



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

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

November 21, 2023

**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.  
Columbia Gas of Pennsylvania, Inc.  
Docket No. C-2023-  
**Formal Complaint (Non-Proprietary and Proprietary)**

Dear Secretary Chiavetta:

Enclosed for electronic filing is the **Non-Proprietary** version of the **Formal Complaint** of the Bureau of Investigation and Enforcement (“I&E”) of the Pennsylvania Public Utility Commission in the above-referenced matter. The **Proprietary** version has been submitted to the Secretary’s Bureau via their ShareFile.

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 blue ink, appearing to read 'Colby B. Widdowson', is written over a light blue circular stamp.

Colby B. Widdowson  
Prosecutor  
Bureau of Investigation & Enforcement  
PA Attorney ID No. 326185  
(717) 787-2139  
[cwiddowson@pa.gov](mailto:cwiddowson@pa.gov)

CBW/jfm  
Enclosures

cc: Per Certificate of Service  
Michael L. Swindler, Deputy Chief Prosecutor (via email - [mwindler@pa.gov](mailto:mwindler@pa.gov))  
Brent Killian, Supervisor, Electric Safety Division (via email - [ckillian@pa.gov](mailto:ckillian@pa.gov))  
Matthew Matse, Electric Safety Division (via email - [mmatse@pa.gov](mailto:mmatse@pa.gov))

## NOTICE

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

The date of service is the mailing 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. The Answer must be submitted by efileing with the Secretary of the Commission by opening an efileing account through the Commission's website and accepting eservice at <http://www.puc.state.pa.us/efiling/default.aspx>. If your filing contains confidential material, you are required to file by overnight delivery to ensure the timely filing of your submission to:

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

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 electronically serve a copy on:**

Colby B. Widdowson, Prosecutor  
Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
[cwiddowson@pa.gov](mailto:cwiddowson@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 civil penalty and performing the requested relief within 20 days. Send only a certified check or money order made payable to the "Commonwealth of Pennsylvania," with the docket number indicated, and mailed to:

Rosemary Chiavetta,  
Secretary Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
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. *See* 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,	:	
Complainant	:	
	:	
v.	:	Docket No. C-2023-
	:	
Columbia Gas of Pennsylvania, Inc.,	:	
Respondent	:	

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**FORMAL COMPLAINT**

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**(NON-PROPRIETARY VERSION)**

NOW COMES the Pennsylvania Public Utility Commission, Bureau of Investigation and Enforcement (“I&E”), by its prosecuting attorneys, pursuant to Section 701 of the Public Utility Code, 66 Pa.C.S. § 701, and files this Formal Complaint (“Complaint”) against Columbia Gas of Pennsylvania, Inc. (“Columbia,” “Company,” or “Respondent”) alleging violations of the Public Utility Code, Pennsylvania Code, and Code of Federal Regulations relating to visually unacceptable socket fusions at Tropical Avenue, Pittsburgh, Pennsylvania. In support of its Formal Complaint, I&E alleges the following:

**I. COMMISSION JURISDICTION AND AUTHORITY**

1. The Pennsylvania Public Utility Commission (“Commission” or “PUC”), with a mailing address of the Commonwealth Keystone Building, 400 North Street, Harrisburg, PA 17120, is a duly constituted agency of the Commonwealth of

Pennsylvania empowered to regulate public utilities within the Commonwealth pursuant to the Public Utility Code, 66 Pa.C.S. §§ 101, et seq. (“Code”).

2. Complainant is the Commission’s Bureau of Investigation and Enforcement (“I&E”), 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 (August 11, 2011) (delegating authority to initiate proceedings that are prosecutory in nature to I&E).

3. Complainant’s prosecuting attorneys are as follows:

Colby B. Widdowson  
Prosecutor  
[cwiddowson@pa.gov](mailto:cwiddowson@pa.gov)  
(717) 787-2139

Michael L. Swindler  
Deputy Chief Prosecutor  
[mswindler@pa.gov](mailto:mswindler@pa.gov)

Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

4. Respondent is owned by NiSource, with a principal place of business of 121 Champion Way, Suite 100, Canonsburg, PA 15317.

5. Section 501(a) of the Code, 66 Pa.C.S. § 501(a), authorizes and obligates the Commission to execute and enforce the provisions of the Code.

6. Section 701 of the Code, 66 Pa.C.S. § 701, authorizes the Commission,

*inter alia*, to hear and determine complaints against public utilities for violations of any law or regulation that the Commission has jurisdiction to administer or enforce.

7. Section 3301(c) of the Code, 66 Pa.C.S. § 3301(c), which is specific to gas pipeline safety violations, authorizes the Commission to impose civil penalties on any person or corporation, defined as a public utility, who violates any provisions of the Code or any regulation or order issued thereunder governing the safety of pipeline or conduit facilities in the transportation of natural gas, flammable gas, or gas which is toxic or corrosive. Section 3301(c) further provides that a civil penalty of up to Two Hundred Thousand Dollars (\$200,000) per violation for each day that the violation persists may be imposed, except that for any related series of violations, the maximum civil penalty shall not exceed Two Million Dollars (\$2,000,000) or the penalty amount provided under Federal pipeline safety laws, whichever is greater.

8. Civil penalties for violations of Federal pipeline safety laws and regulations are adjusted annually to account for changes in inflation pursuant to the Federal Civil Penalties Inflation Adjustment Act Improvements Act of 2015, Pub. L. 114-74, § 701, 129 Stat. 599, 28 U.S.C. § 2461 note (Nov. 2, 2015) (amending the Federal Civil Penalties Inflation Adjustment Act of 1990). The applicable adjustment made by the U.S. Department of Transportation's Pipeline and Hazardous Materials Safety Administration ("PHMSA") occurred on July 31, 2019 and revised the maximum civil penalty to Two Hundred Eighteen Thousand, Six Hundred Forty-Seven Dollars (\$218,647.00) for each violation for each day the violation continues, with a maximum penalty not to exceed Two Million, One Hundred Eighty-Six Thousand, Four Hundred Sixty-Five Dollars

(\$2,186,465.00) for a related series of violations. 84 Fed. Reg. 37059 (July 31, 2019).

9. Pursuant to Section 59.33(b) of the Commission’s regulations, 52 Pa. Code § 59.33(b), I&E’s Pipeline Safety Division (“I&E-Safety”) has the authority to enforce Federal pipeline safety laws and regulations set forth in 49 U.S.C.A. §§ 60101-60503 and as implemented at 49 CFR Parts 191-193, 195 and 199. The Federal pipeline safety laws and regulations prescribe the minimum safety standards for all natural gas and hazardous liquid public utilities in the Commonwealth.

10. Respondent is a “public utility” as that term is defined at 66 Pa.C.S. § 102,<sup>1</sup> as it is engaged in providing public utility service as a natural gas distribution company (“NGDC”) to the public for compensation.

11. Respondent, in providing natural gas distribution service to the public for compensation, is subject to the power and authority of this Commission pursuant to Section 501(c) of the Code, 66 Pa.C.S. § 501(c), which requires a public utility to comply with Commission regulations and orders, including Federal pipeline safety laws and regulations.

12. Pursuant to the provisions of the applicable Commonwealth and Federal statutes and regulations, the Commission has jurisdiction over the subject matter and the actions of Respondent related thereto.

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<sup>1</sup> 66 Pa.C.S. § 102 defines “public utility” as “[a]ny person or corporations now or hereafter owning or operating in this Commonwealth equipment or facilities for . . . [p]roducing, generating, transmitting, distributing or furnishing natural or artificial gas, electricity, or steam for the production of light, heat, or power to or for the public for compensation.”

## II. BACKGROUND

13. Respondent is owned by NiSource and is one of the largest natural gas distribution companies in Pennsylvania.

14. Respondent has approximately 430,000 customers in 26 counties across the Commonwealth.

15. As of December 31, 2021, approximately 5,022 miles of Columbia's 7,715 miles of mainline, or 65 percent, was comprised of plastic mainline.

16. On or about July 27, 2020, Respondent's customer located at 1115 Tropical Avenue, Pittsburgh, PA, reported an odor of natural gas.

17. The source of the leak at 1115 Tropical Avenue was excavated and it was found that a failed socket fusion, connecting the service line to the riser, near the house, was the source of the leak.

18. Socket fusion is accomplished by heating the inside of a fitting with a properly sized plate, and simultaneously heating the outside of a cleaned and prepared plastic pipe to accept the fitting. When both pieces reach a melting temperature, the pipe is inserted and melted to the fitting.

19. The service line at 115 Tropical Avenue was installed in 2019 as part of a larger main line replacement project in the area (hereinafter referred to as "Tropical Avenue Project").

20. The Tropical Avenue Project started on or about May 14, 2019 and was completed on or about December 18, 2019.

21. The Tropical Avenue Project included the installation of 5,840 feet of 2"

medium density plastic pipe, 2,680 feet of 4" medium density plastic pipe, and 372 service lines and increased the maximum allowable operating pressure.

22. Respondent hired a contractor, Infrasource, a Quanta Services Company, to perform the main and service construction for the Tropical Avenue Project.

23. Respondent's records indicated the failed fusion at 1115 Tropical Avenue was completed by an Infrasource employee, **\*START CONFIDENTIAL\*** [REDACTED] **\*END CONFIDENTIAL\*** ("Employee A") who completed fifty-nine (59) socket fusions on the Tropical Avenue Project.

24. After consultation and direction from I&E-Safety, Respondent conducted a set of integrity validation digs, with the intent to determine the extent of the socket fusion quality for in-service gas service lines on the Tropical Avenue Project.

25. These digs occurred on or about November 23, 2020 and November 24, 2020.

26. The November 23, 2020 digs resulted in the visual inspection of eight (8) socket fusions and the following results were found:

- a) Socket fusion located at 830 Tropical Avenue, passed visual inspection, but the fusion was not labeled. See attached I&E Exhibit 1;
- b) Socket fusion located at 933 Tropical Avenue, passed visual inspection, but the fusion was not labeled on both sides. See attached I&E Exhibit 2;

- c) Socket fusion located at 973 Tropical Avenue, passed visual inspection, but the fusion was not labeled. See attached I&E Exhibit 3;
- d) Socket fusion located at 977 Tropical Avenue, failed visual inspection because it was mitered and the fusion was not labeled. See attached I&E Exhibit 4;
- e) Socket fusion located at 1007 Tropical Avenue, failed visual inspection because it was mitered and the fusion was not labeled. See attached I&E Exhibit 5;
- f) Socket fusion located at 1108 Tropical Avenue, passed visual inspection, but the fusion was not labeled. See attached I&E Exhibit 6; and
- g) Socket fusion located at 1124 Tropical Avenue, passed visual inspection and was properly marked, but the fusion was performed by **\*START CONFIDENTIAL\*** [REDACTED] **\*END CONFIDENTIAL\*** (“Employee B”) who was not qualified to perform this socket fusion. See attached I&E Exhibit 7.

27. Employee B failed an Operator Qualification plan requalification test in July of 2019, resulting in his disqualification from performing socket fusions.

28. In total, Employee B performed two socket fusions at a time that he was disqualified from performing those fusions.

29. The November 24, 2020, digs resulted in the inspection of five (5) socket fusions and the following results were found:

- a) Socket fusion located at 834 Tropical Avenue did not pass visual inspection because of a lack of cold ring impression and the fusion was not labeled. See attached I&E Exhibit 8;
- b) Socket fusion located at 838 Tropical Avenue did not pass visual inspection because of a lack of cold ring impression and the fusion was not labeled. See attached I&E Exhibit 9; and
- c) Socket fusion located at 842 Tropical Avenue did not pass visual inspection and the fusion was not properly labeled as the labeled fusions did not match the fuser on record. See attached I&E Exhibit 10.

30. Based upon the results of the validation digs, Respondent and I&E-Safety determined that more socket fusions would require excavation for inspection as visually unacceptable fusions were found, along with incorrect records.

31. Respondent and Safety Division deemed it necessary to excavate and inspect all 59 socket fusions made by Employee A and upon investigation of these 59 fusions, it was found that additional Infrasource personnel had completed visually unacceptable fusions, as well as additional incorrect records and labeling.

32. Based upon the additional issues found, Respondent continued investigating socket fusions made on the entire Tropical Avenue Project, conducting further investigative digs.

33. These subsequent investigative digs excavated fusion joints in the street at the main line to inspect the saddle tee fusion, as well as socket fusions connecting to the service line. The service lines were also excavated at, or near the meter to inspect the fusion connecting the service line to the meter riser.

34. The subsequent investigative digs discovered numerous visually unacceptable socket fusions, failures to label fusions as required by Columbia Gas Standards, records that failed to match the fuser identified on the pipe, and records that failed to match the fusion type used.

35. The results of the subsequent investigative digs of the Tropical Avenue Project prompted Respondent to investigate their completed Fallowfield, Spring Valley, Olivia, and Route 19 projects.

36. In or around August of 2021, Respondent began investigative digs at these additional project sites.

37. In total, the investigative digs at the Tropical Avenue, Fallowfield, Spring Valley, Olivia, and Route 19 projects resulted in the following findings:

- a) 176 fittings with fusions that were visually unacceptable according to Columbia Gas Standards, due to misalignment, over melt, missing impressions of cold ring clamps on the ends of the fusions, and voids, or a lack of melted plastic material at the ends of the fusion;
- b) 44 taps or “saddle tees” with fusions that were visually unacceptable according to Columbia Gas Standards, due to misalignment, over melt, missing impressions of cold ring clamps on the ends of the

fusions, and voids, or a lack of melted plastic material at the ends of the fusion;

- c) 222 records that did not match the fuser identified on the pipe or did not match the fusion type found upon excavation;
- d) 552 fusion that were not labeled according to Columbia Gas Standards, due to a lack of a label, label on one side of coupling only, or label on the coupling only; and
- e) 18 contractor employees who performed and inspected visually unacceptable fusions.

38. The fusions completed on the Tropical Avenue, Fallowfield, Spring Valley, Olivia, and Route 19 projects project were self-approved by the individual making the fusion and that individual was not always a qualified employee of Respondent.

39. On or about December 13, 2021, replacement of all visually unacceptable fusions was completed on the Tropical Avenue Project.

40. On or about August 17, 2021, replacement of all visually unacceptable fusions was completed on the Spring Valley Project.

41. On or about September 7, 2021, replacement of all visually unacceptable fusions was completed on the Fallowfield Project.

42. Replacement of all visually unacceptable fusions has been completed at the Olivia and Route 19 projects.

**III. RESPONDENT'S PROCEDURES**

**\*START CONFIDENTIAL\***

43. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

44. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

45. [REDACTED]

[REDACTED]

[REDACTED]

46. [REDACTED]

[REDACTED]

47. [REDACTED]

[REDACTED]

48. [Redacted]

[Redacted]

[Redacted]

[Redacted]

49. [Redacted]

[Redacted]

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50. [Redacted]

[Redacted]

51. [Redacted]

[Redacted]

[REDACTED]

[REDACTED]

[REDACTED]

52. [REDACTED]  
[REDACTED]  
[REDACTED]

**\*END CONFIDENTIAL\***

**IV. VIOLATIONS**

**COUNTS 1 THROUGH 220**

53. All allegations in paragraphs 1 through 52 are incorporated as if fully set forth herein. Respondent and Respondent’s contractors failed to identify no less than 220 visually unacceptable fusions and saddle tee fusions on service lines and main lines. If proven, this is a violation of 49 CFR § 192.13 (General Requirements) and 49 CFR §§ 192.273(b), (c) (Joining of Materials Other than by Welding - General).

**COUNTS 221 THROUGH 772**

54. All allegations in paragraphs 1 through 53 are incorporated as if fully set forth herein. Respondent failed to sign, mark, and label no less than 552 fusions

according to Columbia Gas Standards. If proven, this is a violation of 49 CFR § 192.13 (General Requirements) and 49 CFR § 192.273(b) (Joining of Materials Other than by Welding - General).

#### **COUNTS 773 AND 774**

55. All allegations in paragraphs 1 through 54 are incorporated as if fully set forth herein. Respondent and Respondent's contractor allowed an unqualified contractor employee, namely Employee B, to perform and inspect plastic fusions. If proven, this is a violation of 49 CFR § 192.285 (Plastic Pipe: Qualifying persons to Make Joints) and 49 CFR § 192.287 (Plastic Pipe: Inspection of Joints).

#### **COUNTS 775 THROUGH 818**

56. All allegations in paragraphs 1 through 55 are incorporated as if fully set forth herein. Respondent and Respondent's contractor failed to properly install no less than 44 saddle tee taps to a gas main line. If proven, this is a violation of 49 CFR § 192.303 (General Construction Requirements for Transmission Lines and Mains Compliance – Compliance with Specifications or Standards) and 49 CFR § 192.305 (General Construction Requirements for Transmission Lines and Mains Compliance – Inspection: General).

#### **COUNTS 819 AND 820**

57. All allegations in paragraphs 1 through 56 are incorporated as if fully set forth herein. Respondent and Respondent's contractor failed to capture and maintain accurate records of the pipeline components and personnel performing work on the

pipeline. If proven, this is a violation of 49 CFR §§ 192.1007(a)(1), (5) (Required Elements of an Integrity Management Plan).

### **COUNT 821**

58. As set forth in paragraphs 54 through 57, *supra*, Respondent failed to furnish and maintain adequate, efficient, safe and reasonable service and facilities and make such repairs, changes, alterations, substitutions, extensions and improvements in or to its service and facilities necessary or proper for the accommodation and safety of its patrons, employees and the public, thereby placing the safety of its customers, employees and the public in danger. If proven, this is a violation of 66 Pa.C.S. § 1501 (character of service and facilities).

### **V. REQUEST FOR RELIEF**

59. Due to the large number of violations based on Respondent's multiple failures to properly identify visually unacceptable socket fusions, multiple failures to mark or label the fusions in accordance with Columbia Gas Standards, allowing an unqualified employee to install and inspect socket fusions, multiple failures to properly install saddle tee taps to a gas main line, and failure to capture and maintain accurate records, I&E proposes that Respondent pay the maximum Federal civil penalty of Two Million, One Hundred Eighty-Six Thousand, Four Hundred Sixty-Five Dollars (\$2,186,465.00).

60. In addition to the civil penalty, I&E proposes the following corrective actions:

- a) Perform all contractor fusion Operator Qualification (OQ) testing in

house to Columbia's standards with 100% destructive testing of qualification fuses required in 49 CFR § 192.285.

- b) Require qualified Columbia personnel to visually accept and sign off on every fusion.
- c) Columbia may not recover the costs associated with these identified projects from ratepayers.
- d) Create a process to increase the likelihood of successful fusions in conjunction with Columbia's testing facility that includes monthly destructive testing of a sample fusion from each qualified fusers work, applicable to both Columbia and contractor fusers. Columbia should require each fusion qualified contractor or Columbia personnel to make a specimen joint for destructive testing to ensure the integrity of the joint using the actual material and fusion equipment to be utilized with similar environmental conditions to be found on site. This specimen joint should be completed with each size pipe to be used on the job with applicable fusion equipment to be used on the job. Columbia should determine the interval and frequency of this process.
- e) Provide high accuracy GPS records for each fusion made in Columbia's gas system and include photo documentation of each fusion. This requirement is to include photos encompassing the entire circumference (melt bead) of butt fusions as well as, as many

photos as required to document all required written fusion identification and times, as well as alignment. Management must review and approve these photos for fusion compliance, including visual fusion quality, in accordance with the requirements of 49 CFR §§ 192.1001-1015.

- f) Eliminate the use of socket fusion in Pennsylvania.
- g) Implement a Quality Assurance/Quality Control program following Safety Management Systems (SMS) for construction projects that includes having an employee and inspectors from outside the crew observe the crew to ensure that they are completing fusions and other construction tasks according to Columbia procedures. Columbia management must determine and implement measures designed to reduce the risks from failure of its gas distribution pipeline by creating a process to provide Quality Assurance and Quality Control of construction practices and construction oversight by a group separate and different from the construction inspectors.
- h) Develop more stringent span of control and job duties standards for inspectors. Columbia must implement measures to address risks by providing high level Quality Assurance/Quality Control Oversight specific to all Contractor and Columbia construction inspectors to ensure the integrity of its system is not compromised and providing inspectors more time to oversee construction and each fusion.

- i) In Pennsylvania, qualified Columbia personnel must inspect all forthcoming fusions completed by Infrasource employees, or any subsidiary or affiliation thereof, when those fusions are completed as part of a contractor relationship with Columbia.
- j) Create a process for trained and qualified Columbia management personnel to review completed fusions for compliance with Columbia Gas standards.
- k) Develop a procedure to visually inspect all plastic fusions, on existing facilities, that are exposed during the normal course of business. Include procedures to record the inspection findings and require any visually unacceptable fusions be removed from service and destructively tested.
- l) Map the location of all visually unacceptable fusions, even if the fusions have been removed from service.
- m) Develop a process to incorporate the findings of visually unacceptable fusions into the Columbia DIMP Program.
- n) Record and track fusions inspected by Columbia Inspectors and compare to fusions completed by construction project.
- o) Columbia must report all plastic fusion failures that were in service to I&E-Safety within 8 hours of discovery.

**WHEREFORE**, for all the foregoing reasons, the Bureau of Investigation and Enforcement of the Pennsylvania Public Utility Commission respectfully requests that the Commission: (1) find Respondent to be in violation of the Public Utility Code, Commission regulations, and/or Code of Federal Regulations for each of the eight hundred and twenty-one (821) counts set forth herein; (2) impose a maximum Federal civil penalty upon Respondent in the amount of Two Million, One Hundred Eighty-Six Thousand, Four Hundred Sixty-Five Dollars (\$2,186,465.00); (3) direct Respondent to perform each of the corrective actions detailed in this Complaint; and (4) order such other remedies as the Commission may deem appropriate.

Respectfully submitted,



Colby B. Widdowson  
Prosecutor  
PA Attorney ID No. 326185

Michael L. Swindler  
Deputy Chief Prosecutor  
PA Attorney ID No. 43319

Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

Date: November 21, 2023

**I&E**  
**EXHIBIT 1**



**I&E**  
**EXHIBIT 2**



**I&E**  
**EXHIBIT 3**



**I&E**  
**EXHIBIT 4**





**I&E**  
**EXHIBIT 5**



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**I&E**  
**EXHIBIT 6**



**I&E**  
**EXHIBIT 7**



**I&E**  
**EXHIBIT 8**



**I&E**  
**EXHIBIT 9**



**I&E**  
**EXHIBIT 10**



**NON-PROPRIETARY**

**I&E**  
**EXHIBIT 11**



**NON-PROPRIETARY**

**I&E**  
**EXHIBIT 12**



**NON-PROPRIETARY**

**I&E**  
**EXHIBIT 13**



**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement,	:	
Complainant	:	
	:	
v.	:	Docket No. C-2023-
	:	
Columbia Gas of Pennsylvania, Inc.,	:	
Respondent	:	

**VERIFICATION**

I, Matthew Matse, Fixed Utility Valuation Engineer, 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.



Matthew Matse  
Fixed Utility Valuation Engineer  
Pipeline Safety Division  
Bureau of Investigation and Enforcement

Date: November 21, 2023

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement,	:	
Complainant	:	
	:	
v.	:	Docket No. C-2023-
	:	
Columbia Gas of Pennsylvania, Inc.,	:	
Respondent	:	

**CERTIFICATE OF SERVICE**


I hereby certify that I have this day served a true copy of the foregoing **Formal Complaint (Non-Proprietary and Proprietary)** dated November 21, 2023 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).

**Service via Electronic Mail and Certified Mail, Return Receipt**

Theodore J. Gallagher, Esq.  
NiSource Corporate Services Co.  
121 Champion Way, Suite 100  
Canonsburg, PA 15313  
[tjgallagher@nisource.com](mailto:tjgallagher@nisource.com)

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Mark Kempic, President  
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\_\_\_\_\_  
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