

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
Bureau of Investigation and Enforcement	:	
	:	Docket No. C-2020-3022293
v.	:	
	:	Electronically Filed
Golden Triangle Construction Co., Inc.	:	
	:	

**RESPONDENT GOLDEN TRIANGLE CONSTRUCTION CO., INC.’S
PETITION FOR EXTENSION OF TIME TO RESPOND TO FORMAL COMPLAINT**

Respondent Golden Triangle Construction Co., Inc. (“GTC”), by its undersigned counsel, files the within Petition for Extension of Time to Respond to Formal Complaint as follows:

1. On October 2, 2020, the Bureau of Investigation and Enforcement (“BI&E”) of the Pennsylvania Public Utility Commission initiated this action against GTC.

2. The Formal Complaint filed on behalf of the BI&E asserts that GTC violated several statutory provisions of the Underground Utility Line Protection Law, commonly known as the PA One Call Law, on October 3, 2018 while performing excavation work to install a water line for Pennsylvania American Water Company in Bethel Park, PA.

3. GTC’s responsive pleading to the BI&E’s Formal Complaint is currently due on or before October 22, 2020.

4. GTC now seeks an additional twenty (20) days to file its responsive pleading to the Formal Complaint. The requested extension is for the purpose of exploring a negotiated resolution to the claims asserted by the BI&E in the Formal Complaint.

5. Counsel for the BI&E does not oppose the requested twenty (20) day extension.

6. As such, GTC respectfully requests an additional twenty (20) days to file its responsive pleading to the BI&E Complaint. The requested extension would require GTC to file its responsive pleading on or before November 11, 2020.

WHEREFORE, the Respondent, Golden Triangle Construction Co., Inc., respectfully requests an extension of twenty (20) days to file its responsive pleading to the Formal Complaint.

MEYER, UNKOVIC & SCOTT LLP

By: /s/ Katelin J. Montgomery

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ATTORNEYS FOR DEFENDANT
GOLDEN TRIANGLE CONSTRUCTION
CO., INC.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the within **RESPONDENT GOLDEN TRIANGLE CONSTRUCTION CO., INC.'S PETITION FOR EXTENSION OF TIME TO RESPOND TO FORMAL COMPLAINT** was electronically filed and served upon all counsel of record by electronic mail, this 20th day of October 2020, at the following address:

Kourtney L. Myers
Prosecutor
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
400 North Street
Harrisburg, PA 17120
(717) 705-4366
komyers@pa.gov

MEYER, UNKOVIC & SCOTT LLP

By: */s/ Katelin J. Montgomery*

Chad I. Michaelson
Katelin J. Montgomery

ATTORNEYS FOR DEFENDANT GOLDEN
TRIANGLE CONSTRUCTION CO., INC.

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ORDER

AND NOW, to-wit, this _____ day of October 2020, upon consideration of Respondent Golden Triangle Construction Co., Inc.’s Petition for Extension of Time to Respond to Formal Complaint, it is hereby ORDERED, ADJUDGED and DECREED that said Petition is GRANTED. Respondent’s responsive pleading to the Formal Complaint shall be due on or before November 11, 2020.

BY:
