

**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  
SECOND 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. On October 20, 2020, GTC filed a Petition for Extension of Time seeking an additional twenty (20) days to respond to BI&E’s Formal Complaint. That same day, the Public Utility Commission granted GTC’s request and GTC’s responsive pleading to the BI&E’s Formal Complaint was then due November 12, 2020.

4. Due to the ongoing settlement negotiations, on November 12, 2020, GTC sought an additional twenty (20) days to file its responsive pleading to the Formal Complaint, which was also granted by the Commission. As such, GTC responsive pleading is now due on December 2, 2020.

5. Since the second extension request GTC and the BI&E have entered into a settlement agreement and are in the process of finalizing the Joint Settlement Petition and Statements in Support of same.

6. GTC now seeks an additional seven (7) days to finalize the Joint Settlement Petition and both Statements in Support to file and resolve the claims asserted by the BI&E in the Formal Complaint.

7. Counsel for the BI&E does not oppose the requested seven (7) day extension.

8. As such, GTC respectfully requests an additional seven (7) days for the parties to file the finalized Joint Settlement Petition and Statements in Support. The requested extension would require the parties to file these documents on or before December 9, 2020.

WHEREFORE, the Respondent, Golden Triangle Construction Co., Inc., respectfully requests an extension of seven (7) days to file its responsive pleading to the Formal Complaint.

MEYER, UNKOVIC & SCOTT LLP

By: /s/ Katelin J. Montgomery

Chad I. Michaelson  
[cim@muslaw.com](mailto:cim@muslaw.com)

Katelin J. Montgomery  
[kjm@muslaw.com](mailto:kjm@muslaw.com)

Meyer, Unkovic & Scott, LLP  
Henry W. Oliver Building  
535 Smithfield Street, Suite 1300  
Pittsburgh, PA 15222

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 1<sup>st</sup> day of December 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](mailto: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.