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September 5, 2024

VIA E-FILING

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

Re: Application of UGI Utilities, Inc. for the Approval of the Alteration of DOT Grade Rail Crossing No. 518165H by the Installation of an eight-inch (8") PE Gas Line in existing twelve-inch (12") Steel Casing under The Tracks of the National Railroad Passenger Corporation (Amtrak), Where the Tracks Cross Greenfield Road, T-549, Above Grade in East Lampeter Township, Lancaster County, Pennsylvania, **Docket No. A-2024-3050598**

Dear Secretary Chiavetta:

Enclosed, please find responses to comments for the above-captioned application of UGI Utilities, Inc. – Gas Division (“UGI” or “Applicant”). Should you have any questions concerning this filing, please feel free to contact me.

Very truly yours,

DocuSigned by:

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Tamara Kelly
Counsel for UGI Utilities, Inc. – Gas
Division

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of UGI Utilities, Inc. for the :
Approval of the Alteration of DOT Grade :
Rail Crossing No. 518165H by the :
Installation of an eight-inch (8”) PE Gas Line :
in existing twelve-inch (12”) Steel Casing :
under The Tracks of the National Railroad : Docket No. A-2024-3050598
Passenger Corporation (Amtrak), Where the :
Tracks Cross Greenfield Road, T-549, Above :
Grade in East Lampeter Township, Lancaster :
County, Pennsylvania :

To the Pennsylvania Public Utility Commission:

1. The name and address of Applicant are:

UGI Utilities, Inc. – Gas Division
1 UGI Drive
Denver, PA 17517

2. The name and address of Applicant’s attorney is:

Tamara Kelly
(Attorney I.D. 316360)
500 North Gulph Road
King of Prussia, PA 19406
kellyt@ugicorp.com
Office: (610) 768-3628

3. On August 7, 2024, UGI filed an application in the above-captioned matter with the Pennsylvania Public Utility Commission (“PUC”) seeking approval for the proposed crossing of Amtrak facilities. On August 13 2024, the PUC issued a notice for objections to the application, due by September 4, 2024. On August 20, 2024, Amtrak filed a comment chart on the application docket and sent a copy of the same to UGI.
4. UGI’s responses to Amtrak’s comments are shown in the attached Exhibit A. While UGI identified additional items on the drawings included with its PUC application to accommodate Amtrak’s requests, no changes were made to the underlying plans.

Respectfully submitted,

DocuSigned by:

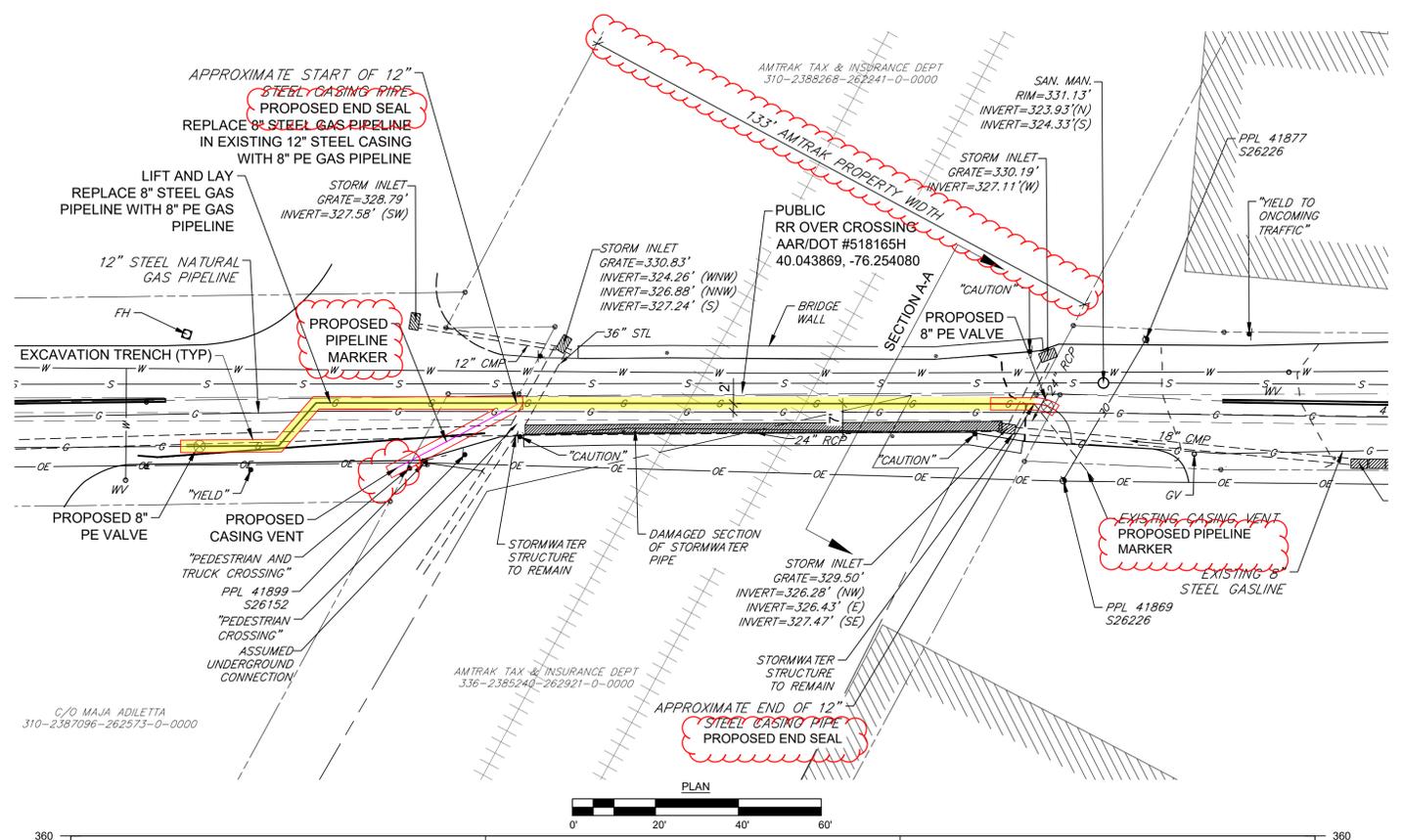
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Tamara Kelly
Counsel for UGI Utilities, Inc. – Gas
Division

Dated: September 5, 2024

EXHIBIT A

			Revision 0		Revision 1			
Item Number	Discipline	Item Reviewed	Date: 8/19/2024 Amtrak Comment	Reviewer Initials	Designer Response	Designer Response Date	Date: Amtrak Comment	Reviewer Initials
1	Real Estate	Plans	Provide a copy of the agreement for the existing utility occupancy.	BIA	Attached is the proposed drawing for the crossing, we do not have a copy of the written text.			
2	Real Estate	Plans	Confirm the PA PUC Docket Number assigned to the project	BIA	A-2024-3050598			
3	Real Estate	Plans	Confirm if the work has been completed. Provide the completion date.	BIA	Original crossing was retired for emergency on 4/12/2024. This was covered under Nunc Pro Tunc application. This project covers replacement of the crossing within existing casing pipe.			
4	Real Estate	Plans	Clearly label and dimension (width) the Amtrak property limits on the plan view.	BIA	Label and dimension (width) of the Amtrak property limits added to the Plan View and circled in red.	8/27/2024		
5	Real Estate	Plans	Provide casing pipe end seal details and show the location of the end seals.	BIA	Casing and end seal detail added under Detail 1.1. Callouts added and circled in red on the Plan View to show the location of the end seals.	8/27/2024		
6	Real Estate	Plans	Provide utility marker signs over the pipeline adjacent to the roadway, if possible.	BIA	Callouts added and circled in red on the Plan View to show the location of the utility marker signs.	8/27/2024		
7	Real Estate	Plans	Revise the casing pipe vent label leader arrow to a point on the plan view. The arrow is directed toward empty space.	BIA	Leader arrow now points to the casing pipe vent label.	8/27/2024		
8	Real Estate	Plans	Highlight the proposed natural gas pipeline on plan view.	BIA	Proposed natural gas pipeline is now highlighted on the Plan View.	8/27/2024		
9	Real Estate	Plans	Provide a completed proposed pipe data sheet.	BIA	Pipe data sheet provided.	8/27/2024		
10	Real Estate	Plans	<p>The following notes must be added to the plan set:</p> <ol style="list-style-type: none"> All work on or adjacent railroad property must comply with Amtrak Engineering Practices EP3014 – Maintenance and Protection of Railroad Traffic During Contractor Operations. Design and construction must comply with Amtrak Engineering Practices EP3005 – Pipeline Occupancy. Prior to construction operations, contractor must submit, at a minimum, the following to Amtrak for review and approval: construction procedure means and methods, schedule, dewatering system (if any), and calculations, as applicable. All calculations must be signed and stamped/sealed by a licensed engineering registered in the State. All underground utilities, cable, and facilities must be located and protected before any excavating, drilling, boring/directional drilling, ground penetrating activities, or construction takes place. This includes railroad and commercial utilities, cables, duct lines, and facilities. These activities will not be performed in close proximity to the railroad duct lines unless monitored by on-site Amtrak Communications and Signal (C&S) department personnel. Hand digging may be required, as directed by Amtrak through the on-site Amtrak C&S support personnel. Amtrak maintains the right to access all existing cables and conduits throughout construction. Amtrak also reserves the right to upgrade and install new cables and conduits in the affected area. The "one-call" process must be followed. Be aware that Amtrak is not part of the one-call process; contact Amtrak Engineering to have all railroad underground utilities and assets located. If requested by Amtrak, existing depths of utilities being crossed must be verified through test pits performed by the Contractor as directed by and under the direct supervision of Amtrak C&S support personnel. Precautions must be taken to prevent any interruption to railroad operation. Any work (or equipment being staged onsite during construction) performed at or near a railroad crossing must not obstruct the view of flashing light units or gates to oncoming traffic. Prior to entering Amtrak's property for any work, the contractor must execute Amtrak's standard Temporary Permit to Enter Upon Property (PTE). The fully executed PTE, written notice to proceed from Amtrak that all requirements of the PTE have been met and proof of safety training must, at all times, be furnished by the contractor at the project site. All persons that are on or adjacent to the railroad property must successfully complete the Contractor Orientation Training. All Contractors must carry their "Amtrak Contractor Roadway Worker Protection" card with them at all times while on or adjacent to railroad property. Any debris or damage resulting from work shall be immediately reported to the railroad. Railroad shall be repaired by railroad forces at project expense. Excavated materials originating from Amtrak ROW are not permitted to leave Amtrak ROW. All excavated material shall be returned to its place of origin or spread evenly across the Amtrak ROW at a location(s) approved by Amtrak. 	BIA	All notes added on the plan set.	8/27/2024		

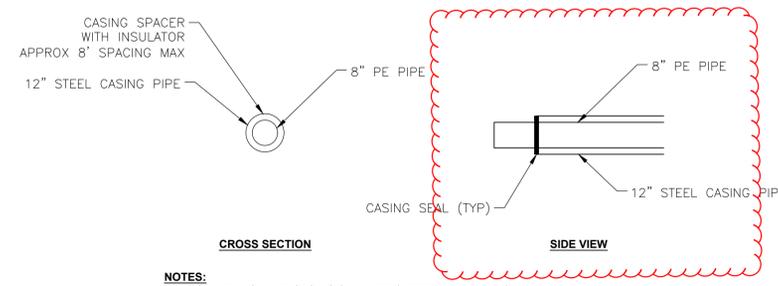


LEGEND AND SYMBOLS

EXISTING	ITEM
---	PROPERTY LINE
---	ROADWAY
---	APPROXIMATE RIGHT OF WAY
---	EDGE OF ROAD
---	MAJOR CONTOUR
---	MINOR CONTOUR
---	STORM PIPE
---	STREAM
---	WETLAND
---	SOILS LINE/LABEL
---	WATER WELL
---	FLOODWAY
---	FLOOD PLAIN
---	STORM INLET
---	GAS LINE WITH VALVE
---	ELECTRICAL OVERHEAD
---	ELECTRIC UNDERGROUND
---	WATER LINE WITH VALVE
---	SANITARY LINE
---	UTILITY MANHOLE
---	EXCAVATION AREA
---	VENT LINE

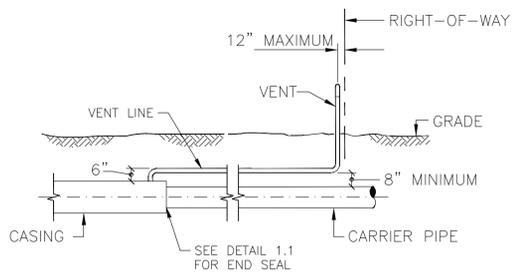
- GENERAL NOTES:**
1. THE PERMITTEE MUST CONTACT THE PENNSYLVANIA ONE-CALL NUMBER AT 1-800-242-1776 THREE WORKING DAYS PRIOR TO THE START OF WORK TO HAVE ALL UTILITIES MARKED IN THE AREA.
 2. CONTRACTOR SHALL FOLLOW ALL REQUIREMENTS OF NORFOLK SOUTHERN'S NSCE-8 SPECIFICATIONS LATEST EDITION.
 3. PIPELINE AND CROSSING TO BE INSTALLED AND MAINTAINED IN ACCORDANCE WITH LAST APPROVED AMERICAN RAILWAY ENGINEERING AND MAINTENANCE OF WAY ASSOCIATION SPECIFICATIONS FOR PIPELINES CONVEYING FLAMMABLE AND NON-FLAMMABLE SUBSTANCE.
 4. BLASTING NOT PERMITTED.
 5. CATHODIC PROTECTION SHALL BE PROVIDED PER INDUSTRY STANDARDS.

- RAILROAD CROSSING NOTES:**
1. All work on or adjacent railroad property must comply with Amtrak Engineering Practices EP3014 - Maintenance and Protection of Railroad Traffic During Contractor Operations.
 2. Design and construction must comply with Amtrak Engineering Practices EP3005 - Pipeline Occupancy. Prior to construction operations, contractor must submit, at a minimum, the following to Amtrak for review and approval: construction procedure means and methods, schedule, dewatering system (if any), and calculations, as applicable. All calculations must be signed and stamped/sealed by a licensed engineering registered in the State.
 3. All underground utilities, cable, and facilities must be located and protected before any excavating, drilling, boring/directional drilling, ground penetrating activities, or construction takes place. This includes railroad and commercial utilities, cables, duct lines, and facilities. These activities will not be performed in close proximity to the railroad duct lines unless monitored by on-site Amtrak Communications and Signal (C&S) department personnel. Hand digging may be required, as directed by Amtrak through the on-site Amtrak C&S support personnel. Amtrak maintains the right to access all existing cables and conduits throughout construction. Amtrak also reserves the right to upgrade and install new cables and conduits in the affected area. The "one-call" process must be followed. Be aware that Amtrak is not part of the one-call process; contact Amtrak Engineering to have all railroad underground utilities and assets located. If requested by Amtrak, existing depths of utilities being crossed must be verified through test pits performed by the Contractor as directed by and under the direct supervision of Amtrak C&S support personnel. Precautions must be taken to prevent any interruption to railroad operation.
 4. Any work (or equipment being staged onsite during construction) performed at or near a railroad crossing must not obstruct the view of flashing light units or gates to oncoming traffic.
 5. Prior to entering Amtrak's property for any work, the contractor must execute Amtrak's standard Temporary Permit to Enter Upon Property (PTE). The fully executed PTE, written notice to proceed from Amtrak that all requirements of the PTE have been met and proof of safety training must, at all times, be furnished by the contractor at the project site.
 6. All persons that are on or adjacent to the railroad property must successfully complete the Contractor Orientation Training. All Contractors must carry their "Amtrak Contractor Roadway Worker Protection" card with them at all times while on or adjacent to railroad property.
 7. Any debris or damage resulting from work shall be immediately reported to the railroad. Railroad shall be repaired by railroad forces at project expense.
 8. Excavated materials originating from Amtrak ROW are not permitted to leave Amtrak ROW. All excavated material shall be returned to its place of origin or spread evenly across the Amtrak ROW at a location(s) approved by Amtrak.

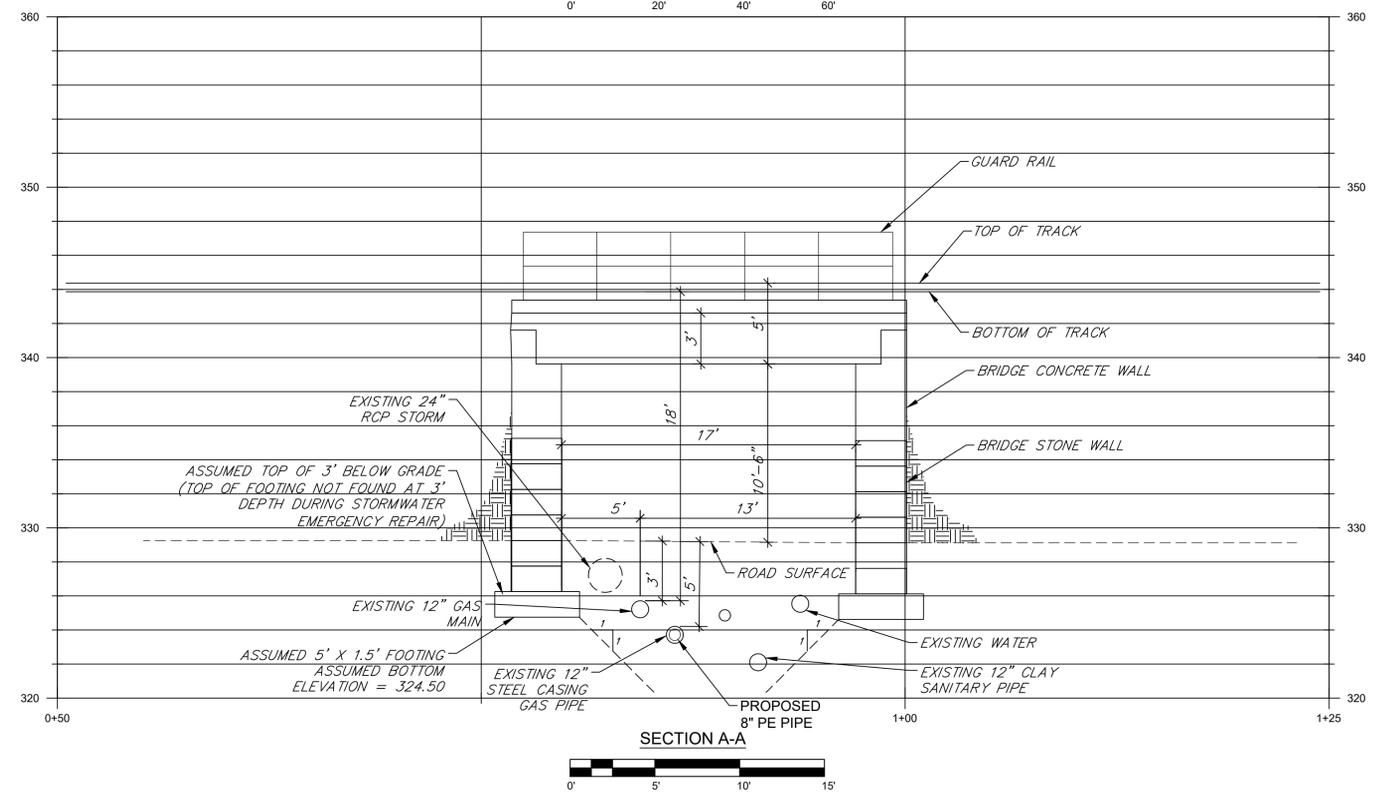
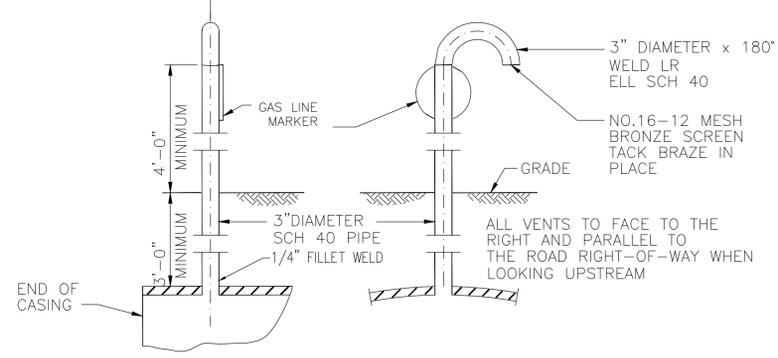


- CROSS SECTION NOTES:**
1. BOTH END OF THE CASING SHALL BE CAPPED WITH LINK-SEAL FOLLOWED BY TRENTON SEAL-WRAP END SEAL (OR APPROVED EQUAL).
 2. THE CASING PIPE SHALL BE VENTED AT THE HIGH SIDE END. THAT CASING VENT DISCHARGE LINE SHALL BE ROUTED.
 3. BOTH ENDS OF THE CASING SHALL USE A CCI PIPING SYSTEMS POLYETHYLENE CASING SPACERS (OR APPROVED EQUAL) TO CENTER THE CARRIER PIPE INSIDE THE CASING PIPE

DETAIL 1.1



DETAIL 1.2



<p>UGI Utilities, Inc. 262 Conestoga Street Lancaster, PA 17603</p>	<p>FINAL DESIGN TICKETS 20241561773 20241561774</p>	<p>BASE PREPARED BY:</p> <p>a verdantas company</p>	<p>UGI CONTACT INFORMATION:</p> <p>PROJECT OWNER: CHRIS JAPCHEN 484-256-9877</p> <p>PROJECT MANAGER: N/A</p>	<p>08/26/2024</p>	<p>GREENFIELD RD BRIDGE GAS MAIN EAST LAMPETER TOWNSHIP LANCASTER COUNTY, PA</p>	<p>FP NO.: B018833 / SO NO.: 9000017827</p> <table border="1"> <thead> <tr> <th>SIZE</th> <th>MATERIAL</th> <th>METHOD</th> <th>WORK REQUEST NO.</th> <th>SAP ERP NO.</th> </tr> </thead> <tbody> <tr> <td>8"</td> <td>PE</td> <td>INSERT</td> <td>726477</td> <td>1003067653</td> </tr> <tr> <td>8"</td> <td>PE</td> <td>DB</td> <td>727895</td> <td>1003090911</td> </tr> </tbody> </table>	SIZE	MATERIAL	METHOD	WORK REQUEST NO.	SAP ERP NO.	8"	PE	INSERT	726477	1003067653	8"	PE	DB	727895	1003090911	<p>RR-1</p> <p>RAILROAD 1</p> <p>Sheet 5 of 7</p>
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<p>Aug 26, 2024 - 3:56pm</p>																						

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Tracks Cross Greenfield Road, T-549, Above :
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County, Pennsylvania :

VERIFICATION

I, Geoffrey Ferguson, Sr. Manager - Area Engineering for UGI Utilities, Inc. 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:

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Geoffrey Ferguson
Date: September 5, 2024