19. Search Results – (after detail saved)



**DAMAGE PREVENTION
HIGH PROFILE CASES**

[Home](#) [Reports](#)

Member Code(s) : KC
 Beginning Date : 11/1/2011
 Ending Date : 11/2/2011
 Inspection : All

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Row #	Date Received	Ticket Number	Member Code	Criteria List	Address	Quad	Company	City	Completed?	Locator Remarks	
1	11/1/2011	20112972399	KC	Print Problem	MANOR CIRCLE		BRUBACHER EXCAVATING	LOWER SALFORD TWP			View Modify
2	11/1/2011	20113000084	KC	Long Job, Problem Locate, Print Problem, High Profile Customer	MARKLEY ST		SIGNAL SERVICE INC	MORRISTOWN BORO			View Modify
3	11/1/2011	20113010289	KC	High Profile Contractor	1225 MEETINGHOUSE RD		MELCAR	LOWER GWYNEDD TWP			View Modify
4	11/1/2011	20113011999	KC	Transmission Lines, Regulator/Gate Station	607 PAXSON AVE		POCONO TEST BORINGS & DRILLING	CHELLENHALL TWP			View Modify
5	11/1/2011	20113012252	KC	Transmission Lines, Regulator/Gate Station	STATION AVE		RIGGS DISTLER	ABINGTON TWP			View Modify
6	11/1/2011	20113012253	KC	Regulator/Gate Station	COURTY LINE RD		RIGGS DISTLER	MONTGOMERY TWP			View Modify
7	11/1/2011	20113050015	KC	High Profile Customer	1020 VALLEY FORGE RD		NORTH PENN WTR AUTH	TOWANENCIN TWP			View Modify
8	11/1/2011	20113050019	KC	High Profile Customer	1020 VALLEY FORGE RD		NORTH PENN WTR AUTH	UPPER GWYNEDD TWP			View Modify
9	11/1/2011	20113050017	KC	High Profile Contractor	739 W DEKALB PIKE		RABE PLUMBING & HEATING	UPPER MERION TWP	✓		View Modify
10	11/1/2011	20113050099	KC	High Profile Contractor, Problem Locate, Print Problem	2400 SWEDE RD		PENNSYLVANIA AMERICAN WATER	EAST MORRITON TWP			View Modify

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20. Subsequent Modify Attempt on Same Day



**DAMAGE PREVENTION
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[Home](#) [Records](#)

Vendor	Date Received	Ticket Number	Member Code	Criteria List	
STS	11/1/2011	20113050017	KC	High Profile Contractor	Previous Work
Company			Address		
RABE PLUMBING & HEATING			738 W DEKALB PIKE		
Job Brief / Hazard Recognition Assessment			Immediately report injuries/incidents to supervision		

Select Option

This case already has a Job Brief for today.

- Create new Job Brief to start a new inspection.
- Existing Job Brief still applies. Make changes to earlier inspection.


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21. Add New HP Case



**DAMAGE PREVENTION
HIGH PROFILE CASES**

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Vendor	Date Received	Ticket Number	Member Code	Criteria List	Print Number
STS	11/2/2011	<input type="text"/>	choose one ▾	<ul style="list-style-type: none"> Other/Unknown Cast Iron Long Job Transmission Lines Blasting High Profile Contractor Heavy Underground Regulator/Gate Station Problem Locate Print Problem Directional Boring/Drilling Road Widening High Profile Customer <p style="font-size: small; margin-top: 5px;">For instructions on how to select multiple items in this list click here.</p>	<input type="text"/>
Company			Address		
<input type="text"/>			<input type="text"/>		
Contractor Name		Contractor Phone Number		Contractor City	
<input type="text"/>		<input type="text"/>		<input type="text"/>	
Contractor Name		Contractor Phone Number		Type Of Work	
<input type="text"/>		<input type="text"/>		<input type="text"/>	

EXHIBIT B

RECEIVED

JAN 8 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU



An Exelon Company

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RECEIVED

JAN 8 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Effective: 3/14/2014
Supersedes: GO-PE-903
Level: 3
Review Type: 1 Year
Core Function: Operate & Restore

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1. Purpose

- 1.1. This procedure is written to comply with Pennsylvania Act 187 and the Code of Federal Regulations 49CFR 192.614.
- 1.2. A portion of Gas Operations Damage Prevention Program is fulfilled by participation in the Pennsylvania One-Call System (POCS). The System allows communication between designers, contractors, and excavators to notify all member utilities in the system (including PECO Energy or its authorized locating agent) by placing only one phone call. More information on POCS is available in Attachment GO-PE-9003-1.

2. Precautions and limitations

- 2.1. Precautions
 - 2.1.1 None.

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2.2. Limitations

- 2.2.1 IF a contractor is not responsive to or is in violation of the Pennsylvania Underground Utility Line Protection Law (PA Act 287 of 1974 as amended by Act 187 of 1996, 73P.S. & 176 et.seq.), THEN the Claims and Security Division and/or local police authorities shall be contacted to initiate injunctive action against the contractor to protect PECO Energy facilities.
- 2.2.2 The information set forth in this procedure represents the minimum requirements for the protection of PECO Energy facilities. Field conditions may require additional restrictions.

3. Prerequisites

- 3.1. None

4. Procedure

4.1. PECO Energy Use of POCS

- 4.1.1 PECO Energy will make the proper notifications to POCS in accordance with the Underground Utility Line Protection Law, PA Act 287 of 1974 for:

- 4.1.1.1 Design work
- 4.1.1.2 Demolition work
- 4.1.1.3 Routine/Planned excavation work
- 4.1.1.4 Emergent excavation work

4.2. Prior to Excavation Activities

- 4.2.1 Damage Prevention and/or authorized locating agent, will **CONDUCT**, where appropriate, a pre-excavation meeting with the excavator to discuss all aspects of the planned excavation activities.

- 4.2.1.1 The following excavation activities require pre-construction study and planning due to the possible impact on facilities and their surrounding supporting soil and are prime candidates for re-inspection by company personnel:

- 4.2.1.1.1 Blasting
- 4.2.1.1.2 Boring
- 4.2.1.1.3 Tunneling
- 4.2.1.1.4 Backfilling in proximity to PECO facilities
- 4.2.1.1.5 Removal of above ground structure by explosive or mechanical means

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4.2.1.1.6 Moving operations (e.g., large excavations, foundation work, underground tank removal, grading, etc.)

4.3. During Excavation Activities

4.3.1 Exelon crews and COC's will excavate in accordance with the Exelon Rules to Dig By work practice (see Attachment GO-PE-9003-6)

4.4. After Excavation Activities

4.4.1 **PERFORM** a leakage survey, in accordance with leak survey procedures, over any gas facilities that had the potential of being affected during excavation activities.

4.4.2 **PERFORM** surveillance for settlement of backfilled excavations and related secondary construction work, such as sewer lateral connections.

4.4.3 **IF** damage to protective coatings or cathodic protection facilities is suspected, **THEN NOTIFY** the Corrosion Control Division in order that tests may be conducted promptly to verify coating integrity and continuity of anode protection systems.

4.4.4 **IF** it is suspected excavator has violated PA Act 187; **THEN NOTIFY** PA Dept. of Labor and Industry via Utility Line Protection Act Incident Report

5. Roles and responsibilities

5.1. PECO's Construction & Maintenance Damage Prevention organization provides the following services:

5.1.1 Damage Prevention Inspectors who provide for the safety of the general public and PECO's Facilities in areas where excavation activity is ongoing.

5.1.2 Proactive education of excavators and the general public about PA One Call Law, CFR title 49 parts 192.614 & 192.755, and PECO Energy Underground Construction Standards.

5.1.3 Maintaining, tracking, and analyzing damage data to identify trends and recommend solutions to proactively reduce damages due to excavation work on the PECO system.

5.2. POCS provides the following services:

5.2.1 Listing and maintaining on a current basis, organizations and persons that might engage in excavation activities in the service area.

5.2.2 Education of the public of the existence and purpose of damage prevention procedures.

5.2.3 Yearly notification, by direct mailing, of organizations and persons identified as being involved in excavation activities.

5.2.4 Explaining how to learn the location of underground pipelines.

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- 5.2.5 Maintaining a record of all incoming and outgoing requests to or from parties involved in excavating activity or being notified of an excavation.
- 5.3. Damage Prevention - PECO
 - 5.3.1 Manager, Damage Prevention
 - 5.3.1.1 Provides oversight and direction to the Damage Prevention function
 - 5.3.1.2 Oversees the day-to-day activities of the locating vendor
 - 5.3.1.3 Manages and Maintains external industry and association relationships
 - 5.3.1.4 Participates as an active member of the PA 1 Call Board of Directors
 - 1. Attend PA1 Board Meeting 4 times per year
 - 5.3.1.5 Participates in Outreach Programs
 - 5.3.1.5.1 Philadelphia Water Department
 - 5.3.1.5.2 American Water
 - 5.3.1.5.3 USIC Locators
 - 5.3.1.5.4 Verizon FTTP/FIOS
 - 5.3.1.5.5 5. Bucks County Municipal Forum
 - 5.3.1.5.6 Montgomery County Municipal Forum
 - 5.3.1.5.7 Chester County Municipal Forum
 - 5.3.1.5.8 PECO COC Damage Prevention Reviews
 - 5.3.1.5.9 Shainline
 - 5.3.1.5.10 Delmont
 - 5.3.1.5.11 Caddick
 - 5.3.1.5.12 Brubacher
 - 5.3.1.5.13 Bulldog
 - 5.3.1.5.14 PA One Call Cross Bore Task Force
- 5.4. Analyst, Damage Prevention
 - 5.4.1 Maintains a database to track all damage data caused by excavation work
 - 5.4.2 Produces monthly reports to identify trends and recommend programmatic changes to reduce damages
 - 5.4.3 Liaison between PA 1 Call, external contractors and locating vendor for emergent issues
 - 5.4.4 High Profile Contractor list
- 5.5. Supervisor, Damage Prevention

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5.5.1 Provides direct supervision and direction to Damage Prevention Inspectors

5.5.2 Interacts with locating vendor and external contractors

5.5.3 Provides education and assistance to field employees as needed

5.6. Damage Prevention Inspector

5.6.1 Resolves, or refers to other PECO groups, customer concerns that arise in the field when working around PECO facilities.

5.6.2 Audits and documents PECO Energy locating agent's proper identification of underground facilities of High Profile jobs.

5.6.3 The Damage Prevention Inspectors will consider the following factors in determining the need for and extent of audits/inspections:

5.6.3.1 The type and duration of the excavation activity involved

5.6.3.2 The proximity to the operator's facilities

5.6.3.3 The type of excavating equipment involved

5.6.3.4 The criticality of the operator's facilities

5.6.3.5 The type of area in which the excavation activity is being performed

5.6.3.6 The potential for a serious incident should damage occur

5.6.3.7 The past experience of the excavator

5.6.3.8 The potential for damage occurring that may **not** be easily recognized by the excavator, such as improper support during excavation and backfill

5.6.3.9 The potential for facility markings to become obscured

5.6.4 Inspections will include but are not limited to the following actions:

5.6.4.1 **LOCATE AND CHECK** distribution valves and other means of emergency shutdown in the event they are necessary for control.

5.6.4.2 **CONFIRM** excavator has valid POCS request

5.6.4.3 **REVIEW** POCS request work scope and **ENSURE** excavator and locator have same understanding of extent of job site

5.6.4.4 **IDENTIFY** type and/or size of PECO facilities in conflict, **DETERMINE** schedule of when those facilities will be exposed and/or crossed

5.6.4.5 **ENSURE** excavator has knowledge of proper clearances and backfill techniques for respective facility type.

5.6.4.6 Completion of all required fields on the electronic inspection report

5.6.4.7 **DOCUMENT** all site meetings before or during excavation via electronic inspection report

5.6.4.8 **REVIEW** of locator mark accuracy

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- 5.6.5 Lending assistance and training to contract locators as necessary to identify PECO facilities.
- 5.7. Construction Designers
 - 5.7.1 Shall **at least** ten (10) working days in advance, but not more than ninety (90) working days in advance of the final design CALL POCS **AND GIVE** the call taker the required information in accordance with the law
 - 5.7.1.1 **RECORD** the following:
 - 5.7.1.1.1 Serial number identifying the request for information
 - 5.7.1.1.2 POCS *phone number*
 - 5.7.1.1.3 **SHOW** on job sketch all PECO & foreign (if known) underground facilities in the work area
 - 5.7.1.1.4 **LIST** (*adjacent to the title block*) companies to be contacted prior to construction (names, phone number, and notification serial number)
- 5.8. Gas Field Personnel
 - 5.8.1 **CALL** POCS [**not** less than three (3) **nor** more than ten (10) working days prior to start] for routine/planned excavation work
 - 5.8.2 **CALL** POCS immediately for emergent excavation work
 - 5.8.3 **ENSURE** all facility owners have responded to the POCS request prior to beginning excavation
 - 5.8.4 **EXCAVATE** in accordance with the Exelon "Rules to Dig By"
 - 5.8.5 **MAINTAIN** all markings of facility locations in the work area during construction to ensure awareness of utility locations.
- 5.9. Exelon Authorized Locating Personnel
 - 5.9.1 Routine, Demolition, and Emergent Excavation Notifications
 - 5.9.1.1 Receive and respond to all POCS requests within the prescribed legal timeframes.
 - 5.9.1.1.1 **IDENTIFY** (*mark, stake, locate, or otherwise provide position of*) PECO underground gas, electric, water and fiber lines within the scope of the work site.
 - 5.9.1.1.1.1 In such cases where identification cannot be performed within the legal timeframe **NOTIFY** the contractor via POCS, KARL (Kathy Automated Response to Locate System) conflict may exist and attempt to make direct contact, if an extension is granted from contractor **DOCUMENT** such.

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- 5.9.1.1.2 IDENTIFY position of underground lines at the site within 18 inches horizontally from outside wall in such a manner to enable the contractor to employ prudent techniques (e.g., hand dug test holes) to determine the precise position of underground lines.
- 5.9.1.1.3 PERFORM the above identification utilizing PECO Energy records, and by use of standard locating techniques PECO Energy may PERFORM excavation around its facilities in fulfillment of its locating responsibilities.
- 5.9.1.1.4 FOLLOW designated color codes for utilities:
 - 5.9.1.1.4.1 High Visibility Safety Yellow - Gas Distribution and Transmission
 - 5.9.1.1.4.2 Safety Red - Electric Power Distribution and Transmission
 - 5.9.1.1.4.3 Safety Red - Cathodic Protection Facilities
 - 5.9.1.1.4.4 Safety Orange – Fiber Optic or other PECO Telecom Facilities
 - 5.9.1.1.4.5 Blue – PECO water lines (feed to Limerick Nuclear Plant)
- 5.9.1.1.5 IDENTIFY the size of the facilities if over 2".
 - 5.9.1.1.5.1 Do not give facility depth.
- 5.9.1.2 Fax a copy of all Demolition POCS requests to the appropriate PECO Contractor and Builder Services organization
- 5.9.1.3 DOCUMENT results of locate by completing all required documentation on the electronic close screen within the ticket management system with positive response to the POCS KARL system
- 5.9.1.4 Identify High Profile jobs to PECO Damage Prevention Inspectors in accordance with the High Profile work process (see Attachment GO-PE-9003-5, Page 4 of 4) which include:
 - 5.9.1.4.1 Cast iron gas mains
 - 5.9.1.4.2 Gas transmission pipelines
 - 5.9.1.4.3 Large gas distribution mains
 - 5.9.1.4.4 Gas gate station and regulator stations
 - 5.9.1.4.5 Directional boring/drilling work
 - 5.9.1.4.6 Long jobs
 - 5.9.1.4.7 Blasting
 - 5.9.1.4.8 Road widening
 - 5.9.1.4.9 High profile contractor
 - 5.9.1.4.10 High profile customer

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- 5.9.1.4.11 Problem locate jobs
- 5.9.1.4.12 Heavy underground locations
- 5.9.1.4.13 PECO facility record discrepancies
- 5.9.1.5 Maintain an electronic record of the disposition of all POCS requests as specified in the contractual agreement with PECO
- 5.9.1.6 Provide access to the POCS request software to PECO Energy for purposes of viewing the disposition of requests and retrieving tickets of special interest. (Example, requests by a specific contractor, or work proposed in specific areas.)
- 5.10. Design Notifications
 - 5.10.1 Receive and process all POCS Design requests within the prescribed lawful timeframe
 - 5.10.2 Review work scope identified on the Design request with PECO facility records
 - 5.10.3 Send letter in accordance with the Design Ticket work process (see Attachment GO-PE-9003-7) to the designer indicating conflicts/no conflict
 - 5.10.3.1 Enclose copies of PECO Energy underground facility maps with all conflict responses
 - 5.10.4 Maintain a copy of the response to the designer and an electronic record of the disposition of the POCS requests as specified in the contractual agreement with PECO
 - 5.10.5 **DOCUMENT** results of completion of the design request by completing all required documentation on the electronic close screen within the ticket management system with positive response to the POCS KARL system
- 5.11. Letters and Calls Received Outside POCS
 - 5.11.1 Non-emergency
 - 5.11.1.1 IF calls or letters are received directly from designers/excavators that are not related to the direct work of the locating vendor, THEN DIRECT them to call the regular POCS number:
 - 5.11.1.1.1 Calls made from within Pennsylvania - 1-800-242-1776
 - 5.11.1.1.2 Calls from outside of Pennsylvania - 1-800-248-1786
 - 5.11.2 Emergency
 - 5.11.2.1 IF a call is received reporting damage or imminent damage to PECO Energy facilities, THEN REFER the caller to the PECO Energy emergency number (1-800-841-4141, option #1) and PA 1 Call at 1-800-242-1776.

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6. Documentation

- 6.1. None

7. Terms and definitions

7.1. Facility Owner:

- 7.1.1 Public utility, political subdivision, municipality, authority, rural electric cooperative or its named representative trade association, or other person or entity who or which owns or operates an underground line.

7.2. Excavation Work:

- 7.2.1 The use of powered equipment or explosives in the movement of earth, rock or other material, and includes but is not limited to anchoring, augering, backfilling, blasting, boring, digging, ditching, drilling, driving-in, grading, plowing-in, ripping, scraping, trenching and tunneling.

7.3. Demolition Work:

- 7.3.1 The partial or complete destruction of a structure, by any means, served by, or adjacent to a line or lines.

7.4. PECO Energy Emergency Number:

- 7.4.1 1-800-841-4141, Option #1

7.5. POCS:

7.5.1 Pennsylvania One Call System

7.5.2 POCS Telephone Numbers:

- 7.5.2.1 ALL Areas: 811
7.5.2.2 From within Pennsylvania: 1-800-242-1776
7.5.2.3 From outside Pennsylvania: 1-800-248-1786

8. References

- 8.1. Supersedes GO-PE-903 GASDAMAGE PREVENTION
- 8.2. Supersedes Gas Instruction Letter, Mains and Services, Mains, General 1-7, Damage Prevention Program
- 8.3. Supersedes Gas Distribution Foreman's Manual III-A-4, Damage Prevention Program
- 8.4. Code of Federal Regulations 25CFR 211.62
- 8.5. Code of Federal Regulations 29CFR 1926.651

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- 8.6. Code of Federal Regulations 29CFR 1926.850
- 8.7. Code of Federal Regulations 29CFR 1926.900
- 8.8. Code of Federal Regulations 49CFR 192.614
- 8.9. DS-X-107, Pennsylvania One-Call System (POCS)
- 8.10. Procedure GO-PE-3009-Repair and Replacement of Gas Mains and Services
- 8.11. Procedure GO-PE-1004-Gas Leakage Surveys
- 8.12. Procedure OP-G-515, Procedure for Handling and Recording Outside Leaks
- 8.13. Pennsylvania Act 187

9. Attachments

- 9.1. GO-PE-9003-1, Pennsylvania One Call System Information
- 9.2. GO-PE-9003-2, 29CFR 1926, Subpart P Excavations, Trenching And Shoring
- 9.3. GO-PE-9003-3, Title 25 - Rules And Regulations, Chapter 211 - Storage, Handling And Use Of Explosives; Section 211.62 - Blasting in the vicinity of utility lines
- 9.4. GO-PE-9003-5, High Profile Process
- 9.5. GO-PE-9003-6, Rules to Dig By
- 9.6. GO-PE-9003-7, Design Ticket Process
- 9.7. GO-PE-9003-9, Screen Captures

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10. Development history

Revision 0		Date: 10/26/2004
Writer	Kathy Lloyd (Damage Prevention), William Nuss (Gas Engineering)	
Reviewer(s)	John Frantz (Gas Engineering);	
Technical Approver(s)	John Frantz (Manager, Gas Engineering), Marie Furey (Manager, Damage Prevention);	
Safety Approver(s)	Approver's name and work group;	
UFAM Approver(s)	UFAM Name, core function and title	
Reason written	Rewrote procedure to focus on natural gas damage prevention. Updated organizational names and re-formatted in accordance with the Exelon management Model. THIS PROCEDURE REPLACES OP-X-505.	

Revision 0		Date: 5/12/2008
Writer	Gary Bartnik (Damage Prevention)	
Reviewer(s)	Gas Engineering	
Technical Approver(s)	Approver's name and work group;	
Safety Approver (s)	Approver's name and work group;	
UFAM Approver(s)	Diane DiMarco	
Reason written	Updated Manager responsibilities. Replaces GO-PE-903	

Revision 1		Date: 11/7/2011
Writer	Maureen Ludwick (Damage Prevention)	
Reviewer(s)	Rob Bedics (Damage Prevention)	
Technical Approver(s)	Approver's name and work group;	
Safety Approver(s)	Approver's name and work group;	
UFAM Approver(s)	Steve Singh (Gas Asset & Perf.)	
Reason written	To provide instructions to prevent excavation or demolition work from damaging PECO underground pipelines.	

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Revision 2		Date: 04/08/2013
Writer	Maureen Ludwick.	
Reviewer(s)	Rob Bedics, Dave Haverstick, Joe Beerley	
Technical Approver(s)	Approver's name and work group;	
Safety Approver(s)	Approver's name and work group;	
UFAM Approver(s)		
Reason written	Periodic review	

Revision 3		Date: 03/10/2014
Writer	Maureen Ludwick (Damage Prevention Analyst)	
Reviewer(s)	Rob Bedics (Damage Prevention), Dave Haverstick (Damage Prevention), Brian Camfield (Gas Asset Management & Performance), David Bonner (Gas Asset Management & Performance)	
Technical Approver(s)	Approver's name and work group;	
UFAM Approver(s)	Nicole LeVine (Director Regional Operations Gas Distribution)	
Reason written	Updated locating vendor to USIC, Inc. throughout procedure and attachments, added PA One Call Cross Bore Task Force to outreach programs for Manager of Damage Prevention and editorial changes.	

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PENNSYLVANIA ONE-CALL SYSTEM INFORMATION

When a designer or contractor contacts POCS, the operator gives the caller a serial number and inputs the information received from the caller into a computer. The computer transmits this information to each member who has underground facilities in the political subdivision where the excavation is to take place.

Printers have "answer back" feature that enables the computer to determine if each receiver for which a message is intended is operative at the beginning and end of each message. If a receiver is inoperative at either time, then the message is repeated after a short interval. If the receiver still does not respond, an operator will telephone the message and notify the receiving location that its printer is inoperative.

When POCS receives an emergency call reporting damage or imminent damage to a member's underground facilities, the caller is given a notification serial number and told to call the affected company directly at the supplied emergency phone number. The computer also electronically sends a confirming message to all members who have underground facilities in the political subdivision.

POCS has been given the hours that the receiver is manned including a list of holidays PECO Energy observes. Any calls received at night, on weekends, or on a holiday that requires action before the printer is scheduled to be manned will be phoned to the PECO Energy authorized locating agent's answering service. The proper emergency telephone number and a confirming order will electronically be sent to the printer.

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29CFR 1926, SUBPART P EXCAVATIONS, TRENCHING AND SHORING

The estimated location of utility installations, such as sewer, telephone, fuel, electric, water lines, or any other underground installation that reasonably may be expected to be encountered during excavation work, shall be determined prior to opening an excavation.

Utility companies or owners shall be contacted within established or customary local response times, advised of the proposed work, and asked to establish the location of the utility underground installations prior to the start of actual excavation. When utility companies or owners cannot respond to a request to locate underground installations within 24 hours (unless a longer period is required by state or local law), or cannot establish the exact location of these installations, the employer may proceed, provided the employer does so with caution, and provided detection equipment or other acceptable means to locate utility installations are used.

When excavation operations approach the estimated location of underground installations, the exact location of the installations shall be determined by safe and acceptable means.

"Subpart T" - Demolition; Section 1926.850 - Preparatory Operations (c) All electric, gas, water, steam, sewer and other service lines shall be shut off, capped or otherwise controlled, outside the building line before demolition work is started. In each case, any utility company that is involved shall be notified in advance

"Subpart U" - Blasting and the use of explosives; Section 1926.900 - General Provisions (o)

Blasting operations in the proximity of overhead power lines, communication lines, utility services or other services and structures shall not be carried on until the operators and/or owners have been notified and measures for safe control have been taken.

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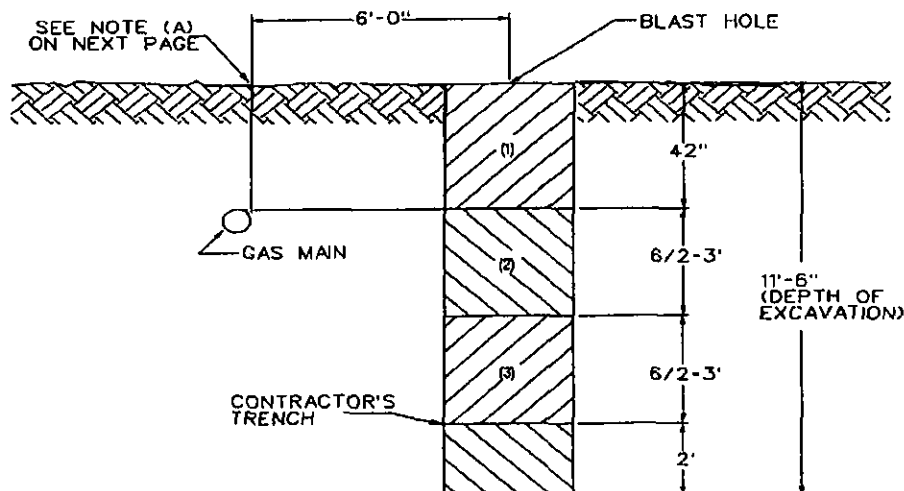
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TITLE 25 - RULES AND REGULATIONS, CHAPTER 211 - STORAGE, HANDLING AND USE OF EXPLOSIVES; SECTION 211.62 - BLASTING IN THE VICINITY OF UTILITY LINES.

These regulations set forth the blasting requirements in the vicinity of utility lines. They require the blaster to inform himself or herself of the location of underground utilities and to use a drilling pattern and blast initiation procedure that will provide the greatest possible relief in a direction away from utility lines. Item (d) of this Section reads as follows:

- (d) All blasting in the vicinity of utility lines shall be conducted as follows:
 - (1) Excavation from the surface to a depth corresponding to the elevation of the top of the buried utility can proceed at the discretion of the blaster using accepted techniques.
 - (2) When the excavation has attained a depth equal to the elevation of the top of the buried utility line or if the line is exposed in and makes solid contact with the surface, the vertical depth of subsequent blast holes will be restricted to one-half the horizontal distance from the closest portion of the pipeline. In this instance, blast hole diameter will be restricted to a maximum of three inches with no more than one hole being initiated per delay period.

An example of the requirements of Item d is shown in the diagram below and explained in the following text.



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- (1) The contractor should drill and blast in four steps, removing material after each step.
- (2) Contractor may remove this trench section down to an elevation equal to the depth of the buried facility (in this case 42 inches). If blasting is used for this section of trench, then the drill hole for the charge may not be greater than 42 inches in depth.
- (3) The vertical depth of the drill hole for a blasting charge in this section is limited to one-half the horizontal distance from the closest portion of the buried facility (in this case, $6 \times \frac{1}{2}$ or 3 feet).
- (4) The removal of this section and every succeeding section will be identical to section 2 with the blast hold depth being limited to one-half the horizontal distance from the closest portion of the buried facility.

NOTE A: Underground facilities shall be marked on the surface prior to construction. The contractor is responsible for determining the exact location of the underground lines, but when mutually agreeable, a distance of 18 inches each side of the marked location may be used as the designated near edge of the line.

A blasting contractor may apply for a change in these requirements if one or more of these regulations provide an operational or safety-oriented hardship. Application must be made to the Department of Environmental Resources for a waiver of the regulation(s) in question. This waiver may be granted if, in the judgment of the Department, the alternative procedure does not endanger the utility line. Any waiver should be made known to the utilities involved.

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HIGH PROFILE PROCESS

PURPOSE

To provide general guidelines to the USIC., Inc. workforce and PECO Dig Safe employees in the function and use of the High Profile Reporting tool located on the USIC., Inc. web page.

TERMS AND DEFINITIONS

High Profile: PECO Energy's numeric designation for PA 1 Call tickets received by USIC., Inc. that may require further action by a PECO Damage Prevention Inspector.

High Profile Reporting Tool – USIC., Inc. web-based PA 1 Call ticket management system (USICINC.COM) Custom Reports/High Profile

High Profile Designation Numbers – See attachment #1

PA 1 Call System, Inc. (PA 1 Call) – non-profit Pennsylvania corporation created to protect the underground facilities of members through communication with any person(s) planning to disturb the earth.

PA 1 Call Ticket – Routine, Dig Up, Emergency, and Design notifications to facility owners of specific excavation information so that the lines can be marked

Dig Up Ticket – PA 1 Call tickets called in for a mark out by excavators who have hit/damaged an underground facility line

Emergency Ticket – PA 1 Call tickets called in by excavators for a mark out who need to dig on a job that involves a clear and immediate danger to life or property

Routine Ticket – PA 1 Call tickets called in by excavators for a mark out under normal conditions not addressed by a Dig Up or Emergency ticket

Demolition Ticket – PA 1 Call tickets called in by excavators for a mark out under normal conditions not addressed by a Dig UP or Emergency ticket where the excavator will demolish the building/facility

Design Stage Ticket – PA 1 Call tickets called in by design firms, engineering firms, and contractors requesting prints of underground facilities during the design phase of a project prior to excavation

Damage Prevention Specialist (DPS) – USIC., Inc. field employee responsible for marking PECO underground facilities and completing PA 1 Call tickets

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Damage Prevention Inspector (DPI) – PECO Energy field employees responsible for proactive damage prevention of PECO underground facilities

USIC., Inc. – PECO Energy's locating vendor responsible for completing PA 1 Call tickets in Bucks, Chester, Delaware, Montgomery and York Counties

RESPONSIBILITIES

USIC., Inc. DPS

Marks out and or clears Dig UP, Emergency, Routine, and Demolition PA 1 Call tickets received as per the scope specified on the PA 1 Call ticket

Identifies High Profile jobs as per Attachment #1 on Emergency, Routine, and Demolition and Dig Up tickets only.

Design tickets do not require a High Profile designation

On the USIC., Inc. ticket management completion screen:

- Clicks on the High Profile option and notes the High Profile designation number(s) in the Film Roll section using the following format standards:
- Enter number only. Do not use # of other symbols (e.g. 1)
- Separate multiple designation numbers with a comma (e.g. 1,5)
- If the high profile designation number(s) is the same for both the electric and gas, only check the High Profile option and enter the number(s) in the Film Roll Field for either the electric or gas completion screen area. Do not enter duplicate information in both completion screens.
- If the gas and electric high profile reasons are different, check the high profile option and enter the appropriate number in the film roll field of each completion screen

Clicks on the appropriate close codes (e.g. Painted, Flagged, Excavation Site Clear)

Enters the PECO print #

Enters any necessary comments in the Driver Remarks

Notifies USIC., Inc. supervisor immediately of any PA 1 Call tickets designated with an 8 (Problem Locate)

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Notifies USIC., Inc. Supervisor immediately of any tickets designated with a 7R (PECO gas regulator station)

USIC., Inc. Supervisor

Reviews the High Profile Report daily to ensure tickets are properly coded

When notified by USIC., Inc. DPS of a 7R, PECO Regulator Station:

- Immediately calls the PECO DOC at (610) 941-1599.
- Documents, in writing, the date, time, and name of PECO employee notified

When notified by USIC. DPS of a Problem Locate (High Profile number 8), assists the DPS in locating the facilities.

Contacts the designated County DPI for assistance when necessary

Notifies the PECO Dig Safe Analyst at (610) 941-1631 with any changes to the High Profile Report

PECO DPI

Reviews the High Profile Report on the USIC., Inc. web site daily for tickets in their assigned county

Prioritizes the work giving high priority to cast iron, problem contractors, and problem locates for follow-up action

Tickets designated 7S (substation) or 7G(gate station):

- Determine if scope of work is inside the perimeter of the station
- Work with PECO T & S personnel to complete the mark out within the perimeter of the PECO sub-station or gate station

Makes field visit/inspections/audits/contact as necessary

Completes a PECO Damage Prevention audit report for every audit conducted

Returns all completed audits and summary to PECO Dig Safe Supervisor weekly

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ATTACHMENT 1

CRITERIA #	CRITERIA	HIGH PROFILE
1	CAST IRON MAIN	In the scope of the job.
2	LONG JOB	Greater than 500 feet.
3	GAS TRANSMISSION	Print shows (--N--PE--N--), (--- NG ---), (--Do Not Tap--)
	GAS LARGE DISTRIBUTION MAINS	Mains equal to and greater than 10 inch.
	ELECTRIC TRANSMISSION	Greater than 34,000 volts.
	WATER TRANSMISSION	Cooling water supply lines. (Bucks & Mont. Co. only)
4	BLASTING	Identified on ticket, and anywhere in the vicinity of the job scope.
5	HIGH PROFILE CONTRACTOR	From the High Profile Contractor List.
6	HEAVY UNDERGROUND	Very congested map.
7	REGULATOR / GATE / SUB-STATION	Anywhere in the vicinity of the job scope.
8	PROBLEM LOCATE	The Locator & Supervisor have exhausted all resources & CNL. Supervisor calls PECO DPI immediately
10	DIRECTIONAL BORING / DRILLING	In the scope of the job.
11	ROAD WIDENING	All tickets called in for road widening projects
12	HIGH PROFILE CUSTOMER	Questionable locates involving schools, hospitals, nursing homes, And other facilities where evacuations can occur

9 is not a criteria.

One of the following must be noted
in locator remarks !

When # 9 is selected, It is notification of :	
9	No Print = No Sketch, No Map, No Record. Nothing!
9	Blank Print = No info on print, record, or map.
9	Insufficient information on print, record, or map.
9	Incorrect information on print, record, or map = DDIF !

Dig Safe 12/10/2002

Attachment GO-PE-9003-5
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Rules To Dig By...

Verify on One Call Ticket

Check Meter Date, Time, Location, Scope and Extent of Work

Locate Gas, Water, Electric, and Permanent Utility Markings

Locate Signs, Work Orders and Plans

Excavate Carefully Transmitters, Cables, Downleads and Shims

Work Carefully Begin with the least time of One-Call ticket for each asset

Call One-Call Operator Call back Uncomplete Marks, or Conflicting Marks

Side 1

Utilize the STAR process **Stop-Think-Act-Review**

Stop Actively control the excavation, location marks of excavations, utility work proposed depth, and location to determine if it is on or off ground utilities

Think Use power of equipment such as trenchers, backhoes, and augers until you have verified utility location

Act Notify facilities when cutting on hot lines

Review Observe Procedures when marks are in question

Remember All One-Call marks, take what you can get

A DIG TICKET IS NOT A LICENSE TO DIG. CALL 800-497-1113

Side 2

○ = .625" x .125" SLOT (1)

Part #:	CE-RULES/DIG-CARD	Size:	3.375" x 2.125" w/ .125" rc	Proof Level:	F
Colors:	Yellow on Red	File:	CE-DIG-RULES-DIG-CARD.F.ai	Date:	11/7/03
Construction:	Provided on Quotation No.: 22735			Scale:	100%

NOTE: This is a proof of your artwork. Please review the text size, style, spelling, and locations for errors. Upon receipt of your approval, your order will be printed according to this proof. Your order cannot be processed further until approval is received. No credit will be given for product which conforms to this proof.

APPROVED AS IS APPROVED WITH CORRECTIONS CORRECTED PROOF REQUESTED



(847) 918-3700 • Fax: (847) 918-3701

Signature _____

Date _____

Attachment GO-PE-9003-6
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DESIGN STAGE TICKETS

PURPOSE

To provide general guidelines on the process to complete PA 1 Call Design ticket requests

PROCESS

USIC, Inc.

Receives all Design request tickets from PA 1 Call

Reviews the scope of the ticket and prints all appropriate PECO underground facility maps within the defined job scope

Completes the PECO/USIC Design Ticket form letter (Attachment 1)

Mails the letter and any PECO underground facility maps found within the scope of the PA 1 design ticket to the contact information specified in the PA 1 Call ticket

Maintains a file of all Design request tickets including:

- o A copy of the PA 1 Call ticket
- o A copy of the form letter
- o A record of the prints that were sent

Closes the PA 1 Call ticket using the #2 "Conflict Lines Nearby, Direct Contact to follow by Facility Owner" KARL response code

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Design Ticket PROCESS

PA One Call design tickets in the PECO service territory are sent to the Office Administrator (OA) upon being processed through the USIC server.

Upon receiving the tickets the OA determines the extent of the design ticket that prints are needed for.

The OA selects all main prints that cover the area for all utilities in the services territory (Gas and Electric)

The selected prints are then printed off, stamped with a disclaimer, placed in an envelope or shipping tube along with the contact letter with USIC contact info on it

The ticket is then closed in the One Calls Karl system as "Conflict- Contact to follow"

The prints are then envelope or shipping tube is then taken to the PECO mail room where they are sent to the caller of the One Call

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PECO IT Solutions Damage Prevention Screens

11. Search for HP Cases

12. Search Results



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Member Code (s) : KC
 Beginning Date : 11/1/2011
 Ending Date : 11/2/2011
 Inspection : All

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Row #	Date Received	Ticket Number	Member Code	Criteria List	Address	Coord	Company	City	Completed?	Locator	Remarks
1	11/1/2011	20112072388	KC	Print Problem	MANOR CIRCLE		BRUBACHER EXCAVATING	LOWER SALFORD TWP			View Modify
2	11/1/2011	20113000094	KC	Long Job, Problem Locate, Print Problem, High Profile Customer	HARKLEY ST		SIGNAL SERVICE INC	HORRISTOWN BORO			View Modify
3	11/1/2011	20113010209	KC	High Profile Contractor	1225 MEETINGHOUSE RD		MELCAR	LOWER GWYNEDD TWP			View Modify
4	11/1/2011	20113011968	KC	Transmission Lines, Regulator/Gate Station	807 PAXSON AVE		POCONO TEST BORINGS & DRILLING	CHELTERHAM TWP			View Modify
5	11/1/2011	20113012252	KC	Transmission Lines, Regulator/Gate Station	STATION AVE		RIGGS DISTLER	ABINGTON TWP			View Modify
6	11/1/2011	20113012253	KC	Regulator/Gate Station	COUNTY LINE RD		RIGGS DISTLER	MONTGOMERY TWP			View Modify
7	11/1/2011	20113050015	KC	High Profile Customer	1020 VALLEY FORGE RD		NORTH PENN WTR AUTH	TOWAMENCIN TWP			View Modify
8	11/1/2011	20113050016	KC	High Profile Customer	1020 VALLEY FORGE RD		NORTH PENN WTR AUTH	UPPER GWYNEDD TWP			View Modify
9	11/1/2011	20113060017	KC	High Profile Contractor	739 W DEKALB PIKE		RABE PLUMBING & HEATING	UPPER MERICH TWP			View Modify
10	11/1/2011	20113050099	KC	High Profile Contractor, Problem Locate, Print Problem	2400 SWEDE RD		PENNSYLVANIA AMERICAN WATER	EAST HORRISTON TWP			View Modify

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13. Ticket Details

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NR 0000 0000 11/01/11 08:27:10 2011000017-000 NEN XCRV ENER

-----PENNSYLVANIA UNDERGROUND UTILITY LINE PROTECTION REQUEST-----

Serial Number--[2011000017]-[000] Channel--[0031029] [0217]

Message Type--[NEW] [EXCAVATION] [EMERGENCY]

County--[MONTGOMERY] Municipality--[UPPER MERION INP]
Work Site--[730 W DETALE PIKE]
Nearest Intersection--[S GULPH RD]
Second Intersection--[N GULPH RD]
Subdivision--[] Site Marked In White--[N]
Location Information--
[WORKING AT CHILIS RESTAURANT IN KING OF PRUSSIA, PA. LOCATION IS AT CORNER
OF W DETALE PIKE AND N AND S GULPH RD.]
Caller Lat/Lon--[]
Happo Type--[P] Happo Lat/Lon--
[47.284432/-78.391789,40.083332/-78.389381,40.083218/-79.386705,
40.082740/-78.387919,40.083332/-78.390644]
Map Graphic--[http://www.palcall.org/ViewMap/view.asp?sn=2011000017]

Type of Work--[INSTALL WATER SERV] Depth--[5FT]
Extent of Excavation--[2FT X 100FT] Method of Excavation--[DIGGING]
Direct--[X] Sidewalk--[X] Sub Prop--[X] Pvt Prop--[X] Other--[]

Legal Start Date--[] Through []
Schedule Excavation Date--[01-Nov-11] Dig Time--[0645] Duration--[3 DAYS]
Response Due Date--[01-Nov-11]

Caller--[JOE MCDONOUGH] Phone--[410-284-1040] Ext--[]
Excavator--[BADE PLUMBING & HEATING] Homeowner/Business--[D]
Address--[101 WAVERLY AVE STE C]
City--[MORTON] State--[PA] Zip--[19070]
FAX--[610-338-0955] Email--[none]
Work Being Done For--[AQUA]

Person to Contact--[JOE MCDONOUGH] Phone--[410-476-3374] Ext--[]
Best Time to Call--[ANYTIME]

Prepared--[01-Nov-11] at [0837] by [DEBORAH CONNELLY]

Remarks--
[]

CS 0 CS -COMCAST CABLE H DE 0 DI -U MERION TWP DTIC DTI-U MERION TWP
EI 0 EI -AT&T LOCAL SVCS HRAO HRA-COMCAST-FIBER H3 0 H3 -ACUR PA
H140 H14-AQUA PA INC AHR KC 0 KC -PECO PLMO SP 0 SP -SUNOCO PIPELINE
SUAD SUA-SUNOCO PL YI 0 YI -VERIZON EAST 1

Serial Number--[2011000017]-[000]

----- Copyright (c) 2011 by Pennsylvania One Call System, Inc. -----

Ticket Number: 2011000017

Client Term: NG
Status: Marked
When Statused: 11/1/2011 9:43:21 AM
High Profile: True
Status: True
Assigned To: 780.Alfred Goode

--- Note entered 11/1/2011 8:43:22 AM ---
ring clamp to pole drop to mark private line to trans & meter, ring clamp to get wire to mark line to
diag. get main & svc on opposite side of diag. 3102enb

--- Note entered 11/1/2011 8:43:22 AM ---
UPR-5 XC

Generated: 11/1/2011 10:06:36 PM


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14. Modify – Job Brief (empty sample)



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Vendor	Date Received	Ticket Number	Member Code	Criteria List	
STS	11/1/2011	20113050017	KC	High Profile Contractor	Previous Work
Company			Address		
RABE PLUMBING & HEATING			739 WOEKALB PIKE		
Job Brief / Hazard Recognition Assessment			Immediately report injuries/incidents to supervision		
1 Is all appropriate PPE in place? <input type="checkbox"/> Comments: _____ <input type="checkbox"/> Approved Safety Shoes <input type="checkbox"/> Hard Hat <input type="checkbox"/> Safety Glasses <input type="checkbox"/> FR Vest					
2 Critical steps verified? <input type="checkbox"/> Comments: _____					
3 Error Likely Situations: _____ <input type="checkbox"/> Slip / Trips / Fall Hazard <input type="checkbox"/> Weather <input type="checkbox"/> Dogs / Wild Life <input type="checkbox"/> Line of Fire <input type="checkbox"/> Traffic <input type="checkbox"/> Construction Area <input type="checkbox"/> Fatigue <input type="checkbox"/> Distractions					
4 Worst Thing that could Happen: _____ <input type="checkbox"/> Electrical Shock <input type="checkbox"/> Fire / Explosion <input type="checkbox"/> Accident <input type="checkbox"/> Fall <input type="checkbox"/> Injury					
5 Defenses in Place: _____ <input type="checkbox"/> Three part communication <input type="checkbox"/> Proper PPE <input type="checkbox"/> S.T.A.R. <input type="checkbox"/> Attention to detail <input type="checkbox"/> Eyes on path					
<div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="text-align: center;">  <p>A</p> </div> <div> <p>Awareness Zone: _____</p> </div> </div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="text-align: center;">  <p>C</p> </div> <div> <p>Caution Zone: _____</p> </div> </div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="text-align: center;">  <p>T</p> </div> <div> <p>Task Zone: _____</p> </div> </div>					
<div style="display: flex; justify-content: center; gap: 20px;"> Continue Skip Job Brief </div>					


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15. Modify – Job Brief (populated sample)



**DAMAGE PREVENTION
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Vendor	Date Received	Ticket Number	Member Code	Criteria List	
STS	11/1/2011	20113050017	KC	High Profile Contractor	Previous Work
Company			Address		
RABE PLUMBING & HEATING			739 W DEKALB PIKE		
Job Brief / Hazard Recognition Assessment			Immediately report injuries/incidents to supervision!		
<p>1 Is all appropriate PPE in place? <input checked="" type="checkbox"/> Comments: _____</p> <p> <input checked="" type="checkbox"/> Approved Safety Shoes <input checked="" type="checkbox"/> Hard Hat <input checked="" type="checkbox"/> Safety Glasses <input type="checkbox"/> FR Vest </p>					
<p>2 Critical steps verified? <input checked="" type="checkbox"/> Comments: _____</p>					
<p>3 Error Likely Situations: _____</p> <p> <input type="checkbox"/> Slip / Trips / Fall Hazard <input checked="" type="checkbox"/> Weather <input type="checkbox"/> Dogs / Wild Life <input type="checkbox"/> Line of Fire <input checked="" type="checkbox"/> Traffic <input type="checkbox"/> Construction Area <input type="checkbox"/> Fatigue <input type="checkbox"/> Distractions </p>					
<p>4 Worst Thing that could Happen: _____</p> <p> <input type="checkbox"/> Electrical Shock <input type="checkbox"/> Fire / Explosion <input checked="" type="checkbox"/> Accident <input checked="" type="checkbox"/> Fall <input checked="" type="checkbox"/> Injury </p>					
<p>5 Defenses in Place: _____</p> <p> <input type="checkbox"/> Three part communication <input checked="" type="checkbox"/> Proper PPE <input type="checkbox"/> S.T.A.R. <input checked="" type="checkbox"/> Attention to detail <input checked="" type="checkbox"/> Eyes on path </p>					
<p>A Awareness Zone: _____</p> <p>C Caution Zone: _____</p> <p>T Task Zone: _____</p>					
<p><input type="button" value="Continue"/></p>			<p><input type="button" value="Skip Job Brief"/></p>		



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16. HP Case Detail Entry- (empty sample)

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Vendor	Date Received	Ticket Number	Member Code	Criteria List	Print Number
STS	11/1/2011	20113050017	KC	High Profile Contractor	
Company			Address		
RARE PLUMBING & HEATING			739 W DEKALB PIKE		
Contractor Name	Contractor Phone Number	Contractor City	Type Of Work		
JOE MCDONOUGH	610-284-2060	UPPER MERION TWP	INSTL WATER SERV		
Locator Remarks					
Gas Transmission Line	Contractor excavating within the Row		Witnessed Excavation		
<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>		
DPI Name	Audit Date	Arrival Time	Completion Time		
choose one v	11/2/2011				
For instructions on how to select multiple items in these lists, click here .					
Forms Completed	Information Left With Contract		Status Of Marks		
DDIF Incident Report PILR FC Report Condition Report	PA 1 Law Dig Safe Pocket Guide Mark Out Card Routine Notification Brochure Business Card		Marks OK Marks Off NO Marks Marks Compromised Partial Marks Marks Not Checked		
Inspection Complete					
<input type="checkbox"/> Job Site Visited by Inspector					
<input type="checkbox"/> Preconstruction Meeting					
<input type="checkbox"/> Service Provided by Inspector					
DPI Actions Taken Be specific about... Location - What was verified - Actions performed - Any comments.					
<input type="button" value="Save Changes"/>					



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17. HP Case Detail – (populated sample)

**DAMAGE PREVENTION
HIGH PROFILE CASES**

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Vendor	Date Received	Ticket Number	Member Code	Criteria List	Print Number
STS	11/1/2011	20113050017	KC	High Profile Contractor	
Company			Address		
RABE PLUMBING & HEATING			739 W DEKALB PIKE		
Contractor Name	Contractor Phone Number	Contractor City	Type Of Work		
JOE MCDONOUGH	610-284-2060	UPPER MERION TWP	INSTL WATER SERV		
Locator Remarks					
Gas Transmission Line	Contractor excavating within the Row		Witnessed Excavation		
<input type="checkbox"/>	<input type="checkbox"/>		<input checked="" type="checkbox"/>		
DPI Name	Audit Date	Arrival Time	Completion Time		
choose one	11/2/2011				
For instructions on how to select multiple items in these lists, click here .					
Forms Completed		Information Left With Contract		Status Of Marks	
<input type="checkbox"/> DDIF <input type="checkbox"/> Incident Report <input type="checkbox"/> PILR <input type="checkbox"/> FC Report <input type="checkbox"/> Condition Report		<input type="checkbox"/> PA 1 Law <input type="checkbox"/> Dig Safe Pocket Guide <input type="checkbox"/> Mark Out Card <input type="checkbox"/> Routine Notification Brochure <input type="checkbox"/> Business Card		<input type="checkbox"/> Marks OK <input type="checkbox"/> Marks OK <input type="checkbox"/> NO Marks <input type="checkbox"/> Marks Compromised <input type="checkbox"/> Partial Marks <input type="checkbox"/> Marks Not Checked	
Inspection Complete					
<input checked="" type="checkbox"/> Job Site Visited by Inspector	two way street				
<input type="checkbox"/> Preconstruction Meeting					
<input type="checkbox"/> Service Provided by Inspector					
DPI Actions Taken Be specific about... Location - What was verified - Actions performed - Any comments.					History... (-)
some marks were off and some were missing. completed and corrected all marks.					


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18. Search Results – (after detail saved)



**DAMAGE PREVENTION
HIGH PROFILE CASES**

[Home](#) [Reports](#)

Member Code (s) : KC
 Beginning Date : 11/1/2011
 Ending Date : 11/2/2011
 Inspection : All

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Row #	Date Received	Ticket Number	Member Code	Criteria List	Address	Quad	Company	City	Completed?	Locator Remarks
1	11/1/2011	20112972399	KC	Print Problem	MANOR CIRCLE		BRUBACHER EXCAVATING	LOWER SALFORD TWP		View Modify
2	11/1/2011	20113000084	KC	Long Job, Problem Locate, Print Problem, High Profile Customer	MARKLEY ST		SIGNAL SERVICE INC	HORRISTOWN BORO		View Modify
3	11/1/2011	20113010299	KC	High Profile Contractor	1225 MEETINGHOUSE RD		MELCAR	LOWER GWYNEDD TWP		View Modify
4	11/1/2011	20113011959	KC	Transmission Lines, Regulator/Gate Station	907 PAXSON AVE		POCONO TEST BORINGS & DRILLING	CHELTENHAM TWP		View Modify
5	11/1/2011	20113012252	KC	Transmission Lines, Regulator/Gate Station	STATION AVE		RIGGS DISTLER	ABINGTON TWP		View Modify
6	11/1/2011	20113012253	KC	Regulator/Gate Station	COUNTY LINE RD		RIGGS DISTLER	MONTGOMERY TWP		View Modify
7	11/1/2011	20113050015	KC	High Profile Customer	1020 VALLEY FORGE RD		NORTH PENN WTR AUTH	TOWNEMICH TWP		View Modify
8	11/1/2011	20113050015	KC	High Profile Customer	1020 VALLEY FORGE RD		NORTH PENN WTR AUTH	UPPER GWYNEDD TWP		View Modify
9	11/1/2011	20113050017	KC	High Profile Contractor	739 WOENALB PIKE		RABE PLUMBING & HEATING	UPPER MERION TWP	✓	View Modify
10	11/1/2011	20113050099	KC	High Profile Contractor, Problem Locate, Print Problem	2400 SWEDE RD		PENNSYLVANIA AMERICAN WATER	EAST HORRITON TWP		View Modify

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19. Subsequent Modify Attempt on Same Day



**DAMAGE PREVENTION
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Vendor	Date Received	Ticket Number	Member Code	Criteria List	Previous Work
STS	11/1/2011	20113050017	KC	High Profile Contractor	Previous Work
Company			Address		
RABE PLUMBING & HEATING			739 W DEKALB PIKE		
Job Brief / Hazard Recognition Assessment			Immediately report injuries/incidents to supervision.		

Select Option

This case already has a Job Brief for today.

>>> Create new Job Brief to start a new inspection.

>>> Existing Job Brief still applies. Make changes to earlier inspection.


Gas Damage Prevention

PECO Administrative Procedure

GO-PE-9003

Revision No.: 3

20. Add New HP Case



**DAMAGE PREVENTION
HIGH PROFILE CASES**

[Home](#) [Reports](#)

Vendor	Date Received	Ticket Number	Member Code	Criteria List	Print Number
ST9	11/2/2011	<input type="text"/>	choose one ▾	Other/Unknown Cast Iron Long Job Transmission Lines Blasting High Profile Contractor Heavy Underground Regulator/Gate Station Problem Locale Print Problem Directional Boring/Drilling Road Widening High Profile Customer <small>For instructions on how to select multiple items in this list, click here.</small>	<input type="text"/>

Company	Address		
<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>		
Contractor Name	Contractor Phone Number	Contractor City	Type Of Work
<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>

EXHIBIT C

RECEIVED

JAN 8 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Summary of PA One Call Tickets and Responses for Rosemont College Construction Project

Date of One Call Request	One Call Ticket Number	Contractor Submitting Request	Type of Work Being Performed By Contractor	Date of PECO's Response to Request	PECO's Reponse To One Call Ticket
6/17/2011	20111682524	Turner Land Surveying	House and Drive Modification Landscaping	6/20/2011	Design/Conflict
12/20/2012	20123551597	PR Environmental Designs Inc	Test Pits	12/24/2012	Routine / Marked
12/21/2012	20123561308	Environmental Management Group	Remove Underground Tank	12/28/2012	Routine / Marked
12/27/2012	20123621150	Turner Land Surveying	Capital Improvements	1/3/2013	Routine / Clear-No Facilities
1/4/2013	20130040494	PR Environmental Designs Inc	Damage Cut/Pulled Comcast Line	1/4/2013	Emergency / Marked
1/7/2013	20130071986	Turner Land Surveying	Capitol Improvements	1/8/2013	Design/Conflict
1/11/2013	20130111778	PR Environmental Designs Inc	Test Pits	1/15/2013	Routine / Marked
1/25/2013	20130251563	PR Environmental Designs Inc	Test Pits	1/28/2013	Routine / Marked
3/14/2013	20130731577	Rosemont College	Construct Athletic Field	3/15/2013	Routine / Marked
5/13/2013	20131330232	Schlouch Inc	Field Reconstruction	5/16/2013	Routine / Marked
5/22/2013	20131421231	Robert Foss Electric	Install Electric Service & Generator	5/28/2013	Routine / Marked
6/4/2013	20131551660	Schlouch Inc	Field Reconstruction	6/6/2013	Routine / Marked
6/28/2013	20131790696	Schlouch Excavating Company	Field Reconstruction	7/3/2013	Routine / Marked
7/3/2013	20131840770	Robert Foss Electric	Install Electric Service & Generator	7/8/2013	Routine / Marked
7/12/2013	20131930871	Cavan Construction Company Inc	Install Footings	7/15/2013	Insufficient Time Provided by Contractor / Markec
7/16/2013	20131970626	Cavan Construction Company Inc	Install Footings	7/16/2013	Insufficient Time Provided by Contractor / Markec
8/7/2013	20132192985	PECO Energy	Repair Gas Leak	8/7/2013	Emergency / Marked
8/8/2013	20132200770	Schlouch Excavating Company	Field Reconstruction	8/12/2013	Routine / Clear-No Facilities
8/16/2013	20132200925	Robert Foss Electric	Drilling Post Holes	8/16/2013	Emergency / Not Marked Due to No Access (error - according to USIC manager, line was marked but response was entered incorrectly in KARL system)

RECEIVED

JAN 8 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

EXHIBIT D

RECEIVED

JAN 8 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

CDC 00000 POCS MM/DD/YY TT:TT:TT 20111682524-000 NEW XCAV DSGN

=====PENNSYLVANIA UNDERGROUND UTILITY LINE PROTECTION REQUEST=====

Serial Number--[20111682524]-[000] Channel#--[1912WEB][0078]

Message Type--[NEW][EXCAVATION][DESIGN]

County--[MONTGOMERY] Municipality--[LOWER MERION TWP]

Work Site--[1320 WENDOVER]

Nearest Intersection--[MONTGOMERY AVE]

Second Intersection--[AIRDALE ROAD]

Subdivision--[]

Site Marked in White--[N]

Location Information--

[SITE IS ROSEMONT COLLEGE]

Caller Lat/Lon--[]

Mapped Type--[P] Mapped Lat/Lon--

[40.031124/-75.327344,40.030621/-75.329004,40.032384/-75.331105,

40.033225/-75.327036,40.032107/-75.327705]

Map Graphic--[<http://www.pa1call.org/ViewMap/view.aspx?sn=20111682524>]

Type of Work--[HOUSE AND DRIVE MODIFICATION; LANDSCAPING] Depth--[]

Extent of Excavation--[] Method of Excavation--[]

Street--[X] Sidewalk--[X] Pub Prop--[X] Pvt Prop--[X] Other--[]

Lawful Start Dates--[] Through []

Scheduled Excavation Date--[DESIGN]

Response Due Date--[01-Jul-11]

Caller--[CHRIS GRIFFO] Phone--[610-489-7797] Ext--[]

Excavator--[TURNER LAND SURVEYING] Homeowner/Business--[B]

Address--[3941 CROSSKEYS RD]

City--[COLLEGEVILLE] State--[PA] Zip--[19426]

FAX--[610-489-0791] Email--[clgriffo@comcast.net]

Work Being Done For--[SITE ENGINEERING CONCEPTS]

Person to Contact--[CHRIS GRIFFO] Phone--[610-489-7797] Ext--[]

Best Time to Call--[ANYTIME]

Prepared--[17-Jun-11] at [1913] by [CHRIS GRIFFO]

Remarks--

[REQUESTING PRINTS AND EMAIL CONFORMATION]

AD 0 AD=L MERION T ATM0 ATM=AT&T ATLANTA. DA 0 DA=COMCAST LWR MER

HTD0 HTD=AQUA PA DESIGN KE 0 KE=PECO MRTN LKC0 LKC=LEVEL 3 COMM

MI 0 MI=MCI/VERIZON BUS MMF0 MMF=ABOVENET COMM YI 0 YI=VERIZON EAST I

Serial Number--[20111682524]-[000]

===== Copyright (c) 2011 by Pennsylvania One Call System, Inc. =====

Design Contact Information

COMPANY: LOWER MERION TOWNSHIP

ADDRESS: 75 E LANCASTER AVE

RECEIVED

JAN 8 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

ARDMORE, PA. 19003
CONTACT: PETER L MANCINI

COMPANY: AT&T
ADDRESS: 2315 SALEM RD F11
CONYERS, GA. 30013
CONTACT: NANCY SPENCE
EMAIL: nspence@ems.att.com

COMPANY: COMCAST CABLEVISION OF LOWER MERION INC
ADDRESS: 110 SPRINGBROOKE BLVD
ASTON, PA. 19014
CONTACT: PAUL DABALDO
EMAIL: paul_dabaldo@cable.comcast.com

COMPANY: AQUA PENNSYLVANIA INC
ADDRESS: 762 W LANCASTER AVE
BRYN MAWR, PA. 19010
CONTACT: STEVE PIZZI

COMPANY: PECO ENERGY
ADDRESS: C/O STS LLC
1004 W 8TH AVE
KING OF PRUSSIA, PA. 19406
CONTACT: WAYNE VINCENT
EMAIL: wvincent@stsus.net

COMPANY: LEVEL 3 COMMUNICATIONS LLC
ADDRESS: 1025 ELDORADO BLVD BLDG
BROOMFIELD, CO. 80021
CONTACT: LEVEL 3 OPERATOR
EMAIL: level3networkrelocations@level3.com

COMPANY: VERIZON BUSINESS
ADDRESS: 2400 N GLENVILLE
RICHARDSON, TX. 75082
CONTACT: DEAN BOYERS
EMAIL: dean.boyers@mci.com

COMPANY: ABOVENET COMMUNICATIONS INC
ADDRESS: 337 CIRCLE O PROGRESS DR
POTTSTOWN, PA. 19464
CONTACT: CHRIS RICCIUTI
EMAIL: chris.ricciuti@above.net

COMPANY: VERIZON PENNSYLVANIA INC
ADDRESS: 6TH FLOOR
900 RACE STREET
PHILADELPHIA, PA. 19107
CONTACT: SUZETTE WALKER

**Pennsylvania One Call
System Response List**

Responses for Serial Number:
20111682524 as of 1/6/2016
6:37 AM

CDC	MEMBER NAME
KENNEDY	PECO ENERGY

RESPONSE	RESPONSE DATE	INITIALS
CONFLICT. LINES NEARBY. DIRECT CONTACT	6/20/2011 10:29	UQ-

CDC 00000 POCs MM/DD/YY TT:TT:TT 20123551597-000 NEW XCAV RTN

=====PENNSYLVANIA UNDERGROUND UTILITY LINE PROTECTION REQUEST=====

Serial Number--[20123551597]-[000] Channel--[1639032][0229]
Message Type--[NEW][EXCAVATION][ROUTINE]

County--[MONTGOMERY] Municipality--[LOWER MERION TWP]

Work Site--[WENDOVER RD]

Nearest Intersection--[MONTGOMERY AVE]

Second Intersection--[]

Subdivision--[]

Site Marked in White--[N]

Location Information--

[THE ADDRESS FOR ROSEMONT COLLEGE IS 1400 W MONTGOMERY AVE. BUT THE WORK
WILL TAKE PLACE ON AN ATHLETIC FIELD W OF WENDOVER RD. WORK WILL NOT
EXTEND PAST THE N ENTRANCE OF KAUL HALL.]

Caller Lat/Lon--[]

Mapped Type--[P] Mapped Lat/Lon--

[40.032839/-75.330162,40.033874/-75.326879,40.030120/-75.326911,
40.030005/-75.328585]

Map Graphic--[http://www.pa1call.org/ViewMap/view.aspx?sn=20123551597]

Type of Work--[TEST PITS] Depth--[12FT]

Extent of Excavation--[] Method of Excavation--[DIGGING]

Street--[] Sidewalk--[] Pub Prop--[] Pvt Prop--[X] Other--[]

Lawful Start Dates--[27-Dec-12] thru [07-Jan-13] Response Due Date--[26-Dec-12]

Scheduled Excavation Date--[27-Dec-12] Dig Time--[0800] Duration--[1 DAY]

Caller--[PAUL ROSONE]

Caller Phone--[610-842-3728] Caller Ext--[]

Excavator--[PR ENVIRONMENTAL DESIGNS INC]

Address--[207 S WHITE HORSE RD]

City--[PHOENIXVILLE] State--[PA] Zip--[19460]

FAX--[] Caller Type--[B]

Email--[prenvirodesigns@hotmail.com]

Work For--[ROSEMONT COLLEGE]

Person to Contact--[PAUL ROSONE]

Contact Phone--[610-842-3728] Contact Ext--[]

Best Time to Call--[ANYTIME]

Prepared--[20-Dec-12] at [1643] by [KATHARINE DAMICO]

Remarks--

[]

AD 0 AD=L MERIONT ATM0 ATM=AT&T ATLANTA DA 0 DA =COMCAST LWR MER
HS 0 HS =AQUA PA KE 0 KE =PECO MRTN LKC0 LKC=LEVEL 3 COMM
MI 0 MI =MCI/VERIZON BUS PLL0 PLI.=ZAYO BANDWIDTH YI 0 YI =VERIZON EAST I

Serial Number--[20123551597]-[000]

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Dist Range Lookup	Serial Number Lookup	Municipal Unit Lookup	Pennsylvania Damages Database	Results to PDF Sheet
Serial Number Lookup				
CDC:	SERIAL NUMBER:			
ALL	20123551597	Home Equity		
		Residence		

PRINT	Export to Excel			
Pennsylvania One Call System Response List				
Responses for Serial Number: 20123551597 as of 8/23/2013 10:52 AM				
CDC	MEMBER NAME	RESPONSE	RESPONSE DATE	INITIALS
NE	PECO ENERGY	MARKED	12/24/2012 15:48:16	CLS

CDC 00000 POCS MM/DD/YY TT:TT:TT 20123561308-000 NEW XCAV RTN

=====PENNSYLVANIA UNDERGROUND UTILITY LINE PROTECTION REQUEST=====

Serial Number--[20123561308]-[000] Channel#--[1706033][0220]
Message Type--[NEW][EXCAVATION][ROUTINE]

County--[MONTGOMERY] Municipality--[LOWER MERION TWP]

Work Site--[1400 MONTGOMERY AVE]

Nearest Intersection--[DID NOT KNOW]

Second Intersection--[]

Subdivision--[]

Site Marked in White--[N]

Location Information--

[MARKED WITH AN ORANGE STAKE. WORKING AT THE ROSEMONT COLLEGE AT THE
HEFFERNAN HALL.]

Caller Lat/Lon--[]

Mapped Type--[P] Mapped Lat/Lon--

[40.035457/-75.329470;40.034812/-75.329797;40.034475/-75.328692,
40.035230/-75.328542]

Map Graphic--[http://www.pa1call.org/ViewMap/view.aspx?sn=20123561308]

Type of Work--[REMOVE UG TANK] Depth--[16FT]

Extent of Excavation--[18FT X 10FT] Method of Excavation--[DIGGING]

Street--[] Sidewalk--[] Pub Prop--[] Pvi Prop--[X] Other--[]

Lawful Start Dates--[02-Jan-13] thru [08-Jan-13] Response Due Date--[01-Jan-13]

Scheduled Excavation Date--[02-Jan-13] Dig Time--[0800] Duration--[3 DAYS]

Caller--[KURT SPIESS]

Caller Phone--[610-359-1730]

Caller Ext--[]

Excavator--[ENVIRONMENTAL MANAGEMENT GROUP]

Address--[PO BOX 129]

City--[EDGEMONT]

State--[PA] Zip--[19028-0129]

FAX--[610-359-1734]

Caller Type--[B]

Email--[kspiess@emgpa.com]

Work For--[TOM SZATKOWSKI]

Person to Contact--[KURT SPIESS]

Contact Phone--[610-359-1730]

Contact Ext--[]

Best Time to Call--[0900-1700]

Prepared--[21-Dec-12] at [1710] by [AMANDA SULLIVAN]

Remarks--

[ONCE ON CAMPUS, CONTACT PUBLIC SAFETY @ 610-527-1038 FOR EXACT LOCATION.]

AD 0 AD=L MERION T ATM 0 ATM=AT&T ATLANTA DA 0 DA=COMCAST LWR MER

HS 0 HS=AQUA PA KE 0 KE=PECO MRTN LK 0 LK=LEVEL 3 COMM

Y1 0 Y1=VERIZON EAST I

Serial Number--[20123561308]-[000]

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[Date Range Lookup](#) | [Serial Number Lookup](#) | [Locations List Lookup](#) | [Pennsylvania Damages Database](#) | [Return to POC'S List](#)

Serial Number Lookup

CDC: SERIAL NUMBER:

ALL 20123561308

Ticket Inquiry
Response

PRINT	Export to Excel			
Pennsylvania One Call System Response List				
Response for Serial Number: 20123561308 as of 8/23/2013 10:53 AM				
CDC	MEMBER NAME	RESPONSE	RESPONSE DATE	INITIALS
YE	PECO ENERGY	MARKED	12/28/2012 15:10:54	CLS

CDC 00000 POCs MM/DD/YY TT:TT:TT 20123621150-000 NEW XCAV RTN

=====PENNSYLVANIA UNDERGROUND UTILITY LINE PROTECTION REQUEST=====

Serial Number--(20123621150)-(000) Channel#--(1610WEB)(0347)
 Message Type--(NEW)(EXCAVATION)(ROUTINE)

County--(MONTGOMERY) Municipality--(LOWER MERION TWP)
 Work Site--(1400 MONTGOMERY AVENUE)
 Nearest Intersection--(WENDOVER RD)
 Second Intersection--(CURWIN ROAD)
 Subdivision--[], Site Marked in White--(Y)

Location Information--
 (SITE IS ROSEMONT COLLEGE)
 Caller Lat/Lon--[]

Mapped Type--(P) Mapped Lat/Lon--
 [40.035685/-75.331352,40.036588/-75.328743,40.033615/-75.326716,
 40.032556/-75.327486,40.031196/-75.329639,40.033194/-75.332390]
 Map Graphic--(http://www.pa1call.org/ViewMap/view.aspx?sn=20123621150)

Type of Work--(CAPITAL IMPROVEMENTS) Depth--[]
 Extent of Excavation--[] Method of Excavation--[]
 Street--(X) Sidewalk--(X) Pub Prop--(X) Pvt Prop--(X) Other--[]

Lawful Start Dates--(03-Jan-13) thru (11-Jan-13) Response Due Date--(02-Jan-13)
 Scheduled Excavation Date--(03-Jan-13) Dig Time--(0700) Duration--(1 DAY)

Caller--(CHRISTOPHER GRIFFO)
 Caller Phone--(610-489-7797) Caller Ext--[]
 Excavator--(TURNER LAND SURVEYING)
 Address--(3941 CROSSKEYS ROAD)
 City--(COLLEGEVILLE) State--(PA) Zip--(19426)
 FAX--(610-489-0791) Caller Type--(B)
 Email--(CLGRIFFO@COMCAST.NET)
 Work For--(SITE ENGINEERING CONCEPTS)

Person to Contact--(CHRIS GRIFFO)
 Contact Phone--(610-489-7797) Contact Ext--[]
 Best Time to Call--(ANYTIME)

Prepared--(27-Dec-12) at (1615) by (CLGRIFFO)

Remarks--
 (RIGHT OF WAY OF MONTGOMERY & WENDOVER HAVE BEEN MARKED IN WHITE.)

AD 0 AD=L MERION T ATM 0 ATM=AT&T ATLANTA DA 0 DA=COMCAST I.WR MER
 HS 0 HS=AQUA PA KE 0 KE=PECO MRTN LKCO LKC=LEVEL 3 COMM
 MI 0 MI=MC/VERIZON BUS PLL 0 PLL=ZAYO BANDWIDTH YI 0 YI=VERIZON EAST I

Serial Number--(20123621150)-(000)

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Serial Number Lookup

CDC: SERIAL NUMBER:

ALL 20123621150

<input type="button" value="PRINT"/>	<input type="button" value="Export to Excel"/>															
<p>Pennsylvania One Call System Response List</p> <p>Responses for Serial Number: 20123621150 as of 8/23/2013 10:51 AM</p> <table border="1"> <thead> <tr> <th>CDC</th> <th>MEMBER NAME</th> <th>RESPONSE</th> <th>RESPONSE DATE</th> <th>INITIALS</th> </tr> </thead> <tbody> <tr> <td>NE</td> <td>PECO ENERGY</td> <td>CLEAR - NO FACILITIES</td> <td>01/03/2013 16:13:51</td> <td>CIS</td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>		CDC	MEMBER NAME	RESPONSE	RESPONSE DATE	INITIALS	NE	PECO ENERGY	CLEAR - NO FACILITIES	01/03/2013 16:13:51	CIS					
CDC	MEMBER NAME	RESPONSE	RESPONSE DATE	INITIALS												
NE	PECO ENERGY	CLEAR - NO FACILITIES	01/03/2013 16:13:51	CIS												

CDC 00000 POCs MM/DD/YY TT:TT:TT 20130040494-000 NEW DAMG EMER

=====**PENNSYLVANIA UNDERGROUND UTILITY LINE PROTECTION REQUEST**=====

Serial Number--[20130040494]-[000] Channel#--[0938017][0191]

Message Type--[NEW][DAMAGE][EMERGENCY]

County--[MONTGOMERY] Municipality--[LOWER MERION TWP]

Work Site--[WENDOVER RD]

Nearest Intersection--[MONTGOMERY AVE]

Second Intersection--[]

Subdivision--[]

Site Marked in White--[N]

Location Information--

[THE ADDRESS FOR ROSEMONT COLLEGE IS 1400 W MONTGOMERY AVE. BUT THE WORK WILL TAKE PLACE ON AN ATHLETIC FIELD W OF WENDOVER RD. WORK WILL NOT EXTEND PAST THE N ENTRANCE OF KAUL HALL.]

Caller Lat/Lon--[]

Mapped Type--[P] Mapped Lat/Lon--

[40.032839/-75.330162,40.033874/-75.326879,40.030120/-75.326911, 40.030005/-75.328585]

Map Graphic--[http://www.palcall.org/ViewMap/view.aspx?sn=20130040494]

Type of Work--[DAMAGED CUT/PULLED COMCAST LINE] Depth--[1FT]

Extent of Excavation--[] Method of Excavation--[DIGGING]

Street--[] Sidewalk--[] Pub Prop--[] Pvt Prop--[X] Other--[]

Lawful Start Dates--[] thru [] Response Due Date--[04-Jan-13]

Scheduled Excavation Date--[04-Jan-13] Dig Time--[0945] Duration--[]

Caller--[PAUL ROSONE]

Caller Phone--[610-842-3728] Caller Ext--[]

Excavator--[PR ENVIRONMENTAL DESIGNS INC]

Address--[207 S WHITE HORSE RD]

City--[PHOENIXVILLE]

State--[PA] Zip--[19460]

FAX--[] Caller Type--[B]

Email--[prenvirodesigns@hotmail.com]

Work For--[ROSEMONT COLLEGE]

Person to Contact--[PAUL ROSONE]

Contact Phone--[610-842-3728] Contact Ext--[]

Best Time to Call--[ANYTIME]

Prepared--[04-Jan-13] at [0941] by [STACY SURMICK]

Remarks--

[CREW:ON SITE. CALLER STATES THAT LINE WAS UNMARKED.

*****=ADDITIONAL DAMAGE INFORMATION=*****

FACILITY TYPES: CABLE TV, TELECOMMUNICATIONS

EXCAVATION EQUIPMENT: TRACKHOE

HAZARDOUS RELEASE: NO]

AD 0 AD=L MERION T ATM0 ATM=AT&T ATLANTA DA 0 DA=COMCAST LWR MER

HS 0 HS=AQUA PA KE 0 KE=PECO MRTN LK0 LK=LEVEL 3 COMM

MI 0 MI=MC/VERIZON BUS PLL0 PLL=ZAYO BANDWIDTH YI 0 YI=VERIZON EAST 1

Serial Number Lookup

CDC: SERIAL NUMBER:

<input type="button" value="PRINT"/>	<input type="button" value="Export to Excel"/>			
Pennsylvania One Call System Response List				
Responses for Serial Number: 20130040494 as of 8/23/2013 11:02 AM				
CDC	MEMBER NAME	RESPONSE	RESPONSE DATE	INITIALS
KE	PECO ENERGY	MARKED	01/04/2013 10:53:01	CLS

CDC 00000 POCS MM/DD/YY TT:TT:TT 20130071986-000 NEW XCAV DSGN

=====PENNSYLVANIA UNDERGROUND UTILITY LINE PROTECTION REQUEST=====

Serial Number--[20130071986]-[000] Channel#--[1553WEB][0590]

Message Type--[NEW][EXCAVATION][FINAL DESIGN]

County--[MONTGOMERY] Municipality--[LOWER MERION TWP]

Work Site--[1400 MONTGOMERY AVENUE]

Nearest Intersection--[WENDOVER ROAD]

Second Intersection--[CURWIN ROAD]

Subdivision--[]

Site Marked in White--[N]

Location Information--

[SITE IS ROSEMONT COLLEGE]

Caller Lat/Lon--[]

Mapped Type--[P] Mapped Lat/Lon--

[40.030776/-75.327428,40.030455/-75.328970,40.032448/-75.331117,

40.033025/-75.327650,40.031938/-75.327699,40.031409/-75.327711]

Map Graphic--[<http://www.pa1call.org/ViewMap/view.aspx?sn=20130071986>]

Type of Work--[CAPITAL IMPROVEMENTS]

Depth--[]

Extent of Excavation--[]

Method of Excavation--[]

Street--[X] Sidewalk--[X] Pub Prop--[X] Pvt Prop--[X] Other--[DESIGN]

Lawful Start Dates--[] thru [] Response Due Date--[22-Jan-13]

Scheduled Excavation Date--[DESIGN]

Caller--[CHRISTOPHER GRIFFO]

Caller Phone--[610-489-7797]

Caller Ext--[]

Excavator--[TURNER LAND SURVEYING]

Address--[3941 CROSSKEYS ROAD]

City--[COLLEGEVILLE]

State--[PA] Zip--[19426]

FAX--[610-489-0791]

Caller Type--[B]

Email--[CLGRIFFO@COMCAST.NET]

Work For--[SITE ENGINEERING CONCEPTS]

Person to Contact--[MICHAEL DEPIETROPAOLO CELL# 484-358-5954]

Contact Phone--[610-489-7797]

Contact Ext--[]

Best Time to Call--[ANYTIME]

Prepared--[07-Jan-13] at [1603] by [CLGRIFFO]

Remarks--

[MESSAGE TO WALT THE GAS LOCATOR. I UPLOADED A PDF OF THE EXACT AREA WE ARE WORKING. CONTACT MIKE 484-358-5954 WITH QUESTIONS AND IF YOU NEED HIM TO MEET YOU AT THE SITE. IF YOU NEED THE PDF PLEASE EMAIL ME CLGRIFFO@COMCAST.NET

UPLOADED DOCUMENT AVAILABLE AT:

<http://www.pa1call.org/ViewMap/view.aspx?sn=20130071986&DE=1>

AD 0 AD=L MERION T ATM0 ATM=AT&T ATLANTA DA 0 DA=COMCAST LWR MER

HTD0 HTD=AQUA PA DESIGN KE 0 KE=PECO MRTN LK0 LK=LEVEL 3 COMM

MI 0 MI=MCI/VERIZON BUS PLL0 PLL=ZAYO BANDWIDTH YI 0 YI=VERIZON EAST 1

Serial Number--[20130071986]-[000]

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Design Contact Information

COMPANY: LOWER MERION TOWNSHIP
ADDRESS: 75 E LANCASTER AVE
ARDMORE, PA. 19003
CONTACT: PETER L MANCINI

COMPANY: AT&T
ADDRESS: 2315 SALEM RD F11
CONYERS, GA. 30013
CONTACT: NANCY SPENCE
EMAIL: nspence@ems.att.com

COMPANY: COMCAST CABLEVISION OF LOWER MERION INC
ADDRESS: 1004 CORNERSTONE BLVD
DOWNTOWN, PA. 19335
CONTACT: LEE MCGARRITY
EMAIL: lee_mcgarrity@cable.comcast.com

COMPANY: AQUA PENNSYLVANIA INC
ADDRESS: 762 W LANCASTER AVE
BRYN MAWR, PA. 19010
CONTACT: STEVE PIZZI
EMAIL: sbpizzi@aquaamerica.com

COMPANY: PECO ENERGY
ADDRESS: C/O USIC
450 S HENDERSON RD SUITE B
KING OF PRUSSIA, PA. 19406
CONTACT: GAVIN HEWITT
EMAIL: gavinhe Witt@usicinc.com

COMPANY: LEVEL 3 COMMUNICATIONS LLC
ADDRESS: 1025 ELDORADO BLVD BLDG
BROOMFIELD, CO. 80021
CONTACT: LEVEL 3 OPERATOR
EMAIL: level3networkrelocations@level3.com

COMPANY: VERIZON BUSINESS
ADDRESS: 2400 N GLENVILLE
RICHARDSON, TX. 75082
CONTACT: DEAN BOYERS
EMAIL: dean.boyers@verizon.com

COMPANY: ZAYO BANDWIDTH FORMERLY PPL TELCOM LLC
ADDRESS: C/O STAKE CENTER LOCATING
2920 W DIRECTORS ROW
SALT LAKE CITY, UT. 84104
CONTACT: DAVE MOSIER
EMAIL: locatetickets@sctrl.com

COMPANY: VERIZON PENNSYLVANIA LLC

ADDRESS: 180 SHEREE BLVD STE 2100 ROOM N/A
EXTON, PA. 19341

CONTACT: KELLY BLOUNT

EMAIL: kelley.b.blount@verizon.com

Pennsylvania One Call System Response List

Responses for Serial Number: 20130071986 as of 1/6/2016 6:39 AM

CDC	MEMBER NAME	RESPONSE	RESPONSE DATE	INITIALS
FE	REC'D ENERGY	CONFLICT. LINES NEARBY. DIRECT CONTACT TO FOLLOW BY FACILITY OWNER	01/04/2016 12:15:16	GIS

CDC 00000 POCS MM/DD/YY TT:TT:TT 20130111778-000 NEW XCAV RTN

=====PENNSYLVANIA UNDERGROUND UTILITY LINE PROTECTION REQUEST=====

Serial Number--[20130111778]-[000] Channel#--[1756027][0119]

Message Type--[NEW][EXCAVATION][ROUTINE]

County--[MONTGOMERY] Municipality--[LOWER MERION TWP]

Work Site--[WENDOVER RD]

Nearest Intersection--[MONTGOMERY AVE]

Second Intersection--[]

Subdivision--[]

Site Marked in White--[N]

Location Information--

[THE ADDRESS FOR ROSEMONT COLLEGE IS 1400 W MONTGOMERY AVE. BUT THE WORK WILL TAKE PLACE ON AN ATHLETIC FIELD W OF WENDOVER RD. WORK WILL NOT EXTEND PAST THE N ENTRANCE OF KAUL HALL.]

Caller Lat/Lon--[]

Mapped Type--[P] Mapped Lat/Lon--

[40.032839/-75.330162,40.033874/-75.326879,40.030120/-75.326911,

40.030005/-75.328585]

Map Graphic--[http://www.pa1call.org/ViewMap/view.aspx?sn=20130111778]

Type of Work--[TEST PITS]

Depth--[12FT]

Extent of Excavation--[]

Method of Excavation--[DIGGING]

Street--[] Sidewalk--[] Pub Prop--[] Pvt Prop--[X] Other--[]

Lawful Start Dates--[16-Jan-13] thru [28-Jan-13] Response Due Date--[15-Jan-13]

Scheduled Excavation Date--[16-Jan-13] Dig Time--[0800] Duration--[1 DAY]

Caller--[PAUL ROSONE]

Caller Phone--[610-842-3728]

Caller Ext--[]

Excavator--[PR ENVIRONMENTAL DESIGNS INC]

Address--[207 S WHITE HORSE RD]

City--[PHOENIXVILLE]

State--[PA] Zip--[19460]

FAX--[]

Caller Type--[B]

Email--[prenvirodesigns@hotmail.com]

Work For--[ROSEMONT COLLEGE]

Person to Contact--[PAUL ROSONE]

Contact Phone--[610-842-3728]

Contact Ext--[]

Best Time to Call--[ANYTIME]

Prepared--[11-Jan-13] at [1758] by [LAUREN SIDWELL]

Remarks--

[]

AD 0 AD=L.MERION T ATM0 ATM=AT&T ATLANTA DA 0 DA=COMCAST LWR MER

HS 0 HS=AQUA PA KE 0 KE=PECO MRTN LKC 0 LKC=LEVEL 3 COMM

MI 0 MI=MC/VERIZON BUS PLL 0 PLL=ZAYO BANDWIDTH YI 0 YI=VERIZON EAST I

Serial Number--[20130111778]-[000]

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Serial Number Lookup

CDC: SERIAL NUMBER:

ALL 20130111778

Pennsylvania One Call System Response List

Responses for Serial Number: 20130111778 as of 8/23/2013 10:58 AM

CDC	MEMBER NAME	RESPONSE	RESPONSE DATE	INITIALS
KE	PECO ENERGY	MARKED	01/15/2013 14:04:10	CLS

CDC 00000 POCS MM/DD/YY TT:TT:TT 20130251563-000 NEW XCAV RTN

=====**PENNSYLVANIA UNDERGROUND UTILITY LINE PROTECTION REQUEST**=====

Serial Number--[20130251563]-[000] Channel#--[1800033][0101]

Message Type--[NEW][EXCAVATION][ROUTINE]

County--[MONTGOMERY] Municipality--[LOWER MERION TWP]

Work Site--[WENDOVER RD]

Nearest Intersection--[MONTGOMERY AVE]

Second Intersection--[]

Subdivision--[] Site Marked in White--[N]

Location Information--

[THE ADDRESS FOR ROSEMONT COLLEGE IS 1400 W MONTGOMERY AVE. BUT THE WORK WILL TAKE PLACE ON AN ATHLETIC FIELD W OF WENDOVER RD. WORK WILL NOT EXTEND PAST THE N ENTRANCE OF KAUL HALL.]

Caller Lat/Lon--[]

Mapped Type--[P] Mapped Lat/Lon--

[40.035763/-75.328231,40.033782/-75.332790,40.028449/-75.328743,40.029723/-75.323801]

Map Graphic--[http://www.pa1call.org/ViewMap/view.aspx?sn=20130251563]

Type of Work--[TEST PITS] Depth--[12FT]

Extent of Excavation--[] Method of Excavation--[DIGGING]

Street--[] Sidewalk--[] Pub Prop--[] Pvt Prop--[X] Other--[]

Lawful Start Dates--[30-Jan-13] thru [06-Feb-13] Response Due Date--[29-Jan-13]

Scheduled Excavation Date--[30-Jan-13] Dig Time--[0800] Duration--[1 DAY]

Caller--[PAUL ROSONE]

Caller Phone--[610-842-3728] Caller Ext--[]

Excavator--[PR ENVIRONMENTAL DESIGNS INC]

Address--[207 S WHITE HORSE RD]

City--[PHOENIXVILLE] State--[PA] Zip--[19460]

FAX--[] Caller Type--[B]

Email--[prenvirodesigns@hotmail.com]

Work For--[ROSEMONT COLLEGE]

Person to Contact--[PAUL ROSONE]

Contact Phone--[610-842-3728] Contact Ext--[]

Best Time to Call--[ANYTIME]

Prepared--[25-Jan-13] at [1802] by [VALERIE HENZE]

Remarks--

[]

AD 0 AD=L MERION T ATM0 ATM=AT&T ATLANTA DA 0 DA=COMCAST LWR MER
HS 0 HS=AQUA PA HSP0 HSF=COMCAST CABLE-F KE 0 KE=PECO MRTN
LKC0 LKC=LEVEL 3 COMM MI 0 MI=MCI PLL0 PLL=ZAYO BANDWIDTH
YI 0 YI=VERIZON EAST I

Serial Number--[20130251563]-[000]

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Serial Number Lookup

CDC: SERIAL NUMBER:

ALL 20130251563

Pennsylvania One Call System Response List

Responses for Serial Number: 20130251563 as of 8/23/2013 10:56 AM

CDC	MEMBER NAME	RESPONSE	RESPONSE DATE	INITIALS
KE	PECO ENERGY	MARKED	01/28/2013 12:21:06	CLS

CDC 00000 POCS MM/DD/YY TT:TT:TT 20130731577-000 NEW XCAV RTN

=====PENNSYLVANIA UNDERGROUND UTILITY LINE PROTECTION REQUEST=====

Serial Number--[20130731577]-[000] Channel#--[1235013][1119]
Message Type--[NEW][EXCAVATION][ROUTINE]

County--[MONTGOMERY] Municipality--[LOWER MERION TWP]
Work Site--[1400 MONTGOMERY AVE]
Nearest Intersection--[WENDOVER AVE]
Second Intersection--[]
Subdivision--[] Site Marked in White--[Y]

Location Information--
(LOCATION IS OFF OF THE SW SIDE OF MONTGOMERY AVE. WORKING AT 2 LOCATIONS
ON CAMPUS OF ROSEMONT COLLEGE. WORKING AT KAUL HALL & KISSTLER LIBRARY.
BOTH BLDGS ARE W OF WENDOVER RD & E OF ORCHARD WAY, WHICH IS W OF THE RR
TRACKS. EXCAVATION DOES NOT GO S OF THE ATHLETIC FIELD, S OF THE
IMMACULATE CONCEPTION CHAPEL. CAMPUS IS BOUNDED BY MONTOMERY AVE, AIRDALE
RD, THE RR TRACKS, CURWEN RD.)

Caller Lat/Lon--[]
Mapped Type--[P] Mapped Lat/Lon--
(40.030753/-75.329003,40.031278/-75.327523,40.033496/-75.326686,
40.034663/-75.327491,40.032971/-75.331696)
Map Graphic--[http://www.pa1call.org/ViewMap/view.aspx?sn=20130731577]

Type of Work--[CONST ATHLETIC FIELD] Depth--[8FT]
Extent of Excavation--[] Method of Excavation--[DIGGING]
Street--[] Sidewalk--[] Pub Prop--[] Pvt Prop--[X] Other--[]

Lawful Start Dates--[19-Mar-13] thru [28-Mar-13] Response Due Date--[18-Mar-13]
Scheduled Excavation Date--[19-Mar-13] Dig Time--[0700] Duration--[3 DAYS]

Caller--[TOM SZATKOWSKI]
Caller Phone--[610-527-0100] Caller Ext--[]
Excavator--[ROSEMONT COLLEGE]
Address--[1400 MONTGOMERY AVE]
City--[ROSEMONT] State--[PA] Zip--[19010]
FAX--[610-526-2954] Caller Type--[B]
Email--[TSZATKOWSKI@ROSEMONT.EDU]
Work For--[ROSEMONT COLLEGE]

Person to Contact--[TOM SZATKOWSKI]
Contact Phone--[484-614-3562] Contact Ext--[]
Best Time to Call--[0700-1500]

Prepared--[14-Mar-13] at [1253] by [MARY JO BAIER]

Remarks--
[]

AD 0 AD=L MERION T ATM0 ATM=AT&T ATLANTA DA 0 DA =COMCAST LWR MER
HS 0 HS =AQUA PA KE 0 KE =PECO MRTN LK0 LK=LEVEL 3 COMM
MI 0 MI =MCI PLL0 PLL=ZAYO BANDWIDTH Y1 0 Y1=VERIZON EASTERN

Serial Number--[20130731577]-[000]
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Serial Number Lookup

CDC: SERIAL NUMBER:

ALL 20130731577

Pennsylvania One Call System Response List

Responses for Serial Number: 20130731577 as of 8/23/2013 11:05 AM

CDC	MEMBER NAME	RESPONSE	RESPONSE DATE	INITIALS
KE	PECO ENERGY	MARKED	03/15/2013 10:01:29	CLS

CDC 00000 POCS MM/DD/YY TT:TT:TT 20131330232-000 NEW XCAV RTN

=====PENNSYLVANIA UNDERGROUND UTILITY LINE PROTECTION REQUEST=====

Serial Number--[20131330232]-[000] Channel#--[0752004][0711]

Message Type--[NEW][EXCAVATION][ROUTINE]

County--[MONTGOMERY] Municipality--[LOWER MERION TWP]

Work Site--[WENDOVER AVE]

Nearest Intersection--[MONTGOMERY AVE]

Second Intersection--[CURWEN RD]

Subdivision--[]

Site Marked in White--[Y]

Location Information--

[ROSEMONT COLLEGE WHICH HAS AN ADDRESS AT 1400 W MONTGOMERY AVE BRYNM/
19010. THE WORKSITE IS OFF OF WENDOVER AVE AT KAUL HALL THE SOFTBALL FIELD
AND THE ATHLETIC SOCCER FIELD.]

Caller Lat/Lon--[]

Mapped Type--[P] Mapped Lat/Lon--

[40.032675/-75.329905,40.032502/-75.327770,40.030925/-75.327652,

40.030843/-75.329036,40.032116/-75.330559]

Map Graphic--[http://www.pa1call.org/ViewMap/view.aspx?sn=20131330232]

Type of Work--[FIELD RECONSTRUCTION]

Depth--[12FT]

Extent of Excavation--[480FT X 440FT] Method of Excavation--[DIGGING]

Street--[] Sidewalk--[] Pub Prop--[] Pvt Prop--[X] Other--[]

Lawful Start Dates--[16-May-13] thru [28-May-13] Response Due Date--[15-May-13]

Scheduled Excavation Date--[16-May-13] Dig Time--[0800] Duration--[3 MONTHS]

Caller--[JOHN REINHART]

Caller Phone--[610-926-7070]

Caller Ext--[]

Excavator--[SCHLOUCH INC.]

Address--[132 EXCELSIOR DR]

City--[BLANDON]

State--[PA] Zip--[19510]

FAX--[610-926-7171]

Caller Type--[B]

Email--[jreinhardt@schlouch.com]

Work For--[ROSEMONT COLLEGE]

Person to Contact--[JOHN REINHART]

Contact Phone--[610-926-7070]

Contact Ext--[]

Best Time to Call--[]

Prepared--[13-May-13] at [0803] by [JAMISON BERNHART]

Remarks--

[MAP IS AVAILABLE BY REQUEST BY FAX OR EMAIL]

AD 0 AD =L MERION T ATM0 ATM=AT&T ATLANTA DA 0 DA =COMCAST LWR MER

HS 0 HS =AQUA PA KE 0 KE =PECO MRTN LKC0 LKC=LEVEL 3 COMM

MI 0 MI =MCI PLL0 PLL=ZAYO BANDWIDTH YI 0 YI =VERIZON EASTERN

Serial Number--[20131330232]-[000]

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Date Range Lookup	Serial Number Lookup	Municipal List Lookup	Pennsylvania Damages Database	Return to FOCS Links
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Serial Number Lookup

CDC: SERIAL NUMBER:

ALL 20131330232

Ticket Inquiry
Responses

PRINT	Export to Excel
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Pennsylvania One Call System Response List

Responses for Serial Number: 20131330232 as of 8/23/2013 11:11 AM

CDC	MEMBER NAME	RESPONSE	RESPONSE DATE	INITIALS
KE	PECO ENERGY	MARKED	05/16/2013 10:40:22	CLS.

CDC 00000 POCS MM/DD/YY TT:TT:TT 20131421231-000 NEW XCAV RTN

=====PENNSYLVANIA UNDERGROUND UTILITY LINE PROTECTION REQUEST=====

Serial Number--[20131421231]-[000] Channel#--[1104006][0533]

Message Type--[NEW][EXCAVATION][ROUTINE]

County--[MONTGOMERY] Municipality--[LOWER MERION TWP]

Work Site--[1400 MONTGOMERY AVE]

Nearest Intersection--[CURWEN RD]

Second Intersection--[WENDOVER AVE]

Subdivision--[]

Site Marked in White--[N]

Location Information--

[ROSEMONT COLLEGE AT CARDINAL HALL BTWN CURWEN RD AND WENDOVER AVE ON
SIDE OF MONTGOMERY AVE. SITE WILL BE MARKED IN WHITE.]

Caller Lat/Lon--[]

Mapped Type--[P] Mapped Lat/Lon--

[40.033290/-75.332018,40.033923/-75.330725,40.033017/-75.330146,

40.032227/-75.331696]

Map Graphic--[http://www.palcall.org/ViewMap/view.aspx?sn=20131421231]

Type of Work--[INSTL ELEC SVC & GENERATOR] Depth--[3FT]

Extent of Excavation--[180FT,150FT] Method of Excavation--[DIGGING]

Street--[] Sidewalk--[] Pub Prop--[] Pvt Prop--[X] Other--[]

Lawful Start Dates--[29-May-13] thru [06-Jun-13] Response Due Date--[28-May-13]

Scheduled Excavation Date--[29-May-13] Dig Time--[0700] Duration--[2 WEEKS]

Caller--[LARRY BISIGNANO]

Caller Phone--[267-644-9388] Caller Ext--[]

Excavator--[ROBERT FOSS ELECTRIC]

Address--[1074 BETHLEHEM PIKE]

City--[MONTGOMERYVILLE]

State--[PA] Zip--[18936]

FAX--[]

Caller Type--[B]

Email--[larryb@fossilc.com]

Work For--[DALE CORP]

Person to Contact--[LARRY BISIGNANO]

Contact Phone--[267-644-6063] Contact Ext--[]

Best Time to Call--[ANYTIME]

Prepared--[22-May-13] at [1113] by [VALERIE HENZE]

Remarks--

[]

AD 0 AD=L MERION T ATM0 ATM=AT&T ATLANTA DA 0 DA=COMCAST LWR MER

HS 0 HS=AQUA PA KE 0 KE=PECO MRTN LKC0 LKC=LEVEL 3 COMM

MI 0 MI=MCI PLL0 PLL=ZAYO BANDWIDTH YI 0 YI=VERIZON EASTERN

Serial Number--[20131421231]-[000]

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- [Date Range Lookup](#)
- [Serial Number Lookup](#)
- [Municipal List Lookup](#)
- [Pennsylvania Damages Database](#)
- [Return to POCs Links](#)

Serial Number Lookup

CDC: SERIAL NUMBER:

ALL

- Ticket Inquiry
- Responses

PRINT	Export to Excel			
Pennsylvania One Call System Response List				
Responses for Serial Number: 20131421231 as of 8/23/2013 11:08 AM				
CDC	MEMBER NAME	<u>RESPONSE</u>	<u>RESPONSE DATE</u>	INITIALS
KE	PECO ENERGY	MARKED	05/28/2013 13:20:26	CLS

CDC 00000 POCS MM/DD/YY TT:TT:TT 20131551660-000 UPDT XCAV RTN

=====PENNSYLVANIA UNDERGROUND UTILITY LINE PROTECTION REQUEST=====

Serial Number--[20131551660]-[000] Channel#--[1303057][0066]

Message Type--[UPDATE][EXCAVATION][ROUTINE]

County--[MONTGOMERY] Municipality--[LOWER MERION TWP]

Work Site--[WENDOVER AVE]

Nearest Intersection--[MONTGOMERY AVE]

Second Intersection--[CURWEN RD]

Subdivision--[]

Site Marked in White--[Y]

Location Information--

[ROSEMONT COLLEGE WHICH HAS AN ADDRESS AT 1400 W MONTGOMERY AVE BRYNM/
19010. THE WORKSITE IS OFF OF WENDOVER AVE AT KAUL HALL THE SOFTBALL FIELD
AND THE ATHLETIC SOCCER FIELD.]

Caller Lat/Lon--[]

Mapped Type--[P] Mapped Lat/Lon--

[40.032675/-75.329905,40.032502/-75.327770,40.030925/-75.327652,

40.030843/-75.329036,40.032116/-75.330559]

Map Graphic--[http://www.pa1call.org/ViewMap/view.aspx?sn=20131551660]

Type of Work--[FIELD RECONSTRUCTION]

Depth--[12FT]

Extent of Excavation--[480FT X 440FT] Method of Excavation--[DIGGING]

Street--[] Sidewalk--[] Pub Prop--[] Pvt Prop--[X] Other--[]

Lawful Start Dates--[07-Jun-13] thru [18-Jun-13] Response Due Date--[06-Jun-13]

Scheduled Excavation Date--[07-Jun-13] Dig Time--[0800] Duration--[3 MONTHS]

Caller--[JOHN REINHART]

Caller Phone--[610-926-7070]

Caller Ext--[]

Excavator--[SCHLOUCH INC.]

Address--[132 EXCELSIOR DR]

City--[BLANDON]

State--[PA] Zip--[19510]

FAX--[610-926-7171]

Caller Type--[B]

Email--[jreinhardt@schlouch.com]

Work For--[ROSEMONT COLLEGE]

Person to Contact--[JOHN REINHART]

Contact Phone--[610-926-7070]

Contact Ext--[]

Best Time to Call--[]

Prepared--[04-Jun-13] at [1304] by [KAY STEFFEN]

Remarks--

[MAP IS AVAILABLE BY REQUEST BY FAX OR EMAIL

*****== UPDATE 20131330232-000 --6/4/2013 1304 KAS 57==*****

UPDATE REQUESTED BY: TROY BAUERS

REASON FOR UPDATE: WORK IN PROGRESS

REMARK LINES.]

AD 0 AD=L MERION T ATM0 ATM=AT&T ATLANTA DA 0 DA=COMCAST LWR MER

HS 0 HS=AQUA PA KE 0 KE=PECO MRTN LKC0 LKC=LEVEL 3 COMM

MI 0 MI=MCI PLL0 PLL=ZAYO BANDWIDTH YI 0 YI=VERIZON EASTERN

Serial Number--[20131551660]-[000]

Date Range Lookup	Serial Number Lookup	Municipal List Lookup	Pennsylvania Damages Database	Return to POCs Links
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Serial Number Lookup

CDC: SERIAL NUMBER:

ALL 20131551660

Ticket Inquirv
Responses

PRINT	Export to Excel
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Pennsylvania One Call System Response List

Responses for Serial Number: 20131551660 as of 8/23/2013 11:13 AM

CDC	MEMBER NAME	RESPONSE	RESPONSE DATE	INITIALS
KE	PECO ENERGY	MARKED	06/06/2013 14:20:44	CLS

CDC 00000 POCS MM/DD/YY TT:TT:TT 20131790696-000 NEW XCAV RTN

=====PENNSYLVANIA UNDERGROUND UTILITY LINE PROTECTION REQUEST=====

Serial Number--[20131790696]-[000] Channel#--[1000014][0144]

Message Type--[NEW][EXCAVATION][ROUTINE]

County--[MONTGOMERY] Municipality--[LOWER MERION TWP]

Work Site--[WENDOVER AVE]

Nearest Intersection--[MONTGOMERY AVE]

Second Intersection--[CURWEN RD]

Subdivision--[]

Site Marked in White--[Y]

Location Information--

[ROSEMONT COLLEGE WHICH HAS AN ADDRESS AT 1400 W MONTGOMERY AVE BRYNM/
19010. THE WORKSITE IS OFF OF WENDOVER AVE AT KAUL HALL THE SOFTBALL FIELD
AND THE ATHLETIC SOCCER FIELD.]

Caller Lat/Lon--[]

Mapped Type--[P] Mapped Lat/Lon--

[40.032675/-75.329905,40.032502/-75.327770,40.030925/-75.327652,

40.030843/-75.329036,40.032116/-75.330559]

Map Graphic--[http://www.pa1call.org/ViewMap/view.aspx?sn=20131790696]

Type of Work--[FIELD RECONSTRUCTION]

Depth--[12FT]

Extent of Excavation--[480FT X 440FT] Method of Excavation--[DIGGING]

Street--[] Sidewalk--[] Pub Prop--[] Pvt Prop--[X] Other--[]

Lawful Start Dates--[03-Jul-13] thru [15-Jul-13] Response Due Date--[02-Jul-13]

Scheduled Excavation Date--[03-Jul-13] Dig Time--[0630] Duration--[3 MONTHS]

Caller--[TROY BOWERS]

Caller Phone--[610-926-7070]

Caller Ext--[]

Excavator--[SCHLOUCH EXCAVATING COMPANY]

Address--[PO BOX 69 EXCELSIOR INDUSTRIAL PARK]

City--[BLANDON]

State--[PA] Zip--[19510]

FAX--[610-926-7171]

Caller Type--[B]

Email--[tbowers@schlouch.com]

Work For--[ROSEMONT COLLEGE]

Person to Contact--[TROY BOWERS]

Contact Phone--[610-960-6514]

Contact Ext--[]

Best Time to Call--[ANYTIME]

Prepared--[28-Jun-13] at [1003] by [LORYNDA POLJAK]

Remarks--

[MAP IS AVAILABLE BY REQUEST BY FAX OR EMAIL
REF 20131330232, WORK IN PROGRESS, PLEASE REMARK.]

AD 0 AD=L MERION T ATMO ATM=AT&T ATLANTA DA 0 DA=COMCAST LWR MER

HS 0 HS=AQUA PA KE 0 KE=PECO MRTN LKC 0 LKC=LEVEL 3 COMM

MI 0 MI=MCI PLL 0 PLL=ZAYO BANDWIDTH YI 0 YI=VERIZON EASTERN

Serial Number--[20131790696]-[000]

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Date Range Lookup	Serial Number Lookup	Municipal List Lookup	Pennsylvania Damages Database	Return to POCSS Links
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Serial Number Lookup

CDC: SERIAL NUMBER:

ALL 20131790696

Ticket Inquiry
Responses

PRINT	Export to Excel			
Pennsylvania One Call System Response List				
Responses for Serial Number: 20131790696 as of 8/23/2013 11:16 AM				
CDC	MEMBER NAME	RESPONSE	RESPONSE DATE	INITIALS
KE	PECO ENERGY	MARKED	07/03/2013 11:19:51	CLS

CDC 00000 POCS MM/DD/YY TT:TT:TT 20131840770-000 NEW XCAV RTN

=====PENNSYLVANIA UNDERGROUND UTILITY LINE PROTECTION REQUEST=====

Serial Number--[20131840770]-[000] Channel#--[0916003][0219]

Message Type--[NEW][EXCAVATION][ROUTINE]

County--[MONTGOMERY] Municipality--[LOWER MERION TWP]

Work Site--[1400 MONTGOMERY AVE]

Nearest Intersection--[CURWEN RD]

Second Intersection--[WENDOVER AVE]

Subdivision--[]

Site Marked in White--[Y]

Location Information--

[WORKING AT ROSEMONT COLLEGE AT KISTLER LIBRARY AND KAUL HALL BTWN CURWEN RD AND WENDOVER AVE ON THE W SIDE OF MONTGOMERY AVE. SITES ARE IN THE BACK OF THE CAMPUS BY A SPORTS FIELD.]

Caller Lat/Lon--[]

Mapped Type--[P] Mapped Lat/Lon--

[40.033677/-75.329819,40.032700/-75.331793,40.029709/-75.328306,

40.030531/-75.327308,40.032683/-75.327694]

Map Graphic--[http://www.palcall.org/ViewMap/view.aspx?sn=20131840770]

Type of Work--[INSTL ELEC SVC & GENERATOR] Depth--[3FT]

Extent of Excavation--[400FT] Method of Excavation--[DIGGING]

Street--[] Sidewalk--[] Pub Prop--[] Pvt Prop--[X] Other--[]

Lawful Start Dates--[09-Jul-13] thru [18-Jul-13] Response Due Date--[08-Jul-13]

Scheduled Excavation Date--[09-Jul-13] Dig Time--[0700] Duration--[2 WEEKS]

Caller--[LARRY BISIGNANO]

Caller Phone--[267-644-9388] Caller Ext--[]

Excavator--[ROBERT FOSS ELECTRIC]

Address--[1074 BETHLEHEM PIKE]

City--[MONTGOMERYVILLE]

State--[PA] Zip--[18936]

FAX--[]

Caller Type--[B]

Email--[larryb@fossilc.com]

Work For--[DALE CORP]

Person to Contact--[LARRY BISIGNANO]

Contact Phone--[267-644-6063] Contact Ext--[]

Best Time to Call--[ANYTIME]

Prepared--[03-Jul-13] at [0919] by [COURTNEY FIELD]

Remarks--

[]

AD 0 AD=L MERION T ATM0 ATM=AT&T ATLANTA DA 0 DA=COMCAST LWR MER

HS 0 HS=AQUA PA KE 0 KE=PECO MRTN LKC0 LKC=LEVEL 3 COMM

MI 0 MI=MCI PLL0 PLL=ZAYO BANDWIDTH Y1 0 YI=VERIZON EASTERN

Serial Number--[20131840770]-[000]

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Serial Number Lookup

CDC: SERIAL NUMBER:

ALL 20131840770

Pennsylvania One Call System Response List

Responses for Serial Number: 20131840770 as of 8/23/2013 11:18 AM

CDC	MEMBER NAME	RESPONSE	RESPONSE DATE	INITIALS
KE	PECO ENERGY	MARKED	07/08/2013 09:40:22	CLS

CDC 00000 POCS MM/DD/YY TT:TT:TT 20131930871-000 NEW XCAV INSF

=====PENNSYLVANIA UNDERGROUND UTILITY LINE PROTECTION REQUEST=====

Serial Number--[20131930871]-[000] Channel#--[0951009][0707]

Message Type--[NEW][EXCAVATION][INSUFFICIENT]

County--[MONTGOMERY] Municipality--[LOWER MERION TWP]

Work Site--[WENDOVER AVE]

Nearest Intersection--[MONTGOMERY AVE]

Second Intersection--[CURWEN RD]

Subdivision--[]

Site Marked in White--[N]

Location Information--

[WORKING AT ROSEMONT COLLEGE. WORKING IN FRONT OF KAUL HALL IN THE SOCCEI FIELD.]

Caller Lat/Lon--[]

Mapped Type--[P] Mapped Lat/Lon--

[40.032478/-75.329615,40.030728/-75.329540,40.030671/-75.327576,
40.032593/-75.327802]

Map Graphic--[http://www.pa1call.org/ViewMap/view.aspx?sn=20131930871]

Type of Work--[INSTL FOOTINGS] Depth--[3-6FT]

Extent of Excavation--[] Method of Excavation--[DIGGING]

Street--[] Sidewalk--[] Pub Prop--[] Pvt Prop--[X] Other--[]

Lawful Start Dates--[17-Jul-13] thru [26-Jul-13] Response Due Date--[16-Jul-13]

Scheduled Excavation Date--[15-Jul-13] Dig Time--[0700] Duration--[1 MONTH]

Caller--[SHARON DIETLE]

Caller Phone--[610-356-2966] Caller Ext--[]

Excavator--[CAVAN CONSTRUCTION CO INC]

Address--[274 BODLEY RD]

City--[ASTON]

State--[PA] Zip--[19014]

FAX--[484-785-1010] Caller Type--[B]

Email--[smdietle@cavanconstruction.com]

Work For--[DALE CORPORATION]

Person to Contact--[TOM SMITH]

Contact Phone--[610-633-1662] Contact Ext--[]

Best Time to Call--[0700-1700]

Prepared--[12-Jul-13] at [1003] by [BRIAN MCGUIGAN]

Remarks--

[]

AD 0 AD=L MERION T ATM0 ATM=AT&T ATLANTA DA 0 DA =COMCAST LWR MER

HS 0 HS =AQUA PA KE 0 KE =PECO MRTN LKC0 LKC=LEVEL 3 COMM

MI 0 MI =MCI PLL0 PLL=ZAYO BANDWIDTH YI 0 YI =VERIZON EASTERN

Serial Number--[20131930871]-[000]

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Date Range Lookup	Serial Number Lookup	Municipal List Lookup	Pennsylvania Damages Database	Return to POCS Links
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Serial Number Lookup

CDC: SERIAL NUMBER:

ALL 20131930871

Ticket Inquiry
Responses

PRINT	Export to Excel			
Pennsylvania One Call System Response List				
Responses for Serial Number: 20131930871 as of 8/23/2013 11:19 AM				
CDC	MEMBER NAME	RESPONSE	RESPONSE DATE	INITIALS
KE	PECO ENERGY	MARKED	07/15/2013 11:29:39	CLS

CDC 00000 POCS MM/DD/YY TT:TT:TT 20131970626-000 NEW XCAV INSF

=====PENNSYLVANIA UNDERGROUND UTILITY LINE PROTECTION REQUEST=====

Serial Number--[20131970626]-[000] Channel#--[0913017][0237]
Message Type--[NEW][EXCAVATION][INSUFFICIENT]

County--[MONTGOMERY] Municipality--[LOWER MERION TWP]

Work Site--[WENDOVER AVE]

Nearest Intersection--[MONTGOMERY AVE]

Second Intersection--[CURWEN RD]

Subdivision--[]

Site Marked in White--[N]

Location Information--

[WORKING AT ROSEMONT COLLEGE. WORKING RIGHT OF SOCCER FIELD, IF LOOKING AT THE FRONT OF KAUL HALL]

Caller Lat/Lon--[]

Mapped Type--[P] Mapped Lat/Lon--

[40.030711/-75.327448,40.030722/-75.328821,40.032140/-75.330108,
40.033151/-75.329068,40.032663/-75.327635]

Map Graphic--[http://www.palcall.org/ViewMap/view.aspx?sn=20131970626]

Type of Work--[INSTL FOOTINGS]

Depth--[3-6FT]

Extent of Excavation--[]

Method of Excavation--[DIGGING]

Street--[] Sidewalk--[] Pub Prop--[] Pvt Prop--[X] Other--[]

Lawful Start Dates--[19-Jul-13] thru [30-Jul-13] Response Due Date--[18-Jul-13]

Scheduled Excavation Date--[17-Jul-13] Dig Time--[0700] Duration--[1 MONTH]

Caller--[SHARON DIETLE]

Caller Phone--[610-356-2966]

Caller Ext--[]

Excavator--[CAVAN CONSTRUCTION CO INC]

Address--[274 BODLEY RD]

City--[ASTON]

State--[PA] Zip--[19014]

FAX--[484-785-1010]

Caller Type--[B]

Email--[smdietle@cavanconstruction.com]

Work For--[DALE CORPORATION]

Person to Contact--[TOM SMITH]

Contact Phone--[610-633-1662]

Contact Ext--[]

Best Time to Call--[0700-1700]

Prepared--[16-Jul-13] at [0917] by [STACY SURMICK]

Remarks--

[]

AD 0 AD =L MERION T ATM0 ATM=AT&T ATLANTA DA 0 DA =COMCAST LWR MER

HS 0 HS =AQUA PA KE 0 KE =PECO MRTN LKC0 LKC=LEVEL 3 COMM

MI 0 MI =MCI PLL0 PLL=ZAYO BANDWIDTH YI 0 YI =VERIZON EASTERN

Serial Number--[20131970626]-[000]

===== Copyright (c) 2013 by Pennsylvania One Call System, Inc. =====

Date Range Lookup	Serial Number Lookup	Municipal List Lookup	Pennsylvania Damages Database	Return to POCs Links
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Serial Number Lookup

CDC: SERIAL NUMBER:

ALL  20131970626

Ticket Inquiry
Responses

PRINT	Export to Excel
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Pennsylvania One Call System Response List

Responses for Serial Number: 20131970626 as of 8/23/2013 11:21 AM

CDC	MEMBER NAME	RESPONSE	RESPONSE DATE	INITIALS
KE	PECO ENERGY	MARKED	07/16/2013 13:03:56.	CLS

CDC 00000 POCS MM/DD/YY TT:TT:TT 20132192985-000 NEW XCAV EMER

=====PENNSYLVANIA UNDERGROUND UTILITY LINE PROTECTION REQUEST=====

Serial Number--[20132192985]-[000] Channel#--[1649025][0180]

Message Type--[NEW][EXCAVATION][EMERGENCY]

County--[MONTGOMERY] Municipality--[LOWER MERION TWP]

Work Site--[W MONTGOMERY AVE]

Nearest Intersection--[WENDOVER RD]

Second Intersection--[]

Subdivision--[]

Site Marked in White--[N]

Location Information--

[WORKING AT THE NEW CONSTRUCTION SITE AT ROSEMONT COLLEGE, ADDRESSED AS 1400 W MONTGOMERY AVE. THERE IS AN UG GAS FIRE WITH VEHICLES ON FIRE.]

Caller Lat/Lon--[]

Mapped Type--[P] Mapped Lat/Lon--

[40.036043/-75.328660,40.034433/-75.332479,40.030671/-75.329926, 40.032330/-75.325828]

Map Graphic--[http://www.palcall.org/ViewMap/view.aspx?sn=20132192985]

Type of Work--[REPAIR GAS LEAK] Depth--[3FT]

Extent of Excavation--[] Method of Excavation--[DIGGING]

Street--[X] Sidewalk--[X] Pub Prop--[X] Pvt Prop--[X] Other--[]

Lawful Start Dates--[] thru [] Response Due Date--[07-Aug-13]

Scheduled Excavation Date--[07-Aug-13] Dig Time--[1700] Duration--[]

Caller--[FRANK DONNELLY]

Caller Phone--[610-941-1600]

Caller Ext--[]

Excavator--[PECO ENERGY]

Address--[680 RIDGE PIKE]

City--[PLYMOUTH MEETING]

State--[PA] Zip--[19462-1945]

FAX--[610-941-1315]

Caller Type--[B]

Email--[]

Work For--[PECO]

Person to Contact--[ANYONE]

Contact Phone--[610-941-1600]

Contact Ext--[]

Best Time to Call--[ANYTIME]

Prepared--[07-Aug-13] at [1652] by [DIANE AUL]

Remarks--

[]

AD 0 AD=L MERION T ATM0 ATM=AT&T ATLANTA DA 0 DA=COMCAST LWR MER

HS 0 HS=AQUA PA HT40 HT4=AQUA PA INC AHR KE 0 KE=PECO MRTN

LKC0 LKC=LEVEL 3 COMM MI 0 MI=MCI PLL0 PLL=ZAYO BANDWIDTH

YI 0 YI=VERIZON EASTERN

Serial Number--[20132192985]-[000]

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- Date Range Lookup
- Serial Number Lookup
- Municipal List Lookup
- Pennsylvania Damages Database
- Return to POCs Links

Serial Number Lookup

CDC: SERIAL NUMBER:

ALL

20132192985

Ticket Inquiry
Responses

PRINT	Export to Excel			
Pennsylvania One Call System Response List				
Responses for Serial Number: 20132192985 as of 8/23/2013 11:26 AM				
CDC	MEMBER NAME	RESPONSE	RESPONSE DATE	INITIALS
KE	PECO ENERGY	MARKED	08/07/2013 18:38:46	CLS

CDC 00000 POCS MM/DD/YY TT:TT:TT 20132200770-000 UPDT XCAV RTN

=====PENNSYLVANIA UNDERGROUND UTILITY LINE PROTECTION REQUEST=====

Serial Number--[20132200770]-[000] Channel#--[0944014][0067]

Message Type--[UPDATE][EXCAVATION][ROUTINE]

County--[MONTGOMERY] Municipality--[LOWER MERION TWP]

Work Site--[WENDOVER AVE]

Nearest Intersection--[MONTGOMERY AVE]

Second Intersection--[CURWEN RD]

Subdivision--[] Site Marked in White--[Y]

Location Information--

[ROSEMONT COLLEGE WHICH HAS AN ADDRESS AT 1400 W MONTGOMERY AVE BRYNM,
19010. THE WORKSITE IS OFF OF WENDOVER AVE AT KAUL HALL THE SOFTBALL FIELD
AND THE ATHLETIC SOCCER FIELD.]

Caller Lat/Lon--[]

Mapped Type--[P] Mapped Lat/Lon--

[40.032675/-75.329905,40.032502/-75.327770,40.030925/-75.327652,

40.030843/-75.329036,40.032116/-75.330559]

Map Graphic--[http://www.pa1call.org/ViewMap/view.aspx?sn=20132200770]

Type of Work--[FIELD RECONSTRUCTION] Depth--[12FT]

Extent of Excavation--[480FT X 440FT] Method of Excavation--[DIGGING]

Street--[] Sidewalk--[] Pub Prop--[] Pvt Prop--[X] Other--[]

Lawful Start Dates--[13-Aug-13] thru [22-Aug-13] Response Due Date--[12-Aug-13]

Scheduled Excavation Date--[13-Aug-13] Dig Time--[0630] Duration--[3 MONTHS]

Caller--[TROY BOWERS]

Caller Phone--[610-926-7070] Caller Ext--[]

Excavator--[SCHLOUCH EXCAVATING COMPANY]

Address--[PO BOX 69 EXCELSIOR INDUSTRIAL PARK]

City--[BLANDON] State--[PA] Zip--[19510]

FAX--[610-926-7171] Caller Type--[B]

Email--[tbowers@schlouch.com]

Work For--[ROSEMONT COLLEGE]

Person to Contact--[TROY BOWERS]

Contact Phone--[610-960-6514] Contact Ext--[]

Best Time to Call--[ANYTIME]

Prepared--[08-Aug-13] at [0945] by [LORYNDA POLJAK]

Remarks--

[MAP IS AVAILABLE BY REQUEST BY FAX OR EMAIL
REF 20131330232, WORK IN PROGRESS, PLEASE REMARK.
*****== UPDATE 20131790696-000 --8/8/2013 0945 LLP 14==*****
UPDATE REQUESTED BY: TROY BOWERS
REASON FOR UPDATE: WORK IN PROGRESS
REMARK LINES.]

AD 0 AD =L MERION T ATMO ATM=AT&T ATLANTA DA 0 DA =COMCAST LWR MER
HS 0 HS =AQUA PA KE 0 KE =PECO MRTN LKC 0 LKC=LEVEL 3 COMM
MI 0 MI =MCI PLL 0 PLL=ZAYO BANDWIDTH YI 0 YI =VERIZON EASTERN

Serial Number Lookup

CDC: SERIAL NUMBER:

ALL 20132200770

Ticket Inquiry
Responses

Pennsylvania One Call System Response List

Responses for Serial Number: 20132200770 as of 8/23/2013 11:29 AM

CDC	MEMBER NAME	RESPONSE	RESPONSE DATE	INITIALS
KE	PECO ENERGY	CLEAR - NO FACILITIES	08/12/2013 10:19:30	CLS

CDC 00000 PCS MM/DD/YY TT:TT:TT 20132200925-002 RNOT XCAV EMER

=====PENNSYLVANIA UNDERGROUND UTILITY LINE PROTECTION REQUEST=====

Serial Number--[20132200925]-[002] Channel#--[0922050][0127]

Message Type--[RENOTIFY][EXCAVATION][EMERGENCY]

County--[MONTGOMERY] Municipality--[LOWER MERION TWP]

Work Site--[1400 W MONTGOMERY AVE]

Nearest Intersection--[WENDOVER AVE]

Second Intersection--[]

Subdivision--[]

Site Marked in White--[N]

Location Information--

[WORKING AT THE NEWLY EXCAVATED SOCCER & SOFTBALL FIELDS LOCATED ON THE W SIDE OF WENDOVER AVE APPX .14 MILES SW OF W MONTGOMERY AVE]

Caller Lat/Lon--[]

Mapped Type--[P] Mapped Lat/Lon--

[40.032190/-75.327727,40.031147/-75.327641,40.030482/-75.328939,

40.031402/-75.330130,40.032527/-75.329765]

Map Graphic--[<http://www.pa1call.org/ViewMap/view.aspx?sn=20132200925>]

Type of Work--[DRILLING POST HOLES] Depth--[22FT]

Extent of Excavation--[36IN DIA] Method of Excavation--[DRILLING]

Street--[] Sidewalk--[] Pub Prop--[] Pvt Prop--[X] Other--[]

Lawful Start Dates--[] thru [] Response Due Date--[16-Aug-13]

Scheduled Excavation Date--[08-Aug-13] Dig Time--[1015] Duration--[2-3 WEEKS]

Caller--[DAN SOLEAU]

Caller Phone--[267-644-9388] Caller Ext--[]

Excavator--[ROBERT FOSS ELECTRIC]

Address--[1074 BETHLEHEM PIKE]

City--[MONTGOMERYVILLE]

State--[PA] Zip--[18936]

FAX--[]

Caller Type--[B]

Email--[dan@fossilc.com]

Work For--[DALE CORPORATION]

Person to Contact--[DAN SOLEAU]

Contact Phone--[215-290-0888] Contact Ext--[]

Best Time to Call--[ANYTIME]

Job Number--[ROSEMONT COLLEG]

Prepared--[16-Aug-13] at [0924] by [LAURA STANLEY]

Remarks--

[CREW ON SITE.

****-- RENOTIFY 20132200925-002 --8/16/2013 0924 LNS 50--****

RENOTIFY REQUESTED BY: DAN SOLEAU

ATTN PECO YOU HAVE RESPONDED AS MARKED. CALLER STATES THERE IS A NEW LINE AT THE SITE THAT IS NOT MARKED AND THE ELECTRIC MARKINGS NEED REFRESHED. PLEASE RESPOND ASAP TO MARK LINES. CALLER IS ON SITE AND WOULD LIKE YOU TO CONTACT HIM WHEN YOU ARRIVE. HE CAN BE REACHED AT 215-290-0888.]

KE 0 KE =PECO MRTN

Serial Number--[20132200925]-[002]

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Date Range Lookup	Serial Number Lookup	Municipal List Lookup	Pennsylvania Damages Database	Return to POCs Links
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Serial Number Lookup

CDC: SERIAL NUMBER:

ALL 20132200925

Ticket Inquiry
Responses

PRINT	Export to Excel
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Pennsylvania One Call System Response List

Responses for Serial Number: 20132200925 as of 8/23/2013 11:23 AM

CDC	MEMBER NAME	RESPONSE	RESPONSE DATE	INITIALS
KE	PECO ENERGY	NOT MARKED - DUE TO NO ACCESS	08/16/2013 10:19:24	CLS

EXHIBIT E

RECEIVED

JAN 8 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

RECEIVED

JAN 8 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Inspection Complete

Job Site
Visited by
Inspector

Rosemont College

Preconstruction
Meeting

Remarks History

[x] Close

Jul 30 2013 7:02AM

Grade was raised above main i previously installed marker balls at main ldug and installed 2 marker balls 2' below grade today

Jul 29 2013 8:55AM

Dug test hole on 4" plastic at sidewalk of wendover Rd gated entrance , located and painted , will ddif later

Jul 11 2013 9:35AM

Starting getting measurments for ddif. To much constuction , need to stop back

Jul 9 2013 1:14PM

Located 4" plastic in 5 locations installed 5 marker balls and 4 gas marker posts

Jul 8 2013 9:55AM

Please see old notes , i added flags Contractor is supposed to dig test holes but said he could not again today

Job Site
Visited by
Inspector

Rosemont College

Preconstruction
Meeting

Remarks History

Close

Jul 9 2013 1:14PM

Located 4" plastic in 5 locations installed 6 marker balls and 4 gas marker posts

Jul 8 2013 9:55AM

Please see old notes, I added flags Contractor is supposed to dig test holes but said he could not again today

Jul 5 2013 12:44PM

Contractor was supposed to dig test holes ove 4" plastic but pushed back to next week I located service to Library as best I could by connecting to riser

Jul 3 2013 11:28AM

Measurments on 4" plastic main are off roadway which has been removed Locator and I did best we could to mark 4" plastic. Met with contractor to go over markings I asked him to dig test holes to verify main location

EXHIBIT F

RECEIVED

JAN 8 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

RECEIVED

Copy

JAN 8 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

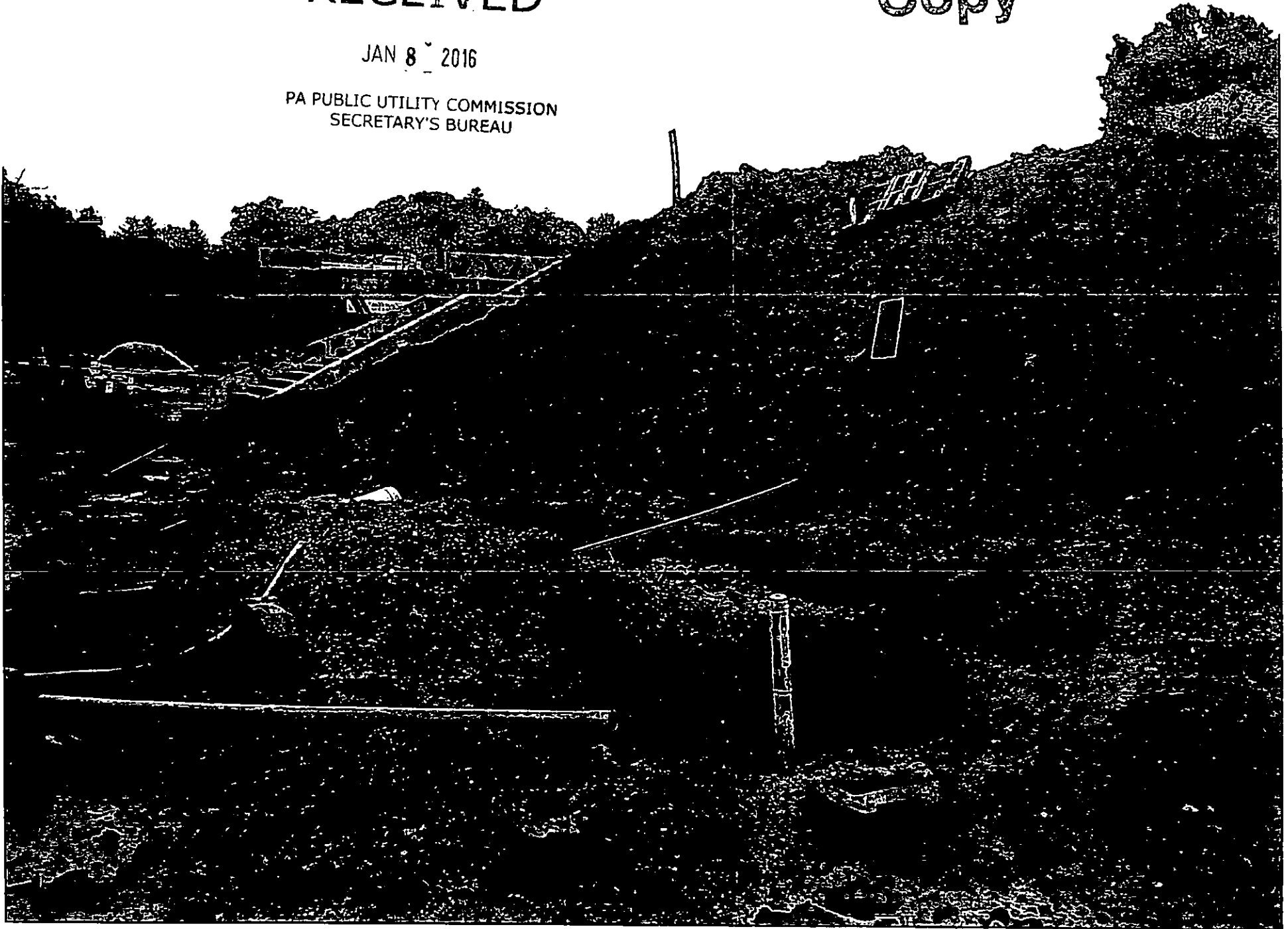






EXHIBIT G

RECEIVED

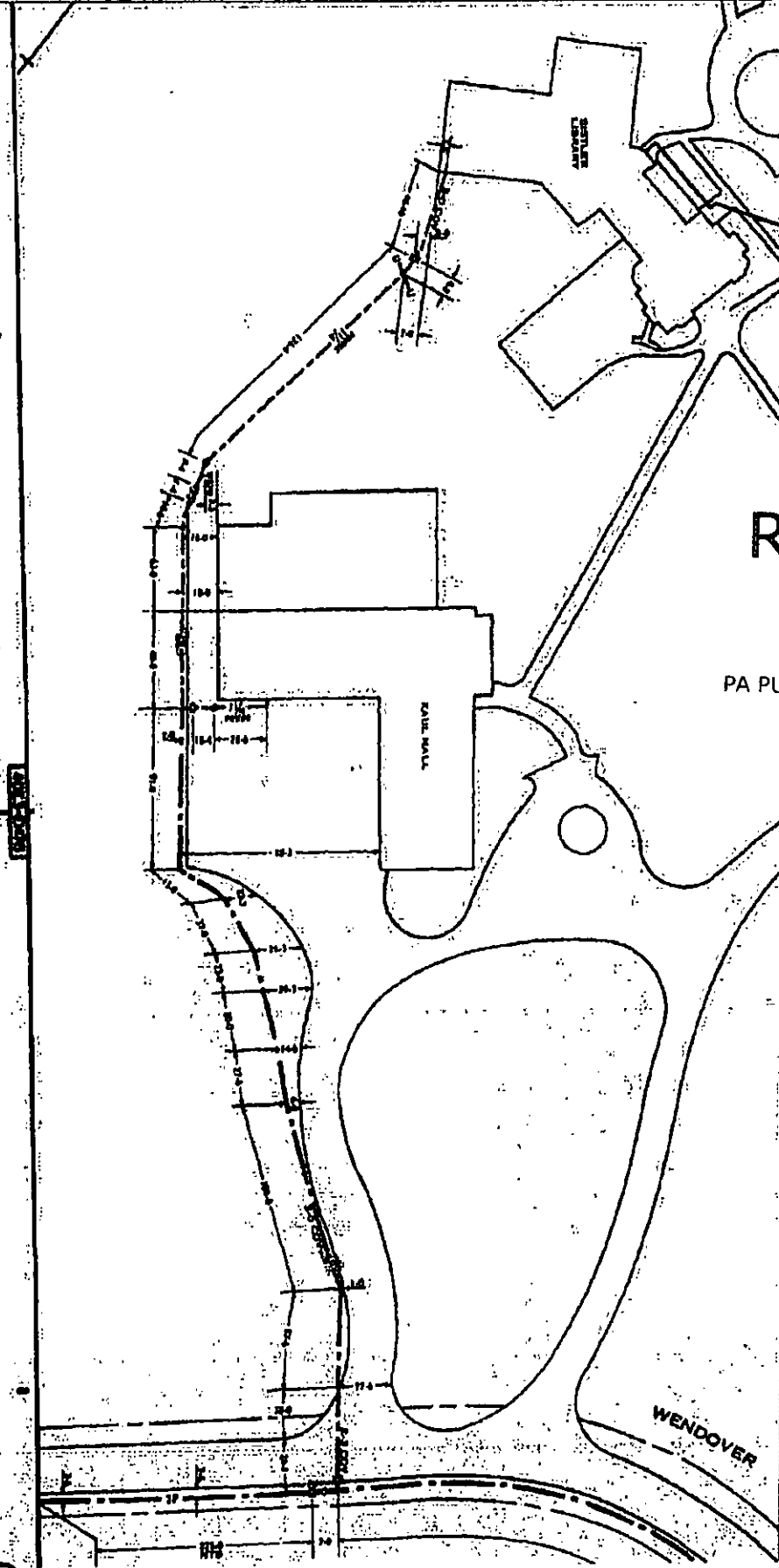
JAN 8 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

PECO Map of Rosemont College Before the August 7, 2013 Incident

h:\gasmaps\4014065ad78.dgn 8/20/2013 5:17:17 PM

PECO ENERGY COMPANY



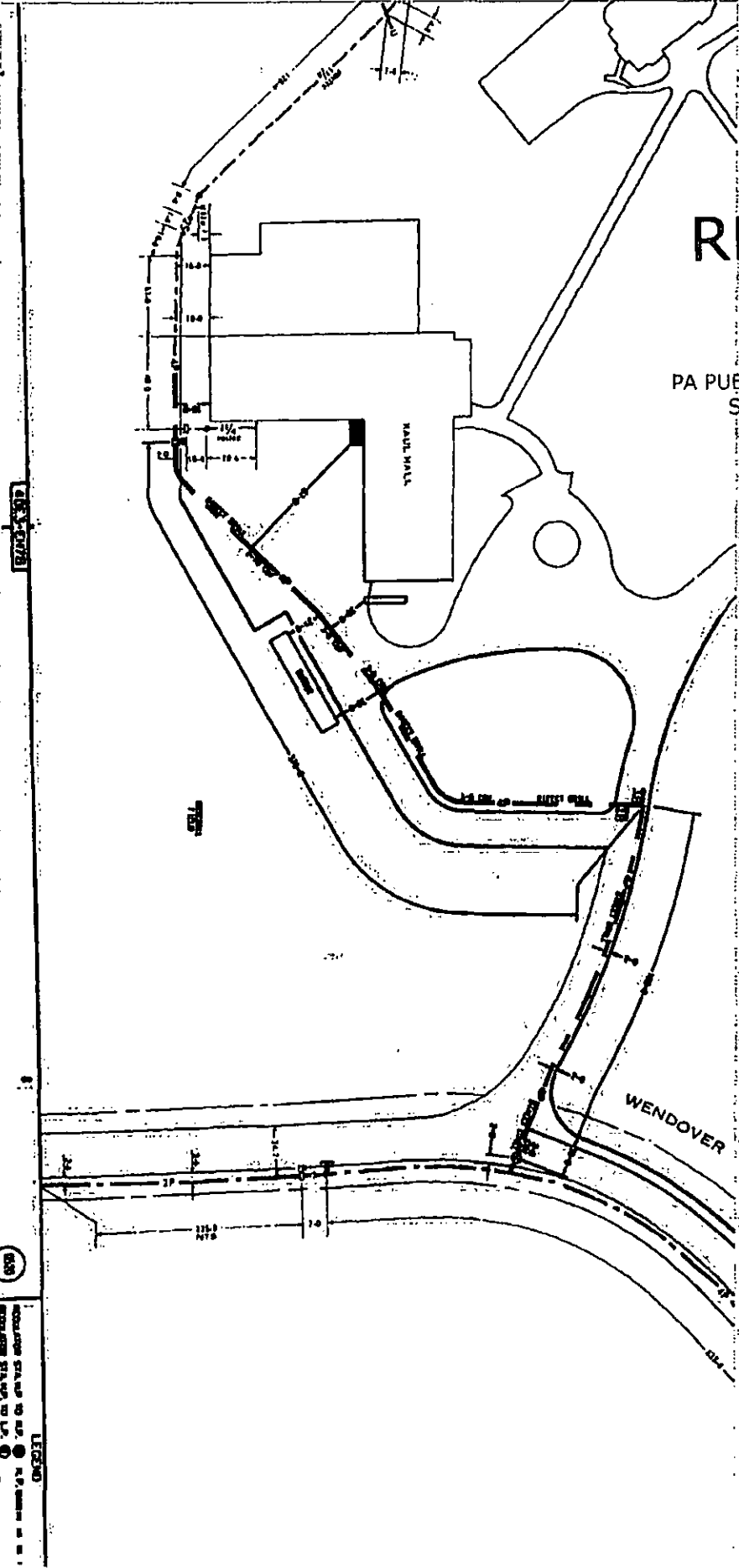
RECEIVED

JAN 8 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

PECO Map of Rosemont College After the August 7, 2013 Incident

h:\gasmaps\40\40e5ad78.dgn 1/5/2016 9:03:16 AM



RECEIVED

JAN 8 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

639

LEGEND
SOLID LINE TO BE...
DASHED LINE TO BE...
DOTTED LINE TO BE...
SYMBOL TO BE...
SYMBOL TO BE...

EXHIBIT H

RECEIVED

JAN 8 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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JAN 8 2016



LexisNexis®

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAUEXCAVATION TECHNOLOGIES, INC., Appellant v. COLUMBIA GAS
COMPANY OF PENNSYLVANIA, Appellee

No. 32 WAP 2008

SUPREME COURT OF PENNSYLVANIA

604 Pa. 50; 985 A.2d 840; 2009 Pa. LEXIS 2794

September 9, 2008, Argued
December 29, 2009, Decided**PRIOR HISTORY:** [***1]

Appeal from the Order of the Superior Court entered November 7, 2007 at No. 1237 WDA 2005, affirming the Order of the Court of Common Pleas of Washington County entered June 29, 2005 at No. 2004-5279.

Excavation Techs. v. Columbia Gas Co., 2007 PA Super 327, 936 A.2d 111, 2007 Pa. Super. LEXIS 3845 (Pa. Super. Ct., 2007)

COUNSEL: For Excavation Technologies, Inc., APPELLANT: Philip L. Clark, Jr., Esq., Balph, Nicolls, Mitsos, Flannery & Clark, P.C.; Allan L. Fluke, Esq., Thorp Reed & Armstrong, L.L.P..

For Pennsylvania Utility Contractors Association, et al., APPELLANT AMICUS CURIAE: Kevin John McKeon, Esq., Watt, Tieder, Hoffar & Fitzgerald, L.L.P..

For Columbia Gas company of Pennsylvania, APPELLEE: James C. Warnbrodt, Esq., Welman, Weinberg & Reis, Co., L.P.A.; Walter Thomas McGough, Jr., Esq., Reed Smith, L.L.P..

For Energy Association of Pennsylvania, APPELLEE AMICUS CURIAE: Donna M. J. Clark, Esq., Energy Association of Pennsylvania.

JUDGES: MR. JUSTICE EAKIN, CASTILLE, C.J., SAYLOR, EAKIN, BAER, TODD, McCAFFERY, GREENSPAN, JJ. Madame Justice Todd did not

participate in the consideration or decision of this case. Mr. Chief Justice Castille, Messrs. Justice Baer and McCaffery and Madame Justice Greenspan join the opinion. Mr. Justice Saylor files a concurring opinion.

OPINION BY: EAKIN**OPINION**

[*52] [**841] MR. JUSTICE EAKIN

Before performing excavation work for a waterline extension project, appellant requested appellee mark the locations of gas lines around the work sites pursuant to the One Call Act (Act).¹ Appellee improperly marked some lines and failed to mark others. As a result, appellant struck various gas lines, which hampered its work, resulting in economic damages of \$ 74,502.06; appellant did not any sustain physical injury or property damage.

¹ Act of December 10, 1974, P.L. 852, as amended, 73 P.S. § 177(5)(i) (requiring facility owner mark position of underground lines upon request).

Appellant sued appellee on a theory of negligent misrepresentation [***2] under § 552 of the Restatement (Second) of Torts,² claiming appellee failed to comply with its statutory duties under the Act. Appellee filed preliminary objections in the nature of a demurrer,

arguing the economic loss doctrine precluded liability.³ The trial court sustained the objections; [*53] appellant appealed.

2 Section 552, titled "Information Negligently Supplied for the Guidance of Others," provides:

(1) One who, in the course of his business, profession or employment, or in any other transaction in which he has a pecuniary interest, supplies false information for the guidance of others in their business transactions, is subject to liability for pecuniary loss caused to them by their justifiable reliance upon the information, if he fails to exercise reasonable care or competence in obtaining or communicating the information.

(2) Except as stated in Subsection (3), the liability stated in Subsection (1) is limited to loss suffered

(a) by the person or one of a limited group of persons for whose benefit and guidance he intends to supply the information or knows that the recipient intends to supply it; and

(b) through reliance upon it in a transaction that he intends the information to [***3] influence or knows that the recipient so intends or in a substantially similar transaction.

(3) The liability of one who is

under a public duty to give the information extends to loss suffered by any of the class of persons for whose benefit the duty is created, in any of the transactions in which it is intended to protect them.

Restatement (Second) of Torts § 552 (1977).

3 The economic loss doctrine provides, "no cause of action exists for negligence that results solely in economic damages unaccompanied by physical injury or property damage." *Adams v. Copper Beach Townhomes Communities, L.P.*, 2003 PA Super 30, 816 A.2d 301, 305 (Pa. Super. 2003).

The Superior Court affirmed, recognizing the economic loss doctrine generally precludes recovery in negligence actions for injuries which are solely economic. The court noted an exception for claims of negligent misrepresentation under § 552, which allows such claims to evade dismissal even if they assert purely economic losses. *Excavation Technologies, Inc. v. Columbia* [**842] *Gas Company of Pennsylvania*, 2007 PA Super 327, 936 A.2d 111, 115-16 (Pa. Super. 2007) (*en banc*) (citing *Bilt-Rite Contractors, Inc. v. Architectural Studio*, 581 Pa. 454, 866 A.2d 270 (Pa. 2005) (finding negligent misrepresentation [***4] claim against architect for economic loss viable under § 552)). However, the court concluded § 552(1) and (2) did not apply because, unlike the architect in *Bilt-Rite*, appellee was not in the business of supplying information for pecuniary gain. *Id.*, at 116-17.

Further, the Superior Court declined to adopt § 552(3), reasoning the legislature did not intend to impose liability on utility companies for economic harm occasioned by an inaccurate response under the Act. The court noted the legislature did not provide a private cause of action for economic loss under the Act. Since the economic loss doctrine was well-established when the Act was enacted, the court found the legislature did not intend to impose liability under these circumstances. *Id.*, at 119 (citing *Commonwealth v. Miller*, 469 Pa. 24, 364 A.2d 886, 887 (Pa. 1976) (statutes not presumed to make changes in rules and principles of common or prior existing law beyond what is expressly declared in provisions)).

604 Pa. 50, *53; 985 A.2d 840, **842;
2009 Pa. LEXIS 2794, ***4

We granted allowance of appeal to determine whether § 552 of the Restatement (Second) of Torts imposes liability for economic losses to a contractor caused when a gas utility company fails to mark or improperly marks the location of [***5] gas lines. This is a pure question of law and, thus, our review is plenary. *Bill-Rite*, at 274.

Further, "the standard of review for preliminary objections in the nature of a demurrer is limited; the question presented [*54] by the demurrer is whether, on the facts averred, the law says with certainty that no recovery is possible. Where a doubt exists as to whether a demurrer should be sustained, this doubt should be resolved in favor of overruling it."

Id. (citations omitted).

Appellant argues appellee should be liable for economic losses under § 552(1) and (2), asserting that like the architectural firm in *Bill-Rite*, appellee enjoys an economic benefit from providing accurate information about the location of its underground lines. Applying § 552 to this case, according to appellant, will serve the overall public interest by discouraging negligence among underground utility owners. Alternatively, appellant maintains appellee should be liable under § 552(3) because appellee is under a public duty to provide information about the location of its underground lines; when appellee supplies inaccurate or no information in response to a request under the Act, it violates that duty.

Appellee argues [***6] utility companies should not be equated with design professionals who are hired to prepare plans, drawings, and specifications for pecuniary gain. It asserts *Bill-Rite* only carved out a narrow exception to the economic loss doctrine for design professionals. In response to appellant's alternative argument, appellee urges this Court should not impose liability under § 552(3) because it would be contrary to legislative intent.

We find it apparent our legislature did not intend utility companies to be liable for economic harm caused by an inaccurate response under the Act, because it did not provide a private cause of action for economic losses. *See generally* 73 P.S. § 176 *et seq.* The economic loss doctrine was well-established in tort law when the Act

was enacted, and when the Act was amended in 1986. *See Aikens v. Baltimore and Ohio Railroad Company*, 348 Pa. Super. 17, 501 A.2d 277, 278-79 (Pa. Super. 1985) [**843] (roots of economic loss doctrine first recognized in *Robins Dry Dock and Repair Company v. Flint*, 275 U.S. 303, 48 S. Ct. 134, 72 L. Ed. 290 (1927)). The legislature was presumably aware of the economic loss doctrine when it [*55] established the statutory scheme governing the relationship among the entities required to participate under [***7] the Act. There is simply no statutory basis to impose liability for economic losses here. *See In re Rodriguez*, 587 Pa. 408, 900 A.2d 341, 345 (Pa. 2003) (courts must assume legislature understands legal landscape on which it enacts laws, and when common law rule is not abrogated, they must assume it persists).

This matter is factually distinguishable from *Bill-Rite* and, thus, § 552(1) and (2) do not apply. In *Bill-Rite*, a school district and architectural firm entered into a contract for the design of a new school. As is typical in public contracting, the school district solicited bids from contractors and included the firm's plans, drawings, and specifications in the bid documents. Based on this information, a contractor submitted a bid, which was accepted. During construction, the contractor discovered the firm's specifications were wrong, which caused large cost overruns. The contractor sued the firm for negligent misrepresentation. The trial court found no privity existed between the architect and the contractor and dismissed the claim. *Bill-Rite*, at 272-73. The Superior Court affirmed.

We reversed, holding privity was not a prerequisite for maintaining an action under § 552, and since there [***8] is no privity requirement, "the economic loss rule does not apply to claims of negligent misrepresentation sounding under Section 552." *Id.*, at 288. In adopting § 552(1) and (2)'s formulation as part of Pennsylvania law, we noted such adoption "would not supplant the common law version of the Pennsylvania tort, but rather, would serve to clarify the elements of the tort as they apply to those in the business of supplying information to others for pecuniary gain." *Id.*, at 280.

Here, the Superior Court properly found the instant claim does not sound under § 552(1) and (2). More specifically, the Superior Court aptly explained:

A comparison of the facts presented in

Bitt-Rite to those alleged in the instant complaint reveals that Section 552 is [*56] inapplicable to the current dispute. [Appellant's] complaint fails to state a claim within the parameters of Section 552(1) and (2) because [appellee] is not a defendant who is akin to the architect in *Bitt-Rite* who was a professional information provider. The relationship between utilities and contractors bears no resemblance to the relationships discussed in *Bitt-Rite*. As [appellee] points out:

Architects have months or years to prepare detailed [***9] plans and drawings, typically have detailed information about the project, get paid for their services, and decide what projects to take and with whom and for whom they will work. By contrast, utilities are compelled by law to respond to all requests within just two working days and without remuneration. And the requests are not few and far between

A facility owner under the Act does not engage in supplying information to others for pecuniary gain. Nor do they have any other interest or relationship to the parties involved in the transaction, here a waterline extension project, which necessitates the excavation.

Excavation Technologies, Inc., at 116. Because appellee is not in the business of providing information for pecuniary gain, § 552(1) and (2) do not apply here.

[**844] Further, we decline to impose liability under § 552(3). Initially, we note this Court did not adopt § 552(3) in *Bitt-Rite* because the section was not implicated under those facts. *Bitt-Rite*, at 273 n.1 ("Subsection (3) is not at issue in this case and we offer no view on whether it has any place in Pennsylvania

law."). Nevertheless, appellant maintains this subsection applies because appellee was under a duty to provide [***10] it accurate information as to the location of its underground gas lines. We disagree for multiple reasons.

First, § 552(3) generally applies to non-governmental entities for the protection of particular "segments of the population." *Id.* Our review of the Act reveals its purpose is not to protect against economic losses -- the Act's purpose is to protect against physical harm to individuals working on construction [*57] sites and to avoid property damage to utility equipment and surrounding structures. *See* 73 P.S. § 178(7) (excavators maintain duty to protect against harm to life, health, or property); *id.*, § 180(8) (same); *see also id.*, § 182.2 (enumerating penalties for violations causing property damage, personal injury, or death).

Further, excavators, not utility companies, retain the duty to identify the precise location of facilities. To this end, the Act provides where a utility supplies an excavator with "insufficient information" to locate facilities, the excavator must employ prudent techniques, which may include hand-dug test holes, to determine the precise location of underground equipment. *See id.*, § 177(5)(i). Because the Act does nothing to remove the ultimate responsibility [***11] to prevent breaches of underground facilities from the party doing the digging, § 552(3) does not apply.

Lastly, we find public policy weighs against imposing liability here. Permitting recovery would shift the burden from excavators, who are in the best position to employ prudent techniques on job sites to prevent facility breaches. *See id.*, § 177(5)(i); *Cucchi v. Rollins Protective Services Co.*, 524 Pa. 514, 574 A.2d 565, 575-76 (Pa. 1990) (Nix, C.J., concurring) (object of tort law is to modify behavior through allocation of financial risk on party best positioned to prevent harm). We recognize an excavator's breach of gas lines causes delay in completing projects, but if utility companies are exposed to liability for excavators' economic losses, such costs would inevitably be passed on to the consumer; if this is to be done, the legislature will say so specifically. Until that day, we decline to afford heightened protection to the private interests of entities who are fully capable of protecting themselves, at the public's expense.

Based on the foregoing, the order of the Superior Court is affirmed.

Jurisdiction relinquished.

Madame Justice Todd did not participate in the consideration or decision [***12] of this case.

[*58] Mr. Chief Justice Castille, Messrs. Justice Baer and McCaffery and Madame Justice Greenspan join the opinion.

Mr. Justice Saylor files a concurring opinion.

CONCUR BY: SAYLOR

CONCUR

CONCURRING OPINION

MR. JUSTICE SAYLOR

I support the majority's determination that Sections 552(1) and (2) of the Second Restatement are not applicable, as well as its decision to decline to expand Pennsylvania common law via the adoption of Section 552(3) of the Second Restatement. I depart, however, from the majority's reasoning to the extent that it downplays the obligations of facility owners under the One Call Act. *See, e.g.*, Majority Opinion, *slip op.* at 6 ("[A]ppellant maintains . . . appellee was under a duty to provide it accurate [**845] information as to the location of its underground gas lines. We disagree for multiple reasons."). Further, my assessment regarding Section 552(3) is moderately different.

Under Section 2 of the enactment, facility owners have the "duty" to mark, stake, locate or otherwise provide the position of the facility owner's underground lines at the site within eighteen inches horizontally from the outside wall of such line in a manner so as to enable the excavator, where appropriate, to [***13] employ prudent techniques, which may include hand-dug test holes, to determine the precise position of the underground facility owner's lines.

73 P.S. § 177(5)(i). The "tolerance zones" resulting from fulfillment of the facility owner's statutory obligation have a direct and substantial impact on the

responsibilities of excavators. *See, e.g.*, 73 P.S. § 180 (requiring excavators working "[w]ithin the tolerance zone" to "employ prudent techniques, which may include hand-dug test holes, to ascertain the precise position of such facilities" (emphasis added)).

Like the majority, I recognize that compliance with the One Call Act represents a substantial imposition upon facility owners. Nevertheless, facility owners derive considerable benefits from maintaining often exclusive underground distribution networks to serve their customers. Moreover, the damage prevention industry standards recommended by Common [*59] Ground Alliance universally recognize that "damage prevention is a shared responsibility." ¹ Various excerpts recognize the critical interrelationship between the facility owners' and excavators' respective duties:

More communication between the excavator and the facility owner operator is [***14] a growing necessity as the area of excavation is getting more crowded everyday with new underground facilities. . . . The facility owner/operator is required to 1) mark its underground facilities with stakes, paint or flags or 2) notify the excavator that the facility owner/operator has no underground facilities in the area of excavation. . . . Once the excavator has all of the information needed for the work area, he/she can then excavate with confidence with safety in mind for the work crew and the public at large.

Common Ground Alliance Best Practices, Version 6.0 § 5-8, Practice Description (Feb. 2009). ²

¹ Common Ground Alliance is a nonprofit corporation created pursuant to the issuance of the United States Department of Transportation's Common Ground Task Force report in 1999. *See* 73 P.S. § 176. Common Ground Alliance's best practices recommendations are effectively incorporated into the One Call Act. *See* 73 P.S. § 184 ("Except as otherwise provided for by this act, persons shall use their best efforts to comply with the Common Ground Alliance best practices.").

² In stressing the responsibilities of excavators over facility owners, the majority discusses a

scenario involving "insufficient [***15] information," which is specifically covered by the statute, then references Section 2 of the One Call Act as requiring the excavator to employ prudent techniques such as hand-dug test holes to prevent breaches of underground facilities. See Majority Opinion, *slip op.* at 6-7 (citing 73 P.S. § 177(5)(i)). The difficulty with this assessment is that subsection 5(i) of Section 2 appears to address the application of prudent techniques within tolerance zones specified by facility owners. See 73 P.S. § 177(5)(i). Thus, the statute again reinforces the dependence of excavators, in the exercise of their own responsibilities, on the careful execution of the facility owners' own obligations. Indeed, the One Call Act makes specific provision for instances in which there are known uncertainties in locating facilities, requiring the specific exercise of prudent techniques if digging is to proceed and providing for additional compensation by project owners. See 73 P.S. § 180(15). At least by implication, the same level of caution is not required where the facility owner has made a positive identification, and excavation proceeds in areas outside the tolerance zones for marked locations.

Notably, [***16] the majority's comments address only the scenario entailing "insufficient information" as to the location of facilities, Majority Opinion, *slip op.* at 7, and not one involving misinformation such as that alleged in Appellant's complaint. See Complaint P6, R.R. at 5a (averring that Appellee "supplied false information for guidance to plaintiff in its business transactions, causing pecuniary loss to plaintiff as a result of plaintiff's justifiable reliance upon the information the defendant provided").

[**846] For the above reasons, I believe the One Call Act, like the Common Ground Alliance Best Practices, fosters a sense of shared responsibility for the protection of buried utilities for [*60] the benefit of the public at large. In this regard, I believe facility owners are required to provide accurate information to the best of their ability and to coordinate with excavators where there are uncertainties.

In addressing remedies for breach of a facility

owner's duties, I acknowledge Appellant's strong argument for the adoption of Section 552(3):

Section 552(3) is narrowly tailored to apply in specific instances where a public duty extends to a class of persons for whose benefit the duty was created. [***17] Such an instance exists here. Without the statutory protections of the One Call Act, contractors would have to dig and perform their services without any knowledge of what is beneath the surface. The One Call Act was enacted, in large part, to protect contractors and their employees from these potentially dangerous and fatal situations where excavating occurs without proper information from the facility owners as to what was placed beneath the surface. If facility owners do not provide accurate information as to the location of their underground facilities, contractors could, and probably will, strike or damage the facilities, which would cause harm to the contractor, the contractor's employees and the general public. Providing accurate information is one of the public duties that the One Call Act triggers and facility owners must be held responsible for their negligent actions if, as here, such damages were foreseeable.

Brief for Appellant at 33-34.

Nevertheless, there are substantial countervailing considerations, including the social impact (including increased rates [*61] charged to consumers) of exposing facility owners to a new class of litigation. Furthermore, as I have otherwise observed:

Our [***18] common-law decisions are grounded in records of individual cases and the advocacy by the parties shaped by those records. Unlike the legislative process, the adjudicatory process is structured to cast a narrow focus on matters framed by litigants before the Court in a highly directed fashion. The broader tools available to the legislative branch in making social policy judgments,

604 Pa. 50, *61: 985 A.2d 840, **846;
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including the availability of comprehensive investigations, are discussed in *Pegram v. Herdrich*, 530 U.S. 211, 221-22, 120 S. Ct. 2143, 147 L. Ed. 2d 164 (2000).

Bugosh v. I.U. N. Am., Inc., 601 Pa. 277, 298, 971 A.2d 1228, 1240 n.19 (2009) (Saylor, J., dissenting, joined by

Castille, C.J.).

On balance, I support the majority's decision to the degree it holds that any remedy for economic loss associated with a facility owner's breach of its locating duties under the One Call Act is best suited to legislative consideration.

EXHIBIT I

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

3M™ Electronic Marking System (EMS) iD Ball Marker

Installation Instructions

1.0 Introduction

- 1.1 3M™ iD Ball Markers provide an accurate, convenient, long lasting method of marking underground facilities during construction or maintenance. They also make the job of precisely locating underground facilities easier. Other buried markers can be disturbed by backfill dirt or installed improperly so they don't stay positioned correctly. The 3M iD Ball Markers unique self-leveling design ensures the marker is in an accurate, horizontal position regardless of how it is placed into the ground. 3M iD Markers enable you to return to the exact location of the marked underground feature and ensure positive identification by reading the stored data and unique serial number in each iD Marker. Unlike surface markers such as stakes, flags or paint, the iD Ball marker cannot be inadvertently moved or worn away by weather.

2.0 Removable Identification Number Tag

- 2.1 Prior to burying the iD Marker, remove the identification number tag and attach it to "as-builts", or facility documentation, as required by company procedure.

3.0 Writing Information to iD Markers

- 3.1 If the iD marker is intended to contain specific facility information, write the information to the iD marker prior to burying using one of the 3M™ Dynatel™ M-Series iD version locators (see list below).
- 3.2 Hold the 3M™ Dynatel™ M-Series iD Locator receiver over the top of the iD marker. The maximum distance between the marker and the locator tip during writing is 12 in. (30 cm).
- 3.3 For iD Marker writing instructions, please refer to the following Operator's Manuals: 3M™ Dynatel™ EMS-iD Locator 1420, 3M™ Dynatel™ Cable/Pipe/Fault Locator 2250M/2273M Series or 3M™ Dynatel™ Cable/Pipe/Fault Locator 2550/2573 Series.

4.0 Installing the iD Marker

- 4.1 Before placing the iD Marker over the key point of the facility, decide if a tie down procedure is necessary to keep it in place. If so, secure the iD Marker by inserting a cable tie through one, or both, tie down tabs on the iD Marker and the key point (for example, pipe, cable or splice).
- 4.2 If the key point is metallic, it is recommended that the iD Marker be separated from it by a minimum distance of 4 inches (10 cm) of clean fill dirt.
- 4.3 If the key point is non-metallic, place the iD Marker over the desired location.

IMPORTANT: The iD Ball Marker cannot reliably re-radiate the locator's signal at a depth greater than 5 feet (1.5 m). If using an E-model locator in countries following CE limitations, or equivalent, the maximum depth is 4 feet (1.2 m). This is the maximum allowable distance between iD Ball Marker and the locator tip.

- 4.4 Hand fill at least 6 inches (15 cm) of soil over the iD Marker to prevent movement, or damage, during backfill.
- 4.5 Backfill the hole.

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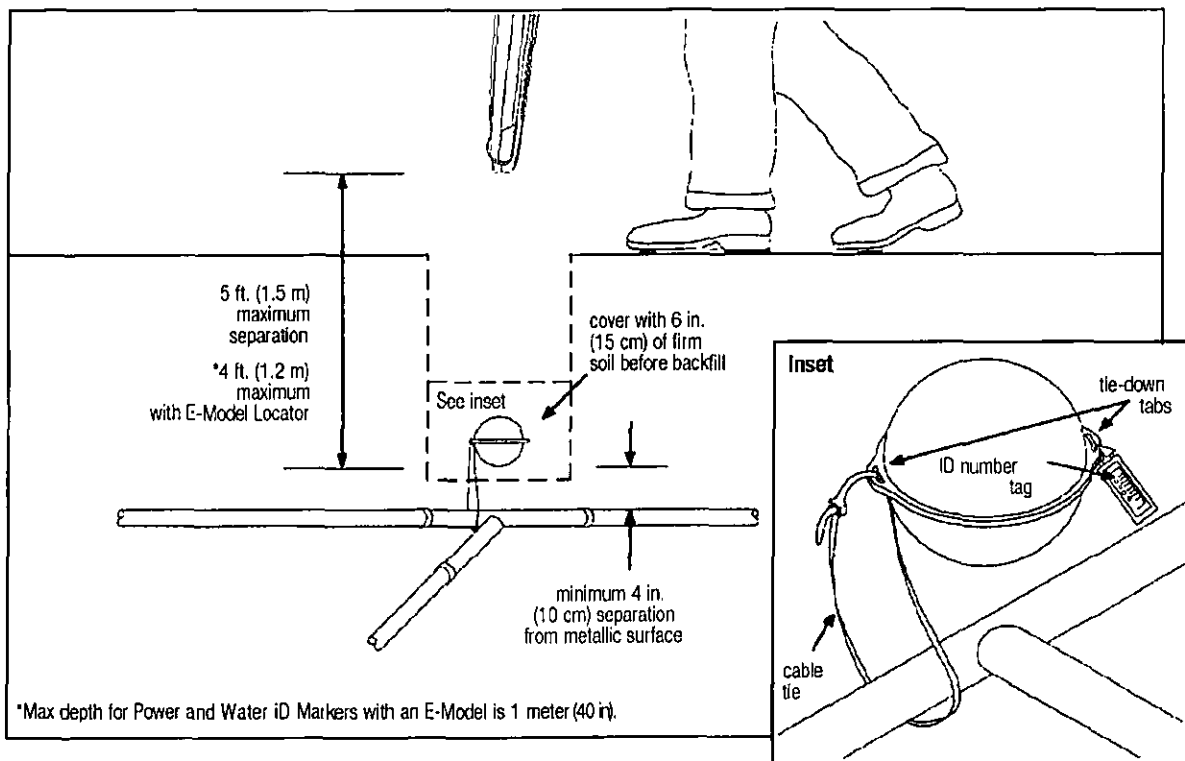
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

5.0 Specifications

Specifications

Read Depth (max)	
Locator, US-Version	5 ft (1.5 m)
Locator, E-Version	1.2 m (48 in) (Telephone, Gas, Waste Water, Communication)
	1.0 m (40 in) (Power, Water)
Program Distance (max)	12 in (30 cm)
Vertical Separation from Facility (min)	4 in* (10.4 cm)
Horizontal Separation from Facility (min)	4 in* (10.4 cm)
Distance Between ID Markers (min)	3.5 ft (1.06 m)
Marker Diameter, Sphere	4 in (10.4 cm)

* Target size and material dependent. Depth estimation may be adversely affected when placing the marker above a large metallic object, such as a manhole cover. To improve depth estimation accuracy, increase the vertical separation from the metal object or perform a field test for depth accuracy.



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www.3M.com/dynatel

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78-8130-6423-1-D


3M Dynatel™

EMS-iD Locator 1420

Operators Manual

1420

1420E

CE 0678 

January 2004

78-8130-6741-6-D

Congratulations! You have just purchased one of the finest, most advanced EMS locating devices available today!

The 3M™ Dynatel™ Marker Locator 1420 is designed with all of the functionality of previous Dynatel models, and with the enhanced capability to read and write unique user information into the new 3M™ EMS iD Ball Markers 1400 Series. Information such as a pre-programmed unique identification number, facility data, application type, placement date and other details can all be read, stored and transmitted back to your PC for enhanced resource management with this revolutionary equipment. The Dynatel Marker Locator 1420 will also detect two different types of utility markers simultaneously.

We at 3M are dedicated to bringing you premium equipment with outstanding reliability, backed by one of the best warranties in the business, and outstanding service.

Statement of Conformity

“Hereby, 3M Company declares that this Underground Locating Product is in compliance with the essential requirements and other relevant provisions of Directive 1999/5/EC.”

www.3m.com/market/telecom/access/conformity/

Statement of Intended Use

These 3M™ Dynatel™ Advanced Marker and Cable/Pipe Locating Products: 1420E, 2250ME, 2273ME, 2250ME-iD, 2273ME-iD models are designed and tested for use in locating 3M buried markers, utilities and structures. These 3M markers are used to identify buried utilities and structures. The products have not been tested or proven safe for other uses. The use of these products may be subject to licensing restrictions.

***** WARNING *****

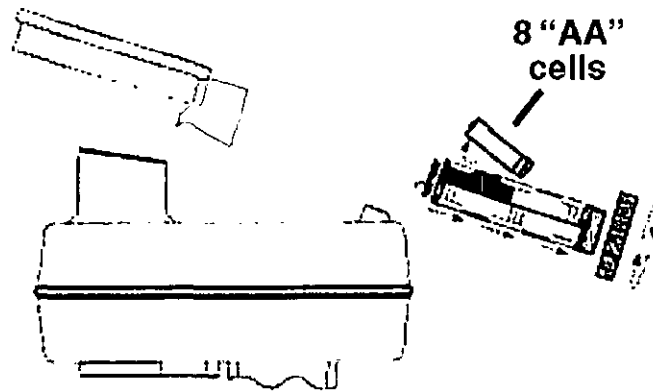
It is unlawful to operate this unit in any country with a configuration setting that is not specific to that country. In order to prevent the user from operating this unit with a configuration setting that is not specific to the country where it is operated, this unit is equipped with configuration software for installing country specific configurations. Please refer to the initial configuration setup sheet.

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QUICK START

Battery Installation



The receiver batteries are tested for two seconds every time the unit is turned on.



The bar graph will fill to the relative battery level.
The Battery Icon [8] on the Locate Screen will continuously indicate the battery level.

CAUTION!

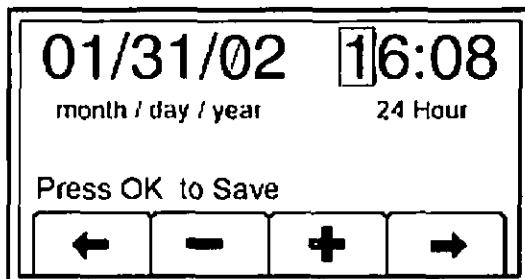
Insure batteries are installed with proper polarity. Do not charge batteries or dispose of them in fire. Batteries may leak or explode and cause personal injury. Always remove batteries when storing the units for long periods of time.

Battery Disposal: Since regulations vary, consult applicable guidelines or authorities for proper disposal.

Setting the Receiver Clock

Set the time, date, and date format of the receiver. Depth and read/write marker information are time and date stamped.

MENU [6] + SETUP [SK] + CLOCK [SK]



Press the left/right arrow [SK] to highlight the digit of the date or time to change.

Press the + or - [SK] to increment or decrement.

When the date format is highlighted, the format will toggle between mm/dd/yy and dd/mm/yy.

Press OK [SK] to save, or Menu [6] to cancel.

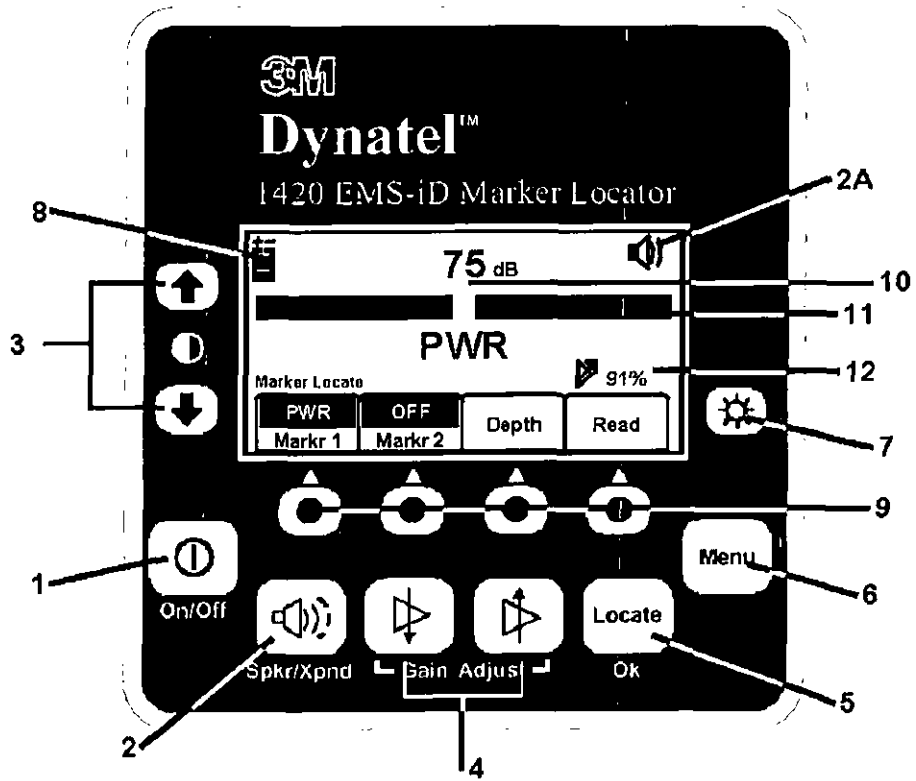


Figure 1

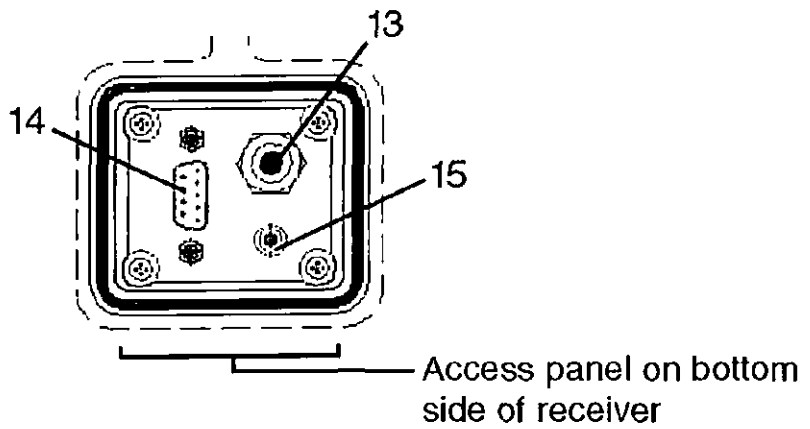


Figure 2

RECEIVER KEY PAD DEFINITIONS

Figure 1

POWER: [1] Turns unit off and on.

SPEAKER: [2] Adjusts the volume of the receiver (off, low, med and high).

SPEAKER ICON [2A]: Indicates the relative volume level of the receiver.

CONTRAST: [3] The arrows located above and below the contrast icon will adjust the contrast of the screen.

GAIN: [4] Adjusts the sensitivity of the receiver either up or down to maintain a satisfactory signal level.

LOCATE/OK: [5] Sets the receiver to trace mode for locating markers.
Acknowledges setup entries (OK).

MENU: [6] Displays setup screen for configuration of the unit, i.e.: clock, language, depth units and marker data.

BACKLIGHT: [7] Toggles the backlight low, high, and off.

BATTERY ICON: [8] Indicates battery level.

SOFT KEY: [SK] There are four soft keys on the receiver. The function of each key is shown above the key on the display screen. The functions will change, depending on the operation mode of the receiver. For instruction purposes, the display command is followed by [SK] to identify it as a soft key.

SOFT KEY COMMAND: [9] Definitions for each of the four soft key functions.

SIGNAL STRENGTH: [10] Digital reading of the signal the receiver is detecting.

BAR GRAPH: [11] Graphical representation of the received signal.

GAIN LEVEL: [12] Displays the relative gain level.

Figure 2

EXTERNAL JACK: [13] Not active on this model.

SERIAL PORT: [14] RS232 port to connect the receiver to a PC via straight serial cable (not included).

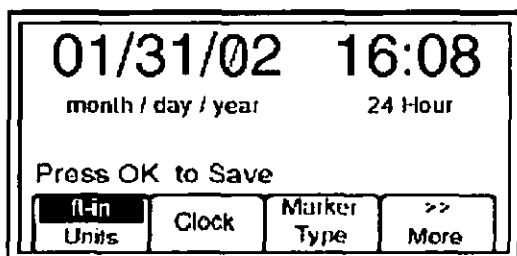
EARPHONE JACK: [15] Will fit standard 1/8 inch mini-jack mono earphone plug (not included).

CONFIGURING THE RECEIVER

In the setup mode the units of depth measurement, time, date, date format and language can be set. The receiver can be configured to detect specific utility markers.

Selecting Depth Units

MENU [6] + Setup [SK] +Units [SK]



Press Units [SK].

The soft key command will toggle between inches (in), centimeters (cm), and feet/inches (ft-in).

Selecting a Language

MENU [6] + Setup [SK] + Lang [SK]

The soft key command will cycle through all available languages.

ELECTRONIC MARKERS AND EMS-ID MARKERS

E-Model Initial Configuration

Attention: All E-Model / iD Locators must run the initial configuration setup found in the 3M™ Dynatel™ Locator PC Tools software.

Activating the Marker Locate Feature

In order to enable the electronic marker location feature of this receiver, you must identify the country in which the locator will be used. This initial configuration is required for the 2273ME-iD, 2250ME-iD, and 1420E locator receiver models.

Some countries do not allow all marker operating frequencies. Therefore, the E-Model locators are shipped with all the marker types/frequencies disabled.

***** WARNING *****

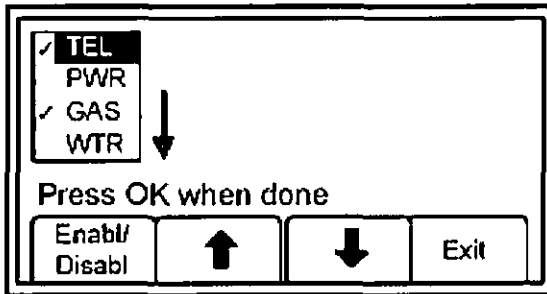
It is unlawful to operate this unit in any country with a configuration setting that is not specific to that country. In order to prevent the user from operating this unit with a configuration setting that is not specific to the country where it is operated, this unit is equipped with configuration software for installing country specific configurations.

Initial Configuration

- Install the software provided on the enclosed CD.
(3M™ Dynatel™ Locator PC Tools)
- Close any programs that may be using the COM ports.
- Start the software program.
- Connect the receiver to the PC via the RS232 serial cable.
- Turn the receiver on.
- From the main screen, select the country in which the unit will be operating. (If the country is not listed, select “All other countries”.)
- A communication window will appear. (Baud rate 38400 / Com Port 1)
Press .
- Press .
- Press .
- Prompt line will display:
- Multiple units may be configured, at this point by simply connecting the next receiver, turning it on, and pressing download.
- Press when all units have been configured.

Enabling/Disabling Marker Types

MENU [6] + SETUP [SK] + Marker Type [SK]



The unit will default with all markers enabled (✓).

Press the up/down arrows [SK] to highlight a utility to enable or disable.

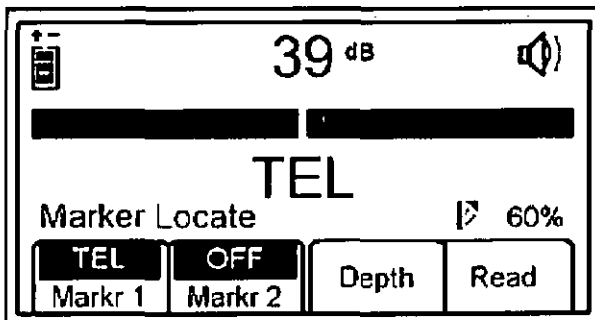
Press Enabl/Disabl [SK].

Only the markers that are enabled (✓) will be available in the locate mode.

Press OK [5] to save settings or Exit [SK] to cancel.

Locating EMS Markers

Single Marker Locate



Press Locate [5]

Press Markr 1 [SK Toggle] to select desired utility.

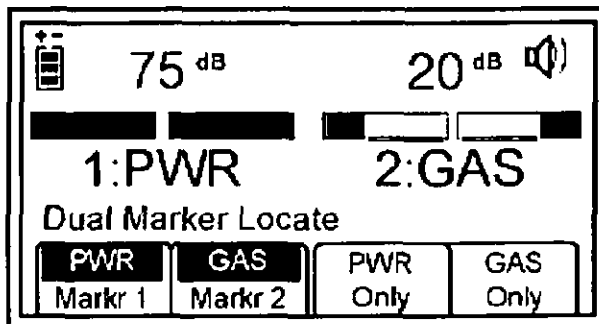
Markr 2 should be OFF.

Note: Only the marker types enabled in the setup menu will be shown.
(See Enabling/Disabling Marker types).

Adjust the Gain Down [4] until the bar graph opens.
The bar graph will close, the audio will be steady, and the signal strength will be maximum when the receiver detects a marker of the specified utility.

Dual Marker Locate

Press Locate [5].



Press Markr 1[SK Toggle] to select desired Utility.
Press Markr 2[SK Toggle] to select desired Utility.

Note: Only the marker types enabled in the setup menu will be shown.

The third and fourth soft key commands will populate with the types of utilities selected for Marker 1 and Marker 2.

Adjust the Gain Down [4] until the bar graphs open.

The bar graph will close, the audio will increase, and the signal strength will be maximum when the receiver detects a marker of the specified utility.

When one of the two markers is detected, press the “XXX Only” [SK] for the detected utility marker.

The unit will switch to Single Marker Locate in order to pinpoint the marker.
Press Markr 2 [SK Toggle] to return to Dual Marker Locate.

Marker Depth Estimate

iD Marker Depth

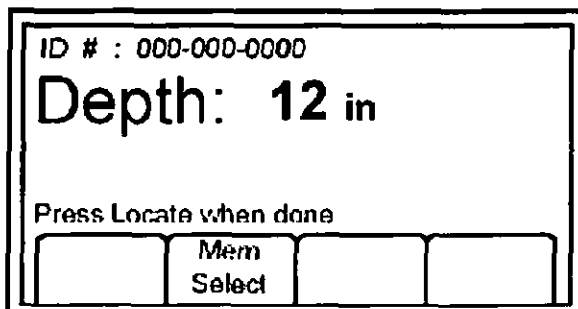
Lower the tip of the receiver to the ground over the targeted marker.

Press Depth [SK].

The receiver will examine the marker (Calculating signal, please wait...)

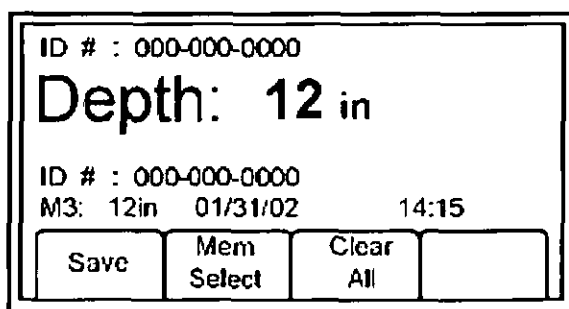
If the marker is an iD marker:

The receiver will display the depth of the marker, and its identification number.



Five depth readings can be saved with the time, date, and its identification number.

To save the depth reading, press Mem Select [SK].



Save [SK] will place each entry in sequential order in memory (M1 - M5) until five readings have been stored. The unit will overwrite saved entries in excess of five, beginning with M1.

Press Clear All [SK] to delete all stored depth information.

The operator may select the memory location to store the depth readings by pressing Mem Select [SK]. When the preferred location appears on the screen, press Save [SK]. The screen and memory location will populate with the current information.

Each memory location can be reviewed by pressing Mem Select [SK]. Press Locate [5] to return to Marker Locate Mode.

If a 3M™ iD marker is detected, but the surrounding conditions are noisy, or there is more than one marker present, the Unit will display “???” instead of the identification number of the marker in the Depth Screen. To retrieve the data from the marker, press Read [SK] from the marker locate screen. (See Reading iD Markers)

Depth of Passive, Non-iD Marker

Lower the tip of the receiver to the ground over the targeted marker.

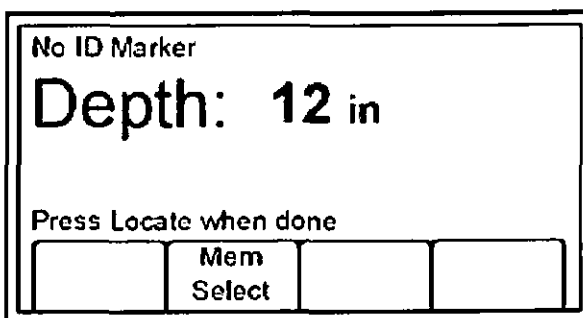
Press Depth [SK].

The receiver will examine the targeted marker. (Calculating signal, please wait)

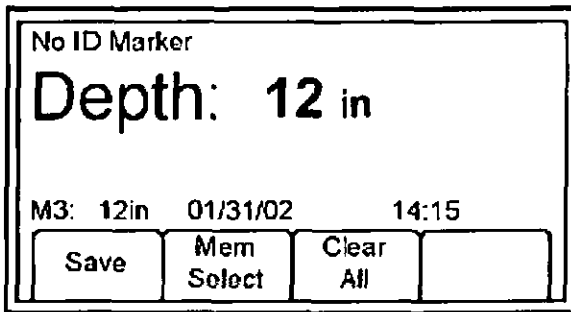
The screen will instruct the operator to raise the unit 6 inches (15.2 cm) from the ground.

Raise the unit 6 inches and press Depth [SK] again.

Press the Depth [SK] key again. The estimated depth of the marker from ground level will display on the screen.



Five depth readings can be saved with the time, and date. To access the memory locations, press Mem Select [SK].



Save [SK] will place each entry in sequential order in memory (M1 - M5) until five readings have been stored. The unit will overwrite saved entries in excess of five, beginning with M1.

Press Clear All [SK] to delete all stored depth information.

The operator may select the memory location to store the depth readings by pressing Mem Select [SK Toggle]. When the preferred location appears on the screen, press Save [SK]. The screen and memory location will populate with the current information.

Each memory location can be reviewed by pressing Mem Select [SK Toggle].

Press Locate [5] to return to Marker Locate Mode.

Reading 3M™ iD Markers

The operator can retrieve the data from the iD marker by pressing Read [SK] (on the locate screen or the depth screen).

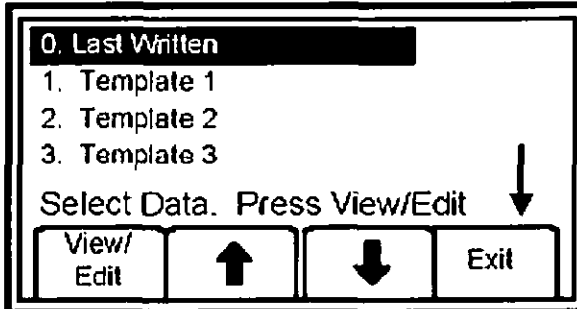
The receiver tip should be lowered to the ground to reach maximum read depth.

All the information retrieved from the marker, including the date and time read, is saved into the 'Read History' file of the receiver. (See Reviewing Marker History)

Writing iD Markers

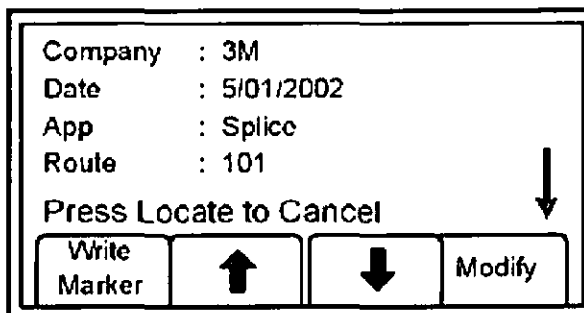
The write mode enables the user to write or program information into 3M™ EMS iD markers 1400 Series. It is also possible to edit the information to be programmed.

MENU [6] + WRITE MODE [SK] +



Select a template from the list on the screen, to program into the marker by pressing the up/down arrows [SK] to highlight the preferred template. 'Last Written' is the most recent data that was programmed to a marker by the receiver.

Press View/Edit [SK].

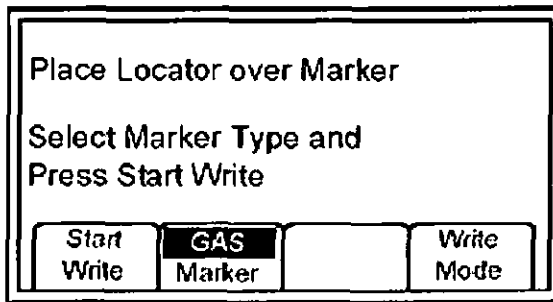


The screen will display the information from the selected template. The arrow on the right side of the screen indicates there is more information than can be displayed on the screen (scroll down by pressing the down arrow [SK]).

Enter user information that will be written to this marker. (See Editing Marker Data.)

Verify all information is correct.

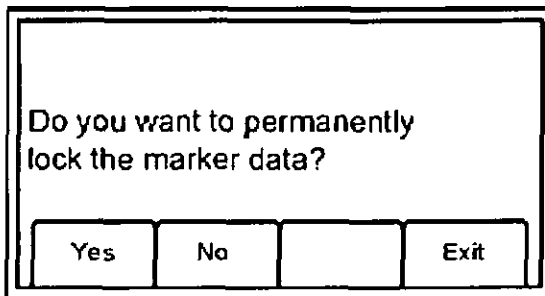
Press Write Marker [SK].



Select type of marker to be written [SK Toggle].

Hold the receiver directly over the top of the marker. The receiver should be within 12 inches (30 cm) of the marker.

Press Start Write [SK].



The receiver will ask if the user wants to permanently lock the marker data. Select Yes [SK] or No [SK]. The receiver will write the data to the marker.

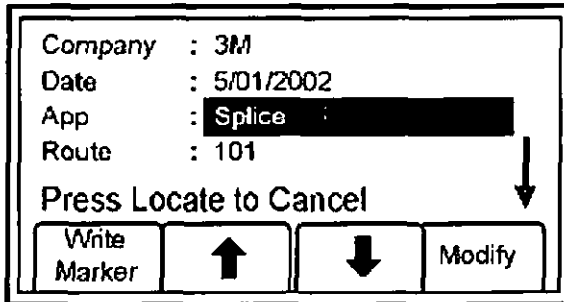
Note: Once the marker data has been locked the information contained on the marker is PERMANENT.

Editing Marker Data to be Programmed

To alter the information to be programmed into the marker
Press Menu [6] + Write Mode [SK].

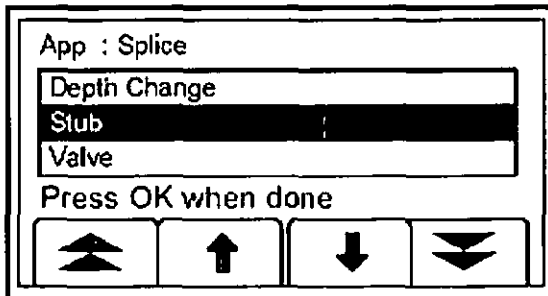
Select a template from the list on the screen, to program into the marker by pressing the up/down arrows [SK] to highlight the preferred template. "Last Written" is the most recent data that was programmed to a marker by the receiver.

Press View/Edit [SK].

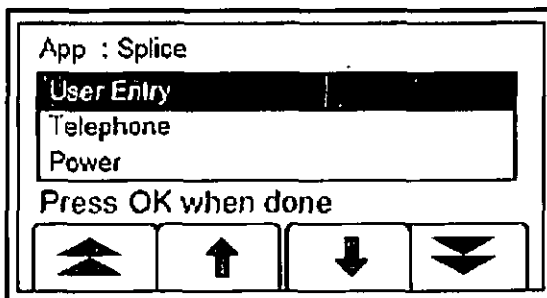


Press the up/down arrows [SK] to highlight the information to change.
Press Modify [SK].

The operator has two options from the modify screen.

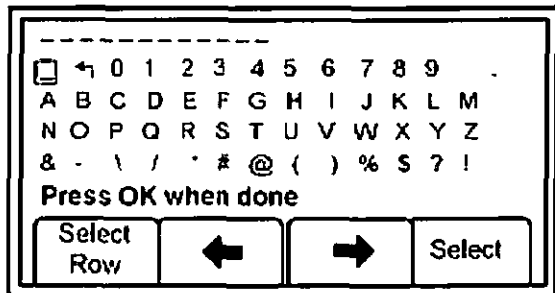


Option #1: Select a term from the list by pressing the up/down arrows [SK].
Press OK [5].



Option #2: Manually enter information by selecting "User Entry".
Press OK [5].

If User Entry is selected, the following screen will appear.



Move the boxed cursor to the 'back arrow' and press Select [SK] to delete the entry to be modified.

Move the boxed cursor by pressing the left/right arrows [SK] or Select Row [SK] to move the cursor to the next row.

Press Select [SK] to enter the alphanumeric character.

Entry will appear at the top of the screen.

Press OK [5] when entry is complete.

Press Write Marker [SK] to program the target marker.

To cancel press Locate [5].

Reviewing Marker History

Read History

The data review Read history mode is a historical file of all information that has been read from targeted markers (100 memory locations).

MENU [6] + DATA/TEMPLAT [SK] + Read History

mm.dd.yy	Time	ID #	
01 . 01 . 00	15:57	143 - 560 - 7731	
01 . 01 . 00	15:57	143 - 560 - 7731	
03 . 03 . 00	11:23	150 - 994 - 9540	
Record # :	73	LastRead : 73	
Marker Details	↑	↓	Exit

The Read History screen displays the date and time that each marker was read, and its unique identification number.

Select the marker data to be viewed by pressing the up/down arrows [SK]

Press Marker Details [SK] to view all data that was retrieved from the marker.

Record# : 19/38			
ID Number : 123 - 123 - 1234			
Company : 3M			
Voltage : 440 V			
Section : TR54-9			
1422 PWR XR-ID -Ball			
Read History	↑	↓	Exit

Press Read History [SK] to return to list or
 Press Exit [SK] to return to data review screen.

Write History [SK]

MENU [6] + Data Templat [SK] + Write History

Select the marker data to be viewed by pressing the up/down arrows [SK].

mm.dd.yy	Time	ID #	
01 . 01 . 00	15:57	143 - 560 - 7731	
01 . 01 . 00	15:57	143 - 560 - 7731	
03 . 03 . 00	11:23	150 - 994 - 9540	
Record # : 73			
Marker Details	↑	↓	Exit

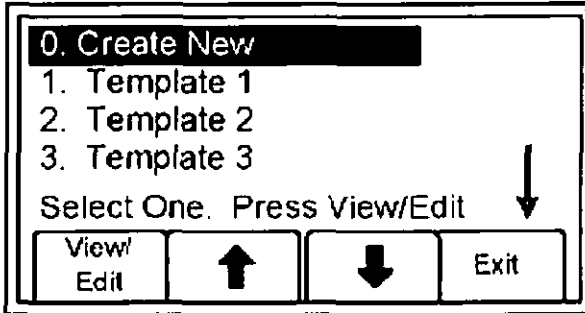
Press Write Details [SK] to view all data that was sent to the marker.
 Press Write History [SK] to return to the list of programmed data.
 Press Exit [SK] to return to data review screen.

Creating/Editing Templates for 3M™ iD Markers

In the User Template screen, the operator can create and modify templates to program iD markers.

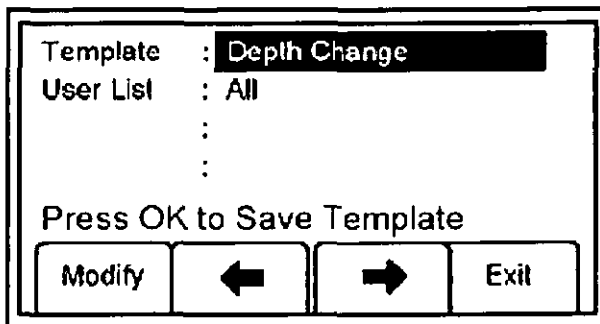
Creating New Templates

MENU [6] + Data/Templat [SK] + User Templat [SK]



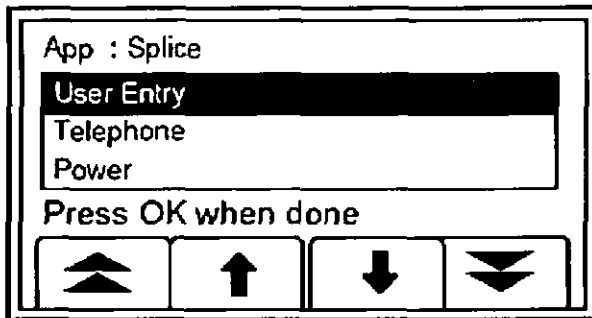
Select create new or a preprogrammed template by pressing the up/down arrows [SK].

Press VIEW/EDIT [SK].



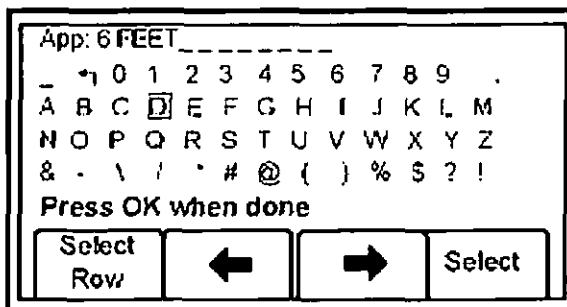
If creating a new template, name the template.

Press Modify [SK] to populate, or edit a field.



Select from a list of labels and terms, or choose User Entry (manual alphanumeric entry).

If user entry is selected, the following screen will appear.



Move the boxed cursor by pressing the left/right arrows [SK] or Select Row [SK] to move the cursor up or down.

Press Select [SK] to enter the alphanumeric character.

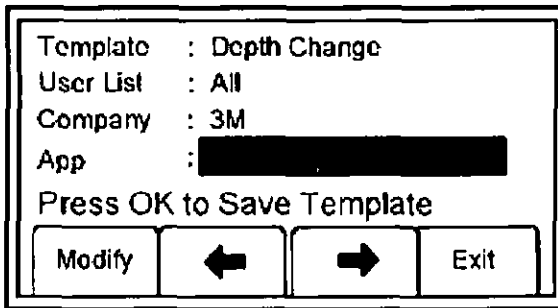
Entry will appear at the top of the screen.

Press OK [5] when entry is complete.

Press Write Marker [SK] to program the target marker.

Press Locate [5] to cancel.

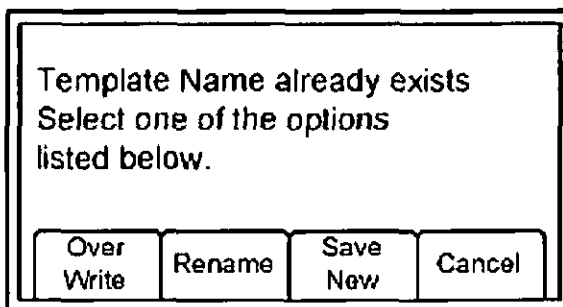
Note: To clear the previous field entry, select the “back arrow” with the cursor and delete the previous entry.



Navigate through the fields on the screen using the left/right arrows [SK]. Press OK [5] to save the template.

Editing Templates

The operator can select an existing template and makes changes to it in the same manner describe in Creating Templates. The following save screen will appear.



Over Write: Saves all modifications that have been made to the original template.

Rename: Overwrites the old template with the new name and all modifications. Screen will return to the template name field. Modify the name of the template and press OK [5] to save.

Save New: Creates a new template containing all information. Original template remains unchanged. Screen will return to the template name field. Modify the name of the template and press OK [5] to save.

Cancel: Clears all modifications made to any unsaved template.

Note: User templates can also be created on a PC using 3M™ Dynatel™ Locator PC Tools software and then downloaded to the receiver via the RS232 port [13] on the unit.

HELP MODE

MENU[6] + More>> [SK] + Help [SK]

The help screen contains basic information about the unit and its operation. It is designed to be a quick reference guide.

Press the double up/down arrows [SK] to navigate between sections.

The single up/down arrows [SK] will scroll the screen line by line.

3M™ DYNATEL™ LOCATOR PC TOOLS

The Dynatel Locator PC Tools is a software program for the computer. It allows the user to transfer Read/Write iD marker data to PC files, create templates and term lists to copy to the locator, configure the receiver (frequencies, units, etc), and perform software upgrades.

Please refer to operating instructions included with the software.

SELF TEST OF RECEIVER

MENU [6] + MORE>>[SK] + Self Test [SK]

This operation performs a self-test on the receiver.

The receiver will display current information about the unit (model number, serial number, software revision, and hardware revision).

Press RUN [SK] to start the self test.

A status bar will appear while the self test is running.

Results will appear on the screen when the test is complete.

Specifications (1420, 1420E)

Frequencies / Markers		
General Purpose, Communication, Gas, Telephone		
Water, Waste Water, Power		
Search Range	Refer to Marker specifications	
Read Range: (XR-iD Ball Markers)		
Model: 1420	All Types	5 ft (1.5 m)
Model: 1420E	All Types except Power	4 ft (1.2 m)
Model: 1420E	Power Marker	40 in (1 m)
Program Range	XR/iD Ball Markers	1 ft (30 cm)
Marker depth accuracy	+/- 15% +/-2 in (5 cm)	
Dual Marker Locate Mode:	Any 2 marker types	
Weight w/ Batteries:	4 pounds	
Average Battery Life:	20 Hours	

Note: The battery life is measured at 73F/23C, with 5% usage of the backlight at normal level and audio set to medium level.

The ratio of Marker Read operations to Marker Locate is assumed to be 1:1.

CE 0678 !

CE This product is in accordance with the requirements of the European directive 99/5/EC

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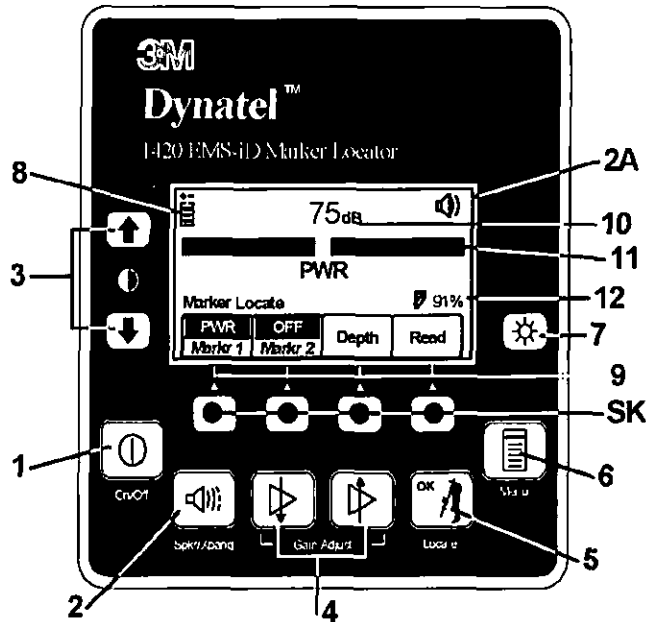
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3M Dynatel™ 1420 EMS-iD Marker Locator

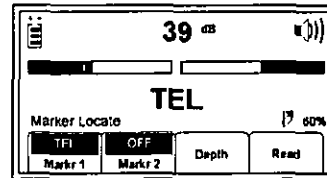
Marker Locating Quick Reference Guide



- [1] **POWER:** Turns unit off and on.
- [2] **SPEAKER:** Adjusts the volume of the receiver
- [2A] **SPEAKER ICON:** Indicates the volume level of receiver.
- [3] **CONTRAST:** Adjust contrast of screen
- [4] **GAIN:** Adjust the sensitivity of the receiver
- [5] **LOCATE/OK:** Sets the receiver to cable locate mode. Acknowledges setup entries (OK)
- [6] **MENU:** Displays screens for configuration of the unit, i.e.: clock, depth units, etc.
- [7] **BACKLIGHT:** Toggles the backlight low, high, and off.
- [8] **BATTERY ICON:** Indicates battery level.
- [SK] **SOFTKEYS:** The function of each Softkey is shown above the key on the screen.
- [9] **SOFT KEY COMMAND:** Definitions for each of the four soft key functions.
- [10] **SIGNAL STRENGTH:** Digital reading of the signal the receiver is detecting.
- [11] **BAR GRAPH:** Graphical representation of the received signal.
- [12] **Gain Level:** Displays the relative gain level.

Locating EMS Markers

1. Press Power [1]
2. Press Locate [5]
3. Press Marker [SK]
4. Press Markr 1 [SK Toggle] to select desired utility.
5. Markr2 should be OFF.
6. In an area where there are no markers, adjust the Gain Down [4] until the bar graph [10] opens.
7. The bar graph will close, the audio will be steady, and the signal strength (dB) will be maximum when the receiver detects a marker of the specified utility.



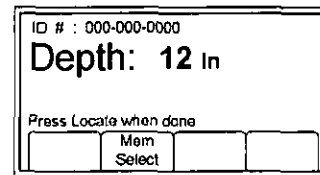
Note: Only the marker types enabled in the setup menu will be shown. (See 1420 manual: Enabling/Disabling Marker types).

ID Marker Depth

1. Target the marker.
2. Lower the tip of the receiver to the ground.
3. Press depth [SK]
4. The receiver will examine the marker (Calculating signal, please wait...)

If the marker is an iD marker:

The receiver will display the depth of the marker, and its identification number.



Depth of Passive, Non-iD Marker

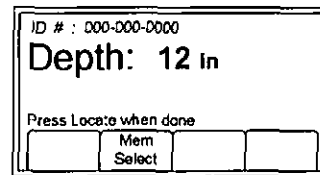
1. Target the marker.
2. Lower the tip of the receiver to the ground.
3. Press depth [SK]

The receiver will examine the marker (Calculating signal, please wait...)

The screen will instruct the operator to raise the unit 6 inches from the ground.

4. Raise the unit 6 inches
5. Press Depth [SK] again.

The estimated depth of the marker from the ground level will display on the screen.



Reading iD Markers

The operator can retrieve the data from the iD marker by pressing Read [SK]. The receiver tip should be lowered to the ground to reach maximum read depth.

3M
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 800-426-8688
<http://www.3M.com/dynatel>

EXHIBIT J

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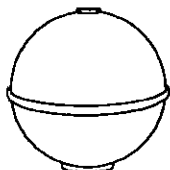


An Exelon Company

GAS MARKER BALLS

REV. NO.	DATE	DESCRIPTION
001	05.13.2015	REVISED SECTIONS 5.1.3, 5.5.1, 5.5.2, 5.5.3 AND ADDED SECTIONS 5.1.4 AND 5.5.4

3M MARKER BALL



CODE NO.	SIZE	TYPE	DESCRIPTION
1636216	4"	ALL	4" Diameter sphere - Gas/Yellow 1405 - XR 5' Burial Depth Passive

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

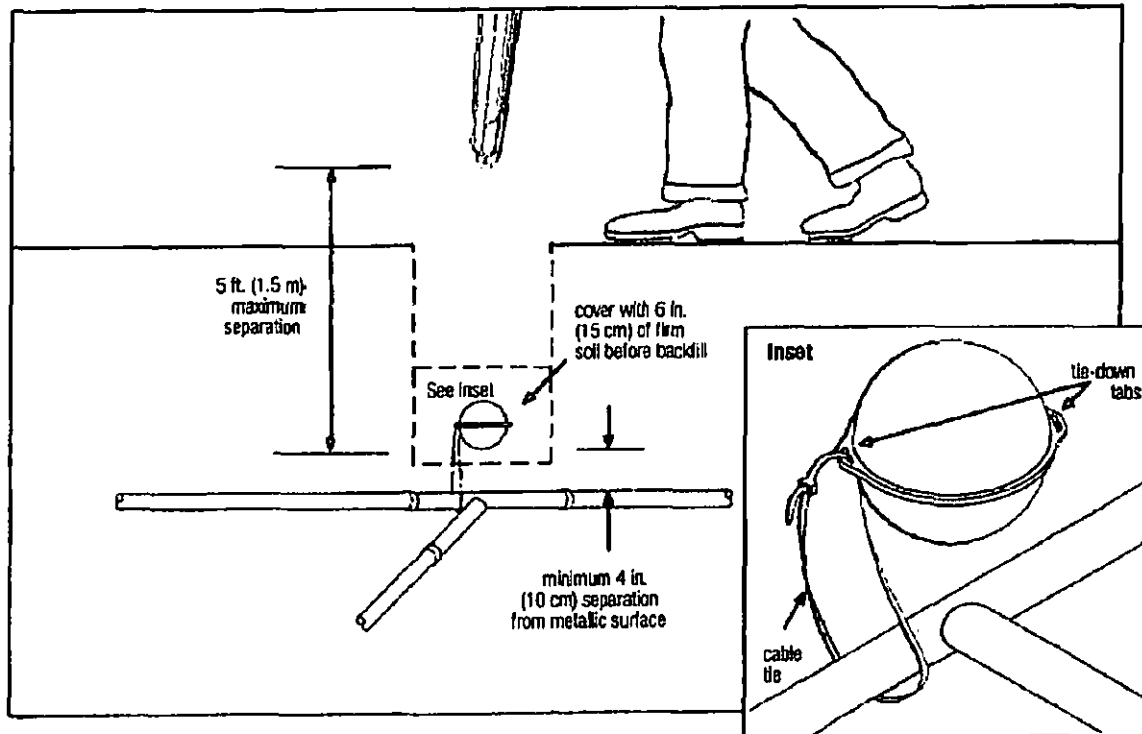
1.0 PURPOSE

- 1.1 Marker Balls provide an accurate, convenient, long lasting method of locating underground facilities. They are used to identify specific locations in PECO's underground gas system such as: valves, dead ends, leaks, damages or places where the pipe changes direction.
- 1.2 This standard applies to new installations and for situations where an existing facility is exposed.
- 1.3 This standard does not negate the requirements for installing tracer wire associated with plastic pipe.
- 1.4 Marker Balls SHALL not be used to locate foreign structures or reference points. Marker Balls installed by PECO Gas SHALL be placed as near as practical to the gas facility they are marking.

2.0 INSTALLATION GUIDELINES

- 2.1 Before placing the Marker Ball over the facility, decide if a tie down procedure is necessary to keep it in place. If so, secure the Marker Ball by inserting a cable tie through one, or both, tie down tabs on the ball and attach to the pipe.
- 2.2 If the facility to be located is metallic, the Marker Ball SHALL be installed at least 4" above the object with clean fill between the object to be located and the Marker Ball.
- 2.3 Marker Balls are not effective at depths greater than 5'. If the facility to be located has a depth greater than 5' then install the Marker Ball directly over the position of the object at approximately 4'6".
- 2.4 Minimum distance between Markers Balls is 3' 6".
- 2.5 Hand fill at least 6 inches of soil over the Marker Ball to prevent movement or damage during backfill.

2.6 Backfill the hole.

3.0 **SPECIFICATIONS**

- 3.1 Maximum depth of Marker Ball to be installed = 5' (Refer to Section 2.4)
- 3.2 Minimum vertical separation from facility = 4"
- 3.3 Minimum horizontal separation from facility = 4"
- 3.4 Minimum distance between Marker Balls = 3'6"

4.0 **DOCUMENTATION AND RECORDS**

- 4.1 Location of Marker Balls associated with gas services SHALL be available on GFRs. Field employees are required to capture the location of newly installed Marker Balls on DDIFs or the GFR Form.
- 4.2 Location of Marker Balls associated with gas mains SHALL be available on the quad maps. Field employees are required to capture the location of newly installed Marker Balls on DDIFs or on the sketch associated with the as-built.

5.0 APPLICATIONS – WHERE TO INSTALL

5.1 New Service Installations

- 5.1.1 Install Marker Ball on gas main approximately 4" from service tee. Install on the north/east side of the service tee.
- 5.1.2 Install Marker Ball at curbside/underground valves north/east over service pipe
- 5.1.3 Install Marker Ball where service crosses under curb or edge of roadway (or hole closest to curb or edge of paving for long side services)
- 5.1.4 Install Marker Ball at any point the service changes direction

5.2 New Stub Service Installations

- 5.2.1 Install Marker Ball on gas main approximately 4" from service tee. Install on the north/east side of the service tee
- 5.2.2 Install Marker Ball at end of stub/end cap
 - 5.2.2.1 If stub service serves a house without a house number (Lot/Block) the employee must check "Add sketch to gas quad" box on GFR

5.3 Retired Service Locations

- 5.3.1 Install Marker Ball at location of retirement
NOTE: A DDIF will need to be completed for the retirement

5.4 Existing Distribution Mains

- 5.4.1 Install Marker Ball at all leak locations (**excluding steel mains**) including cast iron/ductile iron joints, cast iron/ductile iron breaks, and areas where the gas main and/or coating was damaged.
- 5.4.2 Install Marker Ball at tie-in locations including plastic squeeze off locations, line stoppers, tapping tees (2" and larger), and mechanical couplings.
NOTE – If there is a conflict with the minimum spacing (3' 6"), then install Marker Ball at squeeze off, line stopper or tapping tee.
- 5.4.3 Install Marker Ball at locations where the main changes direction.
- 5.4.4 Install Marker Ball at dead ends/end caps.
- 5.4.5 Install two Marker Balls at emergency valve locations. The Marker Balls SHALL be installed two feet on either side of the valve outside of the valve box over the main.

- 5.4.6 Install Marker Ball at Nupi fittings (aka camera launch locations).
- 5.5 New Distribution Mains
- 5.5.1 Install Marker Ball every 150' along the new main (installed via direct bury).
- 5.5.2 Install Marker Ball at locations where the main (installed via direct bury) changes direction.
- 5.5.3 Install Marker Ball at dead ends/end caps (all installation methods).
- 5.5.4 Install Marker Ball to show the extents of the main that was installed via directional drill.
- 5.5.5 *Install two Marker Balls at emergency valve locations. The Marker Balls SHALL be installed two feet on either side of the valve outside of the valve box.*
- 5.6 Existing Transmission Lines
- 5.6.1 Install Marker Ball at any location where the transmission line is exposed.
NOTE: A copy of the PILRR SHALL be sent to Gas Asset Management & Performance.

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UNITED STATES US

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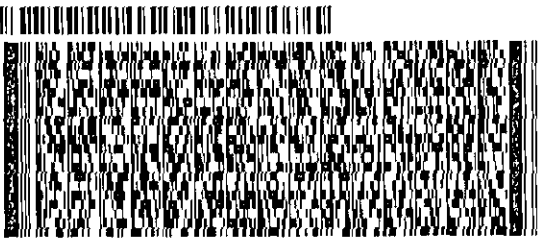
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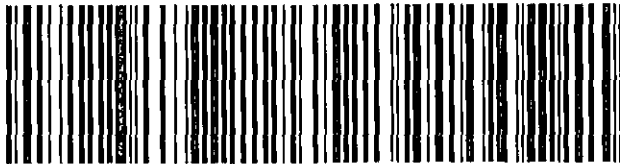
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