



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

February 28, 2022

Via Electronic Filing

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

Re: Pennsylvania Public Utility Commission,
Bureau of Investigation and Enforcement v.
Greater Johnstown Water Authority
Docket No. C-2022-
Formal Complaint

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Complaint in the above-referenced case on behalf of the Bureau of Investigation and Enforcement of the Pennsylvania Public Utility Commission. Copies have been served on the parties of record in accordance with the Certificate of Service.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. Myers', written in a cursive style.

Kourtney L. Myers
Prosecutor
PA Attorney ID No. 316494
(717) 705-4366
komyers@pa.gov

Enclosure

cc: Per Certificate of Service

NOTICE

A. You must file an Answer within 20 days of the date of service of this Complaint.

The date of service is the date as indicated at the top of the Secretarial Letter. *See* 52 Pa. Code §1.56(a). The Answer must raise all factual and legal arguments that you wish to claim in your defense, include the docket number of this Complaint, and be verified. You may file your Answer by mailing an original to:

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

Or, you may eFile your Answer using the Commission's website at www.puc.pa.gov. The link to eFiling is located under the Filing & Resources tab on the homepage. If your Answer is 250 pages or less, you are not required to file a paper copy. If your Answer exceeds 250 pages, you must file a paper copy with the Secretary's Bureau.

Additionally, please serve a copy on:

Kourtney L. Myers, Prosecutor
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
400 North Street
Harrisburg, PA 17210
komyers@pa.gov

B. If you fail to answer this Complaint within 20 days, the Bureau of Investigation and Enforcement will request that the Commission issue an Order imposing the requested relief.

C. You may elect not to contest this Complaint by paying the administrative penalty within 20 days. Send only a certified check or money order made payable to the "Commonwealth of Pennsylvania," with the docket number indicated, and mail to:

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

D. If you file an Answer which either admits or fails to deny the allegations of the Complaint, the Bureau of Investigation and Enforcement will request that the Commission issue an Order imposing the requested relief set forth in this Complaint.

E. If you file an Answer which contests the Complaint, the matter will be assigned to an Administrative Law Judge for hearing and decision. The Judge is not bound by the penalty set forth in the Complaint and may impose additional and/or alternative penalties as appropriate.

F. If you are a corporation, you must be represented by legal counsel. 52 Pa. Code § 1.21.

G. Alternative formats of this material are available for persons with disabilities by contacting the Commission's ADA Coordinator at 717-787-8714.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement	:	
	:	
v.	:	Docket No. C-2022-
	:	
Greater Johnstown Water Authority	:	

FORMAL COMPLAINT

NOW COMES the Bureau of Investigation and Enforcement (“I&E”) of the Pennsylvania Public Utility Commission (“Commission”), by its prosecuting attorneys, and files this Formal Complaint (“Complaint”) against Greater Johnstown Water Authority (“Respondent” or “GJWA”), pursuant to Sections 182.8(d) and 182.10 of the Underground Utility Line Protection Law, Act of October 30, 2017, P.L.806, No. 50 (hereinafter referred to as the “PA One Call Law”), 73 P.S. §§ 182.8(d) and 182.10.¹ In support of its Complaint, I&E respectfully represents the following:

I. Commission Jurisdiction and Authority

1. The Pennsylvania Public Utility Commission, with a mailing address of 400 North Street, Harrisburg, PA 17120, is a duly constituted agency of the Commonwealth of Pennsylvania empowered to, *inter alia*, enforce compliance by facility

¹ The purpose of the PA One Call Law is to protect the public health and safety by preventing excavation or demolition work from damaging underground lines used in providing electricity, communication, gas, propane, oil delivery, oil product delivery, sewage, water or other service; imposing duties upon the providers of such service and persons and other entities preparing drawings or performing excavation or demolition work; and prescribing penalties.

owners and other stakeholders pursuant to Section 182.10 of the PA One Call Law, 73 P.S. § 182.10.

2. Complainant is the Commission's Bureau of Investigation and Enforcement, which is the bureau established to take enforcement actions against public utilities and other entities subject to the Commission's jurisdiction pursuant to 66 Pa.C.S. § 308.2(a)(11); *See also Implementation of Act 129 of 2008; Organization of Bureaus and Offices*, Docket No. M-2008-2071852 (Order entered August 11, 2011) (delegating authority to initiate proceedings that are prosecutory in nature to I&E), including actions to enforce compliance of the PA One Call Law.

3. Complainant is represented by:

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

Michael L. Swindler
Deputy Chief Prosecutor
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
400 North Street
Harrisburg, PA 17120

4. Respondent is Greater Johnstown Water Authority with a main mailing address of 640 Franklin Street, Johnstown, PA 15901.

5. Respondent is a “facility owner” as that term is defined at 73 P.S. § 176 as it is an “authority . . . which owns or operates a line.”

6. A “line” or “facility” is defined as “an underground pipe used in . . . sewage, water or other service to one or more . . . consumers or customers of such service and the appurtenances thereto, regardless of whether such line or structure is located on land owned by a person or public agency or whether it is located within an easement or right-of-way.” 73 P.S. § 176.

7. Respondent, as a facility owner, is subject to the power and authority of this Commission pursuant to Section 182.10 of the PA One Call Law, 73 P.S. § 182.10, which requires facility owners to comply with the PA One Call Law.

8. Sections 182.8(d) and 182.10 of the PA One Call Law, 73 P.S. §§ 182.8(d) and 182.10, authorize the Commission to, *inter alia*, hear and determine complaints against facility owners for violations of the PA One Call Law and enforce the provisions of the PA One Call Law.

9. Section 182.10(a) of the PA One Call Law, 73 P.S. § 182.10(a), authorizes the Commission to impose administrative penalties on facility owners who violate the PA One Call Law. Section 182.10(b)(1)(i)-(ii) allows for the imposition of an administrative penalty not to exceed \$2,500 for each violation or if the violation results in injury, death, or property damage of \$25,000 or more, an administrative penalty not to exceed \$50,000.

10. Pursuant to the provisions of the applicable Commonwealth statutes, the Commission has jurisdiction over the subject matter of this complaint and the actions of Respondent related thereto.

II. Factual Background

Excavation Routine Ticket No. 20190531976

11. On Friday, February 22, 2019, at approximately 1:30 PM, Snyder Environmental Services (“Snyder Environmental”) placed an excavation routine ticket (“routine ticket”) with the Pennsylvania One Call System (“POCS”) at Serial No. 20190531976 to conduct an excavation with powered equipment. The routine ticket, deliveries of such ticket, and responses thereto are attached as I&E Exhibit 1A, 1B, and 1C, respectively.

12. The purpose of the excavation was to install new sanitary and storm sewer lines and laterals, manholes, and catch basins for the City of Johnstown. *See* I&E Exhibit 1A.

13. The routine ticket identified the work site as “Sherman Street” at the nearest intersections of Everhart Street and Strauss Avenue in Johnstown, Johnstown City, Pennsylvania 15901. *See* I&E Exhibit 1A.

14. Respondent is the facility owner of water and/or sewer lines and facilities that run underground in the vicinity of the work site.

15. An underground water or sewer line and facility is a “line” or “facility” as defined in 73 P.S. § 176.

16. Less than three (3) minutes later, the notification was delivered to GJWA through the POCS notifying Respondent of the excavation. *See* I&E Exhibit 1B.

17. GJWA's response to Snyder Environmental's routine ticket through the POCS was due by the end of the day on Tuesday, February 26, 2019. *See* I&E Exhibit 1A.

18. GJWA did not respond to Snyder Environmental's routine ticket through the POCS until Wednesday, February 27, 2019, at 7:30 AM. *See* I&E Exhibit 1C.

Excavation Routine Ticket No. 20190531977

19. On Friday, February 22, 2019, at approximately 1:30 PM, Snyder Environmental Services placed a routine ticket with the POCS at Serial No. 20190531977 to conduct an excavation with powered equipment. The routine ticket, deliveries of such ticket, and responses thereto are attached as I&E Exhibit 2A, 2B, and 2C, respectively.

20. The purpose of the excavation was to install new sanitary and storm sewer lines and laterals, manholes, and catch basins for the City of Johnstown. *See* I&E Exhibit 2A.

21. The routine ticket identified the work site as "Sherman Street" at the nearest intersections of Everhart Street and Strauss Avenue in Johnstown, Southmont Borough, Pennsylvania 15901. *See* I&E Exhibit 2A.

22. Respondent is the facility owner of water and/or sewer lines and facilities that run underground in the vicinity of the work site.

23. Less than three (3) minutes later, the notification was delivered to GJWA through the POCS notifying Respondent of the excavation. *See* I&E Exhibit 2B.

24. GJWA's response to Snyder Environmental's routine ticket through the POCS was due by the end of the day on Tuesday, February 26, 2019. *See* I&E Exhibit 2A.

25. GJWA did not respond to Snyder Environmental's routine ticket through the POCS until Wednesday, February 27, 2019, at 7:30 AM. *See* I&E Exhibit 2C.

Excavation Routine Ticket No. 20190660810

26. On Thursday, March 7, 2019, at approximately 9:20 AM, Snyder Environmental placed a routine ticket with the POCS at Serial No. 20190660810 to conduct an excavation with powered equipment. The routine ticket, deliveries of such ticket, and responses thereto are attached as I&E Exhibit 3A, 3B, and 3C, respectively.

27. The purpose of the excavation was to install new sanitary and storm sewer lines and laterals, manholes, and catch basins for GJWA. *See* I&E Exhibit 3A.

28. The routine ticket identified the work site as "Sherman Street" between the Sherman Street intersections with South Street and Everhart Street in Johnstown, Johnstown City, Pennsylvania 15901. *See* I&E Exhibit 3A.

29. Respondent is the facility owner of water and/or sewer lines and facilities that run underground in the vicinity of the work site.

30. Less than two (2) minutes later, the notification was delivered to GJWA through the POCS notifying Respondent of the excavation. *See* I&E Exhibit 3B.

31. GJWA's response to Snyder Environmental's routine ticket through the POCS was due by the end of the day on Monday, March 11, 2019. *See* I&E Exhibit 3A.

32. GJWA did not respond to Snyder Environmental's routine ticket through the POCS until Friday, March 15, 2019, at 7:40 AM. *See* I&E Exhibit 3C.

III. Violations

33. Paragraphs 1-32 above are incorporated herein as if stated in their entirety. GJWA failed to respond to the routine tickets at POCS Serial Nos. 20190531976, 20190531977, and 20190660810 by the end of the second business day following receipt of the notifications by the POCS.

If proven, this is a violation of Section 177(5)(v) of the PA One Call Law, 73 P.S. § 177(5)(v) (three counts), requiring a facility owner to “respond to all notices through the One Call System . . . 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.”

The Bureau of Investigation and Enforcement's proposed administrative penalty for this violation is \$500 for a total administrative penalty of \$1,500.

WHEREFORE, the Bureau of Investigation and Enforcement of the
Pennsylvania Public Utility Commission respectfully requests that the Commission:

- (a) Find Respondent to be in violation of the PA One Call Law at 73 P.S. § 177(5)(v)(three counts);
- (b) Impose a total administrative penalty upon Respondent in the amount of One Thousand Five Hundred Dollars (\$1,500); and
- (c) Order such other remedies as the Commission may deem appropriate.

Respectfully submitted,



Kourtney L. Myers
Prosecutor
PA Attorney ID No. 316494

Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
(717) 705-4366
komyers@pa.gov

Date: February 28, 2022

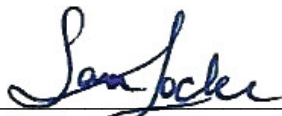
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
Bureau of Investigation and Enforcement	:	
	:	
v.	:	Docket No. C-2022-
	:	
Greater Johnstown Water Authority	:	

VERIFICATION

I, Sara Andrade-Locke, Damage Prevention Supervisor, Damage Prevention Section, Bureau of Investigation and Enforcement, hereby state that the facts above set forth are true and correct to the best of my knowledge, information, and belief and that I expect the Bureau will be able to prove the same at any hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: February 28, 2022



Sara Andrade-Locke
Damage Prevention Supervisor
Damage Prevention Section
Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

I&E
Exhibit 1A

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

Serial Number--[20190531976]-[000] Channel#--[1328AWEB][0136][2019-01]

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

County--[CAMBRIA] Municipality--[JOHNSTOWN CITY]

Work Site--[SHERMAN ST]

Nearest Intersection--[EVERHART]

Second Intersection--[STRAUSS]

At Intersection--[N] Between Intersections--[N] Site Marked in White--[N]

Subdivision--[]

Location Information--

[WE WILL BE INSTALLING NEW SANITARY AND STORM SEWER LINES AND LATERALS.
ALONG WITH NEW MANHOLES AND CATCH BASINS. PLEASE MARK ENTIRE AREA.]

Caller Lat/Lon--[]

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

[40.315323/-78.917669,40.315492/-78.917255,40.313666/-78.915925,
40.313604/-78.916472]

Attachments--[http://www.pa811.org/attachments/20190531976]

Type of Work--[SEWER LINE INSTALATION] Depth--[13]

Extent of Excavation--[700 FT] Method of Excavation--[DIGGING]

Equip Type--[EXCAVATOR]

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

Private Front--[X] Rear--[X] Left--[X] Right--[X]

Lawful Start Dates--[27-Feb-19] thru [08-Mar-19] Response Due Date--[26-Feb-19]

Scheduled Excavation Date--[27-Feb-19] Dig Time--[0700] Duration--[1 YEAR]

Caller--[CHAD DURIEZ]

Caller Phone--[304-240-5607]

Excavator--[SNYDER ENVIRONMENTAL SERVICES]

Address--[270 INDUSTRIAL BLVD]

City--[KEARNEYSVILLE] State--[WV] Zip--[25430]

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

Email--[CDURIEZ@SNYDERENV.COM]

Work For--[CITY OF JOHNSTOWN]

Onsite Contact--[CHAD DURIEZ]

Onsite Contact Phone--[304-240-5607]

Best Time to Call--[ANYTIME]

Onsite Contact Email--[CDURIEZ@SNYDERENV.COM]

Job Number--[19015]

Prepared--[22-Feb-19] at [1330] by [CHADSES]

Remarks--

[]

AL 0 AL =PEOPLES GAS GJW0 GJW=GR JOHNSTOWN WA JOH0 JOH=JOHNSTOWN C/S
JRA0 JRA=JT REDEVEL AUTH LV 0 LV =PENELEC TF 0 TF =VERIZON NORTH

Serial Number--[20190531976]-[000]

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I&E
Exhibit 1B

Ver	CDC	Name	To	Time	Seq	Type
0	AL	PEOPLES GAS COMPANY LLC	AL	02/22/2019 13:32:20	280	MAIL
0	GJW	GREATER JOHNSTOWN WATER AUTHO	GJW	02/22/2019 13:32:21	8	MAIL
0	JOH	JOHNSTOWN CITY OF/REGIONAL SE	JOH	02/22/2019 13:32:23	3	MAIL
0	LV	PENNSYLVANIA ELEC CO	LV	02/22/2019 13:32:24	179	MAIL
0	TF	VERIZON NORTH	TF	02/22/2019 13:32:25	93	MAIL
0	JRA	JOHNSTOWN REDEVELOPMENT AUTHO	JRA	02/22/2019 13:32:52	1	MAIL

I&E
Exhibit 1C

Ver	CDC	Name	Response	Time	Respondent
0	AL	PEOPLES GAS COMPANY LLC	3-FIELD MARKED	02/25/2019 15:55:04	PNG-WEBSVC
0	GJW	GREATER JOHNSTOWN WATER A	3-FIELD MARKED	02/27/2019 07:30:16	SH-WEB
0	GJW	GREATER JOHNSTOWN WATER A	9-NO RESPONSE**	02/27/2019 00:19:19	-KARL
0	JOH	JOHNSTOWN CITY OF/REGIONA	1-CLEAR NO FACIL	02/25/2019 07:15:49	JC-WEB
0	JRA	JOHNSTOWN REDEVELOPMENT A	1-CLEAR NO FACIL	02/26/2019 07:16:56	JC-WEB
0	LV	PENNSYLVANIA ELEC CO	1-CLEAR NO FACIL	02/26/2019 14:21:03	CUS-WEBSVC
0	TF	VERIZON NORTH	1-CLEAR NO FACIL	02/22/2019 13:38:45	PRA-WEBSVC

I&E
Exhibit 2A

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

Serial Number--[20190531977]-[000] Channel#--[1328AWEB][0136][2019-01]
Message Type--[NEW][EXCAVATION][ROUTINE]

County--[CAMBRIA] Municipality--[SOUTHMONT BORO]
Work Site--[SHERMAN ST]
Nearest Intersection--[EVERHART]
Second Intersection--[STRAUSS]
At Intersection--[N] Between Intersections--[N] Site Marked in White--[N]
Subdivision--[]

Location Information--
[WE WILL BE INSTALLING NEW SANITARY AND STORM SEWER LINES AND LATERALS.
ALONG WITH NEW MANHOLES AND CATCH BASINS. PLEASE MARK ENTIRE AREA.]
Caller Lat/Lon--[]

Mapped Type--[P] Mapped Lat/Lon--
[40.315323/-78.917669,40.315492/-78.917255,40.313666/-78.915925,
40.313604/-78.916472]

Attachments--[http://www.pa811.org/attachments/20190531977]
Type of Work--[SEWER LINE INSTALATION] Depth--[13]

Extent of Excavation--[700 FT] Method of Excavation--[DIGGING]
Equip Type--[EXCAVATOR]
Street--[X] Sidewalk--[X] Pub Prop--[X] Pvt Prop--[X] Other--[]
Private Front--[X] Rear--[X] Left--[X] Right--[X]

Lawful Start Dates--[27-Feb-19] thru [08-Mar-19] Response Due Date--[26-Feb-19]
Scheduled Excavation Date--[27-Feb-19] Dig Time--[0700] Duration--[1 YEAR]

Caller--[CHAD DURIEZ]
Caller Phone--[304-240-5607]
Excavator--[SNYDER ENVIRONMENTAL SERVICES]
Address--[270 INDUSTRIAL BLVD]
City--[KEARNEYSVILLE] State--[WV] Zip--[25430]
FAX--[] Caller Type--[B]
Email--[CDURIEZ@SNYDERENV.COM]
Work For--[CITY OF JOHNSTOWN]
Onsite Contact--[CHAD DURIEZ]
Onsite Contact Phone--[304-240-5607]
Best Time to Call--[ANYTIME]
Onsite Contact Email--[CDURIEZ@SNYDERENV.COM]
Job Number--[19015]

Prepared--[22-Feb-19] at [1330] by [CHADSES]
Remarks--
[]

AL 0 AL =PEOPLES GAS GJW0 GJW=GR JOHNSTOWN WA LV 0 LV =PENELEC
STM0 STM=SOUTHMONT BORO TF 0 TF =VERIZON NORTH

Serial Number--[20190531977]-[000]
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I&E
Exhibit 2B

Ver	CDC	Name	To	Time	Seq	Type
0	AL	PEOPLES GAS COMPANY LLC	AL	02/22/2019 13:32:20	281	MAIL
0	GJW	GREATER JOHNSTOWN WATER AUTHO	GJW	02/22/2019 13:32:22	9	MAIL
0	LV	PENNSYLVANIA ELEC CO	LV	02/22/2019 13:32:25	180	MAIL
0	TF	VERIZON NORTH	TF	02/22/2019 13:32:26	94	MAIL
0	STM	SOUTHMONT BOROUGH	STM	02/22/2019 13:32:28	1	MAIL

I&E
Exhibit 2C

Ver	CDC	Name	Response	Time	Respondent
0	AL	PEOPLES GAS COMPANY LLC	1-CLEAR NO FACIL	02/26/2019 08:10:04	PNG-WEBSVC
0	GJW	GREATER JOHNSTOWN WATER A	3-FIELD MARKED	02/27/2019 07:30:26	SH-WEB
0	GJW	GREATER JOHNSTOWN WATER A	9-NO RESPONSE**	02/27/2019 00:19:19	-KARL
0	LV	PENNSYLVANIA ELEC CO	1-CLEAR NO FACIL	02/26/2019 13:57:47	CUS-WEBSVC
0	STM	SOUTHMONT BOROUGH	9-NO RESPONSE**	02/27/2019 00:19:19	-KARL
0	TF	VERIZON NORTH	1-CLEAR NO FACIL	02/22/2019 13:38:45	PRA-WEBSVC

I&E
Exhibit 3A

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

Serial Number--[20190660810]-[000] Channel#--[0919AWEB][0043][2019-01]
Message Type--[NEW][EXCAVATION][ROUTINE]

County--[CAMBRIA] Municipality--[JOHNSTOWN CITY]
Work Site--[SHERMAN ST]
Nearest Intersection--[SOUTH ST]
Second Intersection--[EVERHART]
At Intersection--[N] Between Intersections--[Y] Site Marked in White--[N]
Subdivision--[]

Location Information--
[WE WILL BE INSTALLING NEW SANITARY AND STORM SEWER LINES AND LATERALS.
ALONG WITH NEW MANHOLES AND CATCH BASINS. PLEASE MARK ENTIRE AREA.]
Caller Lat/Lon--[]

Mapped Type--[P] Mapped Lat/Lon--
[40.317278/-78.919197,40.317476/-78.918628,40.315154/-78.916891,
40.314962/-78.917497]

Attachments--[http://www.pa811.org/attachments/20190660810]
Type of Work--[SEWER LINE INSTALATION] Depth--[13]
Extent of Excavation--[800 FT] Method of Excavation--[DIGGING]

Equip Type--[EXCAVATOR]
Street--[X] Sidewalk--[X] Pub Prop--[X] Pvt Prop--[X] Other--[]
Private Front--[X] Rear--[X] Left--[X] Right--[X]

Lawful Start Dates--[12-Mar-19] thru [21-Mar-19] Response Due Date--[11-Mar-19]
Scheduled Excavation Date--[12-Mar-19] Dig Time--[0700] Duration--[1 YEAR]

Caller--[CHAD DURIEZ]
Caller Phone--[304-240-5607]
Excavator--[SNYDER ENVIRONMENTAL SERVICES]
Address--[270 INDUSTRIAL BLVD]
City--[KEARNEYSVILLE] State--[WV] Zip--[25430]
FAX--[] Caller Type--[B]
Email--[CDURIEZ@SNYDERENV.COM]
Work For--[CITY OF JOHNSTOWN]
Onsite Contact--[CHAD DURIEZ]
Onsite Contact Phone--[304-240-5607]
Best Time to Call--[ANYTIME]
Onsite Contact Email--[CDURIEZ@SNYDERENV.COM]
Job Number--[19015]

Prepared--[07-Mar-19] at [0920] by [CHADSES]
Remarks--
[]

AL 0 AL =PEOPLES GAS GJW0 GJW=GR JOHNSTOWN WA JOH0 JOH=JOHNSTOWN C/S
LV 0 LV =PENELEC TF 0 TF =VERIZON NORTH

Serial Number--[20190660810]-[000]
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I&E
Exhibit 3B

Ver	CDC	Name	To	Time	Seq	Type
0	TF	VERIZON NORTH	TF	03/07/2019 09:21:25	24	MAIL
0	LV	PENNSYLVANIA ELEC CO	LV	03/07/2019 09:21:31	59	MAIL
0	AL	PEOPLES GAS COMPANY LLC	AL	03/07/2019 09:21:52	126	MAIL
0	GJW	GREATER JOHNSTOWN WATER AUTHO	GJW	03/07/2019 09:21:53	4	MAIL
0	JOH	JOHNSTOWN CITY OF/REGIONAL SE	JOH	03/07/2019 09:21:54	4	MAIL

I&E
Exhibit 3C

Ver	CDC	Name	Response	Time	Respondent
0	AL	PEOPLES GAS COMPANY LLC	3-FIELD MARKED	03/11/2019 15:55:04	PNG-WEBSVC
0	GJW	GREATER JOHNSTOWN WATER A	3-FIELD MARKED	03/15/2019 07:40:10	SH-WEB
0	GJW	GREATER JOHNSTOWN WATER A	9-NO RESPONSE**	03/12/2019 00:10:24	-KARL
0	JOH	JOHNSTOWN CITY OF/REGIONA	1-CLEAR NO FACIL	03/08/2019 07:13:07	JC-WEB
0	LV	PENNSYLVANIA ELEC CO	1-CLEAR NO FACIL	03/08/2019 12:41:31	CUS-WEBSVC
0	TF	VERIZON NORTH	1-CLEAR NO FACIL	03/07/2019 09:23:46	PRA-WEBSVC

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
Bureau of Investigation and Enforcement	:	
	:	
v.	:	Docket No. C-2022-
	:	
Greater Johnstown Water Authority	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing **Formal Complaint** in the manner and upon the parties listed below, in accordance with the requirements of 52 Pa. Code §§ 1.54 (relating to service by a party).

Served via Electronic Mail

James M. Kukura, Jr.
Assistant Manager of Water and Sewer
Greater Johnstown Water Authority
640 Franklin Street
Johnstown, PA 15901
jkukura@rdm-gjwa.com



Kourtney L. Myers
Prosecutor
PA Attorney ID No. 316494

Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
(717) 705-4366
komyers@pa.gov

Date: February 28, 2022