

August 4, 2023

VIA E-FILING

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


Re: Application of Crown Castle Fiber for Approval for the Alteration of the Crossing AAR #517937M by the Installation of Underground Fiber Optic Cable where St. Johns Church Road (SR 2029) Crosses at Grade the Tracks of Norfolk Southern Railroad Located in Mechanicsburg in Cumberland County, Docket No. A-2023-3041616

Dear Secretary Chiavetta:

Enclosed please find the Notice for of Appearance of Tamara R. Bernstein and the Objection to Approval of the application in the above-referenced proceeding. Service of this filing is being made via electronic mail, unless otherwise indicated.

Should you have any questions concerning this filing, please feel free to contact me.

Very truly yours,

DocuSigned by:

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Tamara R. Bernstein
Counsel for UGI Utilities, Inc. – Gas
Division

Enclosure: Objection to Approval of Application
 Certificate of Service

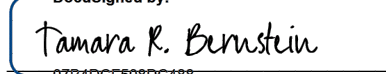
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Crown Castle Fiber for :
Approval for the Alteration of the Crossing :
AAR #517937M by the Installation of :
Underground Fiber Optic Cable where St. :
Johns Church Road (SR 2029) Crosses at :
Grade the Tracks of Norfolk Southern : Docket No. A-2023-3041616
Railroad Located in Mechanicsburg in :
Cumberland County. :

NOTICE OF APPEARANCE

Please enter my appearance on behalf of the applicant UGI Utilities, Inc. – Gas Division in the above-captioned matter. On the basis of this notice, I request a copy of each document filed hereafter by any party or issued by the Commission in this matter.

Respectfully submitted,

By: 

Tamara R. Bernstein

(Attorney I.D. 316360)

460 North Gulph Road

King of Prussia, PA 19406

bernsteint@ugicorp.com

Office: (610) 768-3628

Counsel for UGI Utilities, Inc. – Gas
Division

**BEFORE THE
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OBJECTION TO APPROVAL

AND NOW comes Tamara R. Bernstein, Esq., counsel for UGI Utilities, Inc. – Gas Division, and objects to the approval of the above-referenced application as follows:

1. UGI Utilities, Inc. – Gas Division (“UGI”) is a public utility that provides gas service to approximately 677,000 retail customers located in portions of 46 eastern and central Pennsylvania counties.
2. UGI’s principal address is 1 UGI Drive, Denver, PA, 17517
3. The name and address of UGI’s attorney is:

Tamara R. Bernstein
(Attorney I.D. 316360)
460 North Gulph Road
King of Prussia, PA 19406
bernsteint@ugicorp.com
Office: (610) 768-3628

4. UGI objects to the approval of the above-referenced application for the following reasons

:

- a. The proposed crossing is very close to, and may impact, UGI's four-inch (4") and six-inch (6") gas main which is located on the same side of St. Johns Church Road (SR 2029) as Crown Castle Fiber's proposed crossing.
 - b. UGI requires further separation between Crown Castle Fiber's proposed facilities and UGI's existing facilities.
 - c. Damage to UGI's facilities could result in a major environmental impact and unplanned termination of service to UGI's customers.
 - d. UGI's facilities are not shown on Crown Castle Fiber's proposed construction plans.
5. UGI notes that Crown Castle Fiber is working cooperatively with UGI to update its plans so that UGI's facilities are properly accounted for in its construction plans and construction can be completed in a safe manner.

WHEREFORE, Crown Castle Fiber should be required to amend its application with construction plans which properly show UGI's facilities.

Respectfully submitted,

DocuSigned by:
By: Tamara R. Bernstein
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Tamara R. Bernstein
(Attorney I.D. 316360)
460 North Gulph Road
King of Prussia, PA 19406
bernsteint@ugicorp.com
Office: (610) 768-3628
Counsel for UGI Utilities, Inc. – Gas
Division

Dated: July 27, 2023

**BEFORE THE
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VERIFICATION

I, Stephen C. Bateman, P.E., Manager – Area Engineering, for UGI Utilities, Inc. – Gas Division, 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 to be able to prove the same at a 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).

DocuSigned by:

Stephen Bateman

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Stephen C. Bateman

Date: July 27, 2023

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CERTIFICATE OF SERVICE

I hereby certify that I have, this 27 day of July, 2023 served a true and correct copy of the foregoing document in the manner and upon the persons listed below in accordance with requirements of 52 Pa. Code §1.54 (relating to service by a participant):

VIA FIRST CLASS MAIL:

Cumberland County
1 Courthouse Square
Carlisle, PA 17013
Attn: Planning Department

Level3 Communications, LLC
18 Hawkins Farm Road
Allentown, NJ 08501
Attn: Jeffery Penney

PPL EU
1047 N. Plymouth St
Allentown, PA 18109-1539

Pennsylvania American Water
200 E. Canal Street
Hummelstown, PA 17036
Attn: Angela Marcus

Verizon PA
900 Race St., 6th Floor
Philadelphia, PA 19107
Attn: Matt Kehr

Qwest Communications
2011 Hartel Street
Levittown, PA 19057
Attn: Mark Harley

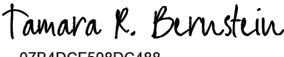
Comcast Cablevision
1351 S. Columbus Ave.
Philadelphia, PA 19147
Attn: Jack Clayton

PennDOT District 8
2140 Herr Street
Harrisburg, PA 17103
Attn: Permits

Mechanicsburg Borough
36 W. Allen St.
Mechanicsburg, PA 17055
Attn: Planning Commission

Norfolk Southern Corp
1200 Peachtree St. N.E., 12th Floor
Atlanta, GA 30309
Attn: Permits

Crown Castle Fiber
202 Titus Ave.
Warrington, PA 18976
Attn: Michelle Lenig

DocuSigned by:

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Tamara R. Bernstein