



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

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

December 7, 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.
PPL Electric Utilities, Inc.
Docket No. C-2023-
I&E Formal Complaint (Damage Prevention)

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Formal Complaint of the Bureau of Investigation and Enforcement of the Pennsylvania Public Utility Commission in the above-referenced matter.

Copies are being served on the parties of record in accordance with the attached 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 'G. Rosul', is written over a light blue horizontal line.

Grant Rosul
Prosecutor
Bureau of Investigation and Enforcement
PA Attorney ID No. 318204
(717) 783-5243
grosul@pa.gov

GR/jfm
Enclosures

cc: Michael L. Swindler, Deputy Chief Prosecutor, I&E-Enforcement (*via email*)
As per Certificate of Service

NOTICE

A. You must file an Answer within twenty (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.

Additionally, please electronically serve a copy on:

Grant Rosul, Prosecutor
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
grosul@pa.gov

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

C. You may elect not to contest this Complaint by paying the administrative penalty within twenty (20) days and performing the corrective actions set forth in the requested relief. A certified check, cashier's check or money order should be payable to the "Commonwealth of Pennsylvania" and mailed to:

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

Your payment is an admission that you committed the alleged violations and an agreement to cease and desist from committing further violations. Upon receipt of your payment, the Complaint proceeding shall be closed.

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 the Commission to issue an Order imposing the administrative penalty and granting the requested relief as set forth in the Complaint.

E. If you file an Answer which contests the Complaint, the matter will proceed before the assigned presiding 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,	:	
Complainant	:	
	:	
v.	:	Docket No.: C-2023-
	:	
PPL Electric Utilities, Inc.,	:	
Respondent	:	

FORMAL COMPLAINT

NOW COMES the Bureau of Investigation and Enforcement (“I&E”) of the Pennsylvania Public Utility Commission, by its prosecuting attorneys, pursuant to Section 182 of the Underground Utility Line Protection Law (“UULPL” or “PA One Call Law”), Act of October 30, 2017, P.L. 806, No. 50, 73 P.S. § 182.8(c)(2), and files this Formal Complaint (“Complaint”) against PPL Electric Utilities, Inc. (“PPL” or “Respondent”) alleging violations of the PA One Call Law in connection with a strike on a PPL 120/240 volt secondary service line at the Lakewood Hills Apartment Complex, 880 Dartmouth Street, Lower Paxton Township, Dauphin County. In support of its Complaint, I&E respectfully avers as follows:

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, *inter alia*, facility owners, within the Commonwealth pursuant to the PA One Call Law, Act of October 30, 2017, P.L. 806, No. 50, 73 P.S. §§ 176 *et seq.*

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 (August 11, 2011) (delegating authority to initiate proceedings that are prosecutory in nature to I&E).

3. Complainant's prosecuting attorneys are as follows:

Grant Rosul
Prosecutor
grosul@pa.gov
(717) 783-5243

Michael L. Swindler
Deputy Chief Prosecutor
mwindler@pa.gov

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

4. Respondent is PPL Electric Utilities, Inc. with a main mailing address of Two North Ninth Street., Allentown, PA 18101.

5. PPL Electric Utilities Inc., is a "facility owner," as that term is defined in Section 176 of the PA One Call Law, 73 P.S. § 176.¹

¹ "Facility owner" is defined as "public utility or agency, political subdivision, municipality, authority, rural electric cooperative or other person or entity who or which owns or operates a line." 73 P.S. § 176. A "line" is synonymous with "facility" and is defined as "an underground conductor or underground pipe or structure used in providing electric or communication service, or an underground pipe used in carrying, gathering, transporting or providing natural or artificial gas, petroleum, propane, oil or petroleum and production product, sewage, water or other service to one or more transportation carriers, consumers or customers of such service and the appurtenances thereto..." Id.

6. Section 177 of the PA One Call Law, 73 P.S. § 177, imposes duties on facility owners.

7. Specifically, Section 177(5)(i) of the PA One Call Law, 73 P.S. § 177(5)(i), requires facility owners to “mark, stake, locate or otherwise provide the position of the facility owner's underground lines at the work site within eighteen inches horizontally from the outside wall of such line in a manner so as to enable the excavator, where appropriate, to employ prudent techniques, which may include hand-dug test holes, to determine the precise position of the underground facility owner's lines.” 73 P.S. § 177(5)(i).

8. Respondent, as a facility owner, is subject to the 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. 73 P.S. § 182.10.

9. Section 182.8(c)-(d) and Section 182.10 of the PA One Call Law, 73 P.S. §§ 182.8(c)-(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 to enforce the provisions of the PA One Call Law. 73 P.S. §§ 182.8(c)-(d) and 182.10.

10. Section 182.8(c)(2) of the PA One Call Law, 73 P.S. § 182.8(c)(2), authorizes the Commission’s prosecutorial staff to bring a formal complaint against entities subject to the PA One Call Law. 73 P.S. § 182.8(c)(2).

11. Section 182.10 of the PA One Call Law, 73 P.S. § 182.10(b)(1)(i)-(ii), authorizes the Commission to impose administrative penalties on any person or corporation, subject to the PA One Call Law, who violates any provisions of the PA One Call Law or any regulation or order issued thereunder governing underground utility lines, of up to \$2,500 per

violation or if the violation results in injury, death, or property damage of \$25,000 dollars or more an administrative penalty not to exceed \$50,000. 73 P.S. § 182.10(b)(1)(i)-(ii).

12. Section 176 of the PA One Call Law, 73 P.S. § 176, defines “injury” as “bodily harm to a person, who, as a result of the bodily harm, immediately receives medical attention away from the scene of the incident.” 73 P.S. § 176.

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

II. FACTUAL BACKGROUND

14. On June 22, 2022, workers from Pipeline Precision Solutions, a third-party contractor, were hand-digging with a shovel to install new gas meters on behalf of UGI in a grassy area outside of an apartment unit at the Lakewood Hills Apartment Complex at 880 Dartmouth Street, Lower Paxton Township, Dauphin County. I&E Exhibit 1.

15. The excavator, Precision Pipeline Solutions, was working under a valid routine PA One Call ticket.

16. The area was marked for communication cables.

17. However, in the same area, and unbeknownst to Precision Pipeline Solutions’ workers onsite that day, was an unmarked 120/240 volt secondary wire belonging to PPL.

18. PPL had responded to the PA One Call ticket submitted by Precision Pipeline Solutions as “field marked.”

19. While hand-digging with the shovel to expose the marked communication lines, the worker from Precision Pipeline Solutions made contact with the unmarked bare concentric service cable belonging to PPL. I&E Exhibit 2.

20. As a result of contacting the live electric wire belonging to PPL, there was an arc flash and the metal shovel head was deformed. I&E Exhibit 3.

21. Emergency services were called, and the worker was taken to the hospital where he was admitted and kept overnight for observation.

22. On June 23, 2023, PPL filed its Alleged Violation Report (“AVR”) with the Commission.

III. VIOLATIONS

23. Paragraphs 1-22 are incorporated herein as if stated in their entirety.

24. Respondent failed to correctly mark or locate its facilities.

If proven, this is a violation of Section 177(5)(i) of the PA One Call Law, 73 P.S. § 177(5)(i). As a facility owner, Respondent was required to stake, mark, locate, or otherwise provide the position of their underground lines at the work site so as to enable the excavator to employ prudent techniques to determine the precise location of the underground facilities and thus avoid damage to the facility or injury to persons. PPL has admitted in its AVR that its facilities were mismarked. As a result, a worker from Precision Pipeline Solutions was injured and hospitalized.

The Bureau of Investigation and Enforcement’s proposed administrative penalty for this violation is \$25,000.

WHEREFORE, for all the foregoing reasons, the Pennsylvania Public Utility Commission’s Bureau of Investigation and Enforcement respectfully requests that the Commission:

- (1) Find PPL Electric Utilities, Inc. to be in violation of the PA One Call Law at 73 P.S. § 177(5)(i);

- (2) Impose an administrative penalty upon PPL Electric Utilities, Inc. in the amount of \$25,000; and
- (3) Order PPL Electric Utilities, Inc. to attend an educational program for facility owners through the Damage Prevention Committee and provide proof of compliance to the Commission; and
- (4) Order such other remedies as the Commission may deem appropriate.

Respectfully submitted,



Grant Rosul
Prosecutor
PA Attorney ID No. 318204

Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
(717) 783-5243
grosul@pa.gov

Date: December 7, 2023

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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 that the Bureau of Investigation and Enforcement 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: December 7, 2023



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

I&E
EXHIBIT 1

Alleged Violation Report

PA Act 287, as amended 73 P. S. § 176 et. seq.
Powered by Pennsylvania One Call System, Inc.

AVR Number AVR2022JUN230029

AVR Version 1

First Name STEPHEN **Last Name** KRAUSE

Company Name PPL ELECTRIC UTILITIES CORPORATION

Address 1801 BROOKWOOD ST

City HARRISBURG

State PA

Zip Code 17104

Email STKRAUSE@PPLWEB.COM **Phone** 7179263357

Ext

Role

Submitter Role(s) (?)

- | | |
|--|---|
| <input checked="" type="checkbox"/> Facility Owner | <input type="checkbox"/> Designer |
| <input type="checkbox"/> Excavator | <input type="checkbox"/> Project Owner |
| <input type="checkbox"/> Locator | <input type="checkbox"/> Enforcement Agency |
| <input type="checkbox"/> Other | |

Are you representing a company other than your own? Yes No

What company or individual are you representing?

Alleged Violation Information

PUC Case Number (if known)

Related AVR Number (?)

Type of Alleged Violation (?) Facility Owner Issue

Reason Marked incorrectly §2(5)

When did the alleged violation occur? (?) 06/22/2022

10:00:00 AM

Was the One Call System notified? Yes No

Original Serial Number

Please enter the 11 digit One Call Serial Number under which work was taking place, which will populate the work site information of this alleged violation.

20221524028

Related Damage Serial Number, if applicable

20221731407

Other Related Serial Numbers (?)

20221651469

Other Related Serial Numbers (?)

20221683519

Other Related Serial Numbers (?)

20221574919

Was the excavation exempt from One Call notification? Yes No Unknown

Reason for Exemption

Event Information



County DAUPHIN

Municipality LOWER PAXTON TWP

Ward 0

Work Site 880 DARTMOUTH ST

Nearest Intersection LONDONDERRY RD

Second Intersection SEQUOIA DR

Geolocation (?)

Affected Facility Information



Primary Right of Way Type Private

Public Right of Way Type

Private Right of Way Type Land Owner

Affected Operation Electric

Facility Subtype Affected Service/Drop/Lateral

Facility Owner Company Name PPL Electric Utilities

Contact First Name Stephen

Last Name Krause

Address 1801 Brookwood Street

City Harrisburg

State PA

Zip 17104

Email stkrause@pplweb.com **Phone** 717-926-3357

Joint Trench? Yes No Unknown

Involve Cross Bore? Yes No Unknown

Measured Depth from Grade 18" - 36" / 46 - 91 cm

Exact Measured Depth from Grade Enter the inches or centimeters with number and measurement used

Work Information



Start Date of Excavation (?)

Excavation Activity NATURAL GAS

Excavator Company Name Precision Pipeline Solutions

Contact First Name Joseph **Last Name** Beyer

Address 1653 Lititz Pike

City Lancaster

State PA

Zip 17601

Email mcruley@precisionpipelin
esolutions.com **Phone** 717-472-3976

Marked in White Yes No Unknown

Method of Excavation

Equipment Used What Equipment was used for excavation or demolition when the event occurred?

Type of Excavator What is the type of excavator for whom the work was being done when the event occurred?

Did Excavator incur down time? Yes No Unknown

How much down time?

Estimated cost of down time

Was a response posted to the One Call System? Yes No Unknown

Was the design serial number on the plans/bid documents? Yes No Unknown

Were the lines shown on the plans/bid documents? Yes No Unknown

What level of subsurface utility engineering was utilized?

Estimated cost of the entire project

What was the length of the entire project?

Project Owner Company Name UGI

Contact First Name Last Name

Address

City

State

Zip

Email Phone

Event Impact



Did Violation result in underground damage or near miss event? Damage

OSHA Report Filed? Yes No

OSHA Report Number

Was 911 called? Yes No

Name of 911 Caller

Fire Response Yes No

Police Response Yes No

Did the incident cause any injuries? Yes

Number of Injuries (?) 1

Did the incident cause any deaths? Yes

Number of Deaths

Was there an evacuation? Yes No

Number of people evacuated?

Traffic Stopped? Yes No

Service Interrupted? Yes No

Duration of Service Interruption?

Exact Value of Service Interruption

Approximately how many customers were affected?

Exact Number of Customers Affected

Cost of Damaged Line Repair? Unknown

Exact Cost of Damaged Line Repair

Was other property damaged? Yes No

What other property was damaged?

Cost of Other Property Repair

Locator/Locate Information



Who was the facility line locator? Contract Locator

Locator Company USIC

Contact First Name Daylin Last Name Knaub

Address 450 South Henderson Road Suite B

City King of Prussia

State PA

Zip 19406

Email daylinknaub@usicllc.com Phone 717-433-5687

Was the line marked? Accurately Inaccurately/Incompletely Not Marked
 Unknown

Were facilities marked according to APWA/CGA temporary marking color code (ANSI standard Z535.1)? Yes No Unknown

What types of marks were present? Paint
 Flags
 Stakes
 Other

Were offset markings used? Yes No Unknown

Condition of Marks Visible

Was the line marked by the response due date or within the agreed upon locate schedule? (?) Yes No Unknown

Reason for Late Locate

Was the excavation within the tolerance zone? (?) Yes No Unknown

Was there an indication of underground facilities (clear evidence) in the excavation area? Yes No Unknown

What was the evidence? Pad-mount transformer and electric meters
(meter/pedestal, pipeline marker, valve box, hydrant, manhole, etc.)

What method(s) were used to locate the facility? Electronic Records
 Visual Exposed

Did the excavator request payment under PennDOT Form 408 specifications for extra work performed on a force account basis? Yes No

Additional Locate Comments Locators credentials available upon request.

If this incident involved any locating/marketing errors, please include all records related to the locator's training and qualification (including training to meet UULPL standards as well as Operator Qualification).

Summary and Attachments

Provide a summary of the event

On Wednesday, 6/22/2022 at approximately 1000 a non-PPL contractor from Precision Pipeline Solutions contacted an underground 120/240 volt secondary / service cable with a shovel while hand digging to expose marked communications lines at Lakewood Hills Apartments, 880 Dartmouth Street, Harrisburg, Lower Paxton Township, Dauphin County.

There was one reported possible electrical contact. No customers lost power. The excavator was working with a valid PA One Call ticket to replace gas metering equipment for UGI.

PPL Public Safety investigation determined that the electrical service line was miss-marked. The worker had been hand digging to expose marked communications lines when his shovel contacted the energized bare concentric service cable, causing an arc/flash. There was notable damage to the shovel. The worker was taken to an area medical facility for evaluation. PPL crews de-energized the service until repairs could be made.

If more space is needed, attach additional pages or documents.

Attachments

880 Dartmouth St1.JPG	292.46KB
880 Dartmouth St2.JPG	216.01KB
20221524028 Locate Photos (1).jpg	98.12KB
20221524028 Locate Photos (2).jpg	90KB
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20221731407 Damage Ticket Photos (9).jpg	161.76KB
20221731407 Damage Ticket Photos (10).jpg	159.45KB
20221731407 Damage Ticket Photos	159.34KB

(11).jpg 154.94KB
20221731407 Damage Ticket Photos
(12).jpg
Attach pictures and additional documents

Submit Date 06/23/2022

Compliance Update

Research Result

- Listed tickets found
- Additional tickets found
- No tickets found

Additional Tickets Found

Additional Serial Numbers 20211104098

Additional Serial Numbers 20212391835

Additional Serial Numbers 20220884021

Additional Serial Numbers

Ticket Attachment 18615431494109 cpa documents.pdf 1.04MB

Comments

I&E
EXHIBIT 2



I&E
EXHIBIT 3



**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

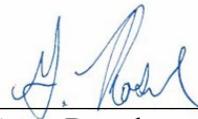
Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement,	:	
Complainant	:	
	:	
v.	:	Docket No.: C-2023-
	:	
PPL Electric Utilities, Inc.,	:	
Respondent	:	

CERTIFICATE OF SERVICE

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

Service by Certified First-Class and Electronic Mail

PPL Electric Utilities
Attn: Kimberly A. Klock
Two North Ninth Street
Allentown, PA 18101
kklock@pplweb.com



Grant Rosul
Prosecutor
PA Attorney ID No. 318204

Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
(717) 783-5243
grosul@pa.gov

Dated: December 7, 2023