
Robert Kuniege1,		
v.		Docket No.:
Pennsylvania-American		C-2024-3052368
Water Company		
Initial Call-In		
Telephonic Hearing		

Pages 1 - 49

Judge's Chambers
Commonwealth Keystone
Building - Plaza Level
400 North Street
Harrisburg, PA

Wednesday, March 5, 2025
Commencing at 10:07 a.m.

INDEX TO EXHIBITS

Docket No. C-2024-3052368

Hearing Date: March 5, 2025

<u>NUMBER</u>	<u>FOR IDENTIFICATION</u>	<u>IN EVIDENCE</u>
Kuniege1's Exhibit 1	14	17
Letter		

Kuniegel's Exhibit 2	14	17
Invoice from All-Terrain		
Kuniegel's Exhibit 3	14	17
Photo 12/31/24		
Kuniegel's Exhibit 4	15	17
Invoice from All-Terrain		
PAWC's Exhibit 1	22	41
107 Drakes Lane Sketch		
PAWC's Exhibit 2	26	41
1988 Service Record		
PAWC's Exhibit 3	24	41
Tariff Excerpt		



EXHIBIT
Kuniegel 1
DP 3/5/25

RCVD PUC SEC BUR
FEB 3 2025 AM 10:34

In August 2024, I received a call of service from Robert Kuniegel for a residence he owns at 107 Drakes Lane in Old Forge Pennsylvania for the report of a leaking water line. Kuniegel told me that he had PA American Water come to the aforementioned location and they told him that the water leak was located between his curb box and the residence.

On August 5, 2024, I began exploratory excavation of the water line at 107 Drakes Lane. I dug approximately 4' down and found the waterline approximately 4' from the curb box that was located in the sidewalk. I could not find a leak there, so I dug next to the curb box. After excavating near the curb box, I located the valve and determined there was no leak from the valve. I excavated down the line toward the residence and located another abandoned curb box approximately 6' from the current curb box in the sidewalk that was buried approximately 2' below the surface. As I continued to excavate, I discovered that the valve attached to the second curb box I found had deteriorated and was leaking. After finding the second curb box and valve, I contacted Kuniegel and let him know my findings. Kuniegel called PA American Water and they told him they would send out a crew the next day.

On August 6, 2024, PA American water sent out a crew that said they would replace the curb box in the sidewalk and move it off the sidewalk into the grass area of the residence. The crew performed the work and placed coal patch over the sidewalk area and said they would pave the area later in the year.

For my exploratory excavation I was compensated \$1,175.00 that I charged to Kuniegel.

Nathan Kilian
Owner
All-Terrain Excavation, LLC

C-2024-
EXHIBIT A-13052368
contractor explanation of events.

INVOICE

All-Terrain Excavation
4703 Birney Ave
Moosic, PA 18507

a.terrainexcavation@gmail.com
+1 (57C) 862-2115
www.a.l-terrainexcavation.com



Bill to

Robert Kuniege1
1079 State Route 502
Spring Brook Township, PA
18444

ROAD PUC SEC BUR
FEB 3 2025 11:10:34

Invoice details

Invoice no.: 1128
Terms: Net 30
Invoice date: 08/16/2024
Due date: 09/15/2024

#	Date	Product or service	Description	Qty	Rate	Amount
1		Services	- Cutting/ prep of blacktop sidewalk near roadway - Exploratory excavation of curb box for water leak - Found secondary broken curb valve closer to residence - Exposure of broken curb valve - Called PA American Water and had them respond to assess situation - Provided protection mats for PA American Water to replace curb box in sidewalk			\$1,000.00
2		Services	Materials: - 2A modified - Topsoil - Seed - Straw			\$175.00

Total

\$1,175.00

Ways to pay

DATE # PAYOR

Note to customer
Thank you for your business

C-2024-3052368

A-2
Invoice paid by me to contractor
disputed asking to be reimbursed.

EXHIBIT

Kuniegel 3

DP 3/5/25



INVOICE

All-Terrain Excavation
4703 Birney Ave
Moosic, PA 18507

a.terrainexcavation@gmail.com
+1 (570) 862-2115
www.all-terrainexcavation.com



RCVD PUC SEC BUR
FEB 3 2025 AM 10:35

Bill to

Robert Kuniege1
1079 State Route 502
Spring Brook Township, PA
18444

Invoice details

Invoice no.: 1129
Terms: Net 30
Invoice date: 08/16/2024
Due date: 09/15/2024

#	Date	Product or service	Description	Qty	Rate	Amount
1.		Services	<ul style="list-style-type: none"> - Cutting / removal of pavement in walkway going up to residence - Excavation of trench from house to new curb box - Placement of 3/4" water line through wall of residence - Placement of concrete to cover hole created on foundation for water line - Spray foam placed on interior wall of residence to fill void created by water line pass through - Attached water line to curb box - Attached water line to meter pipe inside residence - Performed leak test - Backfilled water line trench and compacted in 1' lifts - Placement of 2A modified around exposed foundation and width of trench underneath sidewalk to prevent settling 			\$1,000.00
2.		Services	<p>Materials:</p> <ul style="list-style-type: none"> - 2A modified - 3/4" waterline - Various fittings to route waterline inside of residence - Topsoil - Seed - Straw 		\$507.00	\$507.00

*# C-204-3052368
A-4
invoiced paid not
disputed, I replaced
water line after valve.*

SERVICE SIZE 3/4 - 1 - 2

FORM 14
(REV. 10 - 98)

TAP ORDER

SERVICE NUMBER _____ ORDER NO. 412473

DATE 8/6/24 W.O. OR ACCT NUMBER 234-9141.20-0

NEW SERVICE KILL SERVICE REPLACE SERVICE

NEW SERVICE: 3/4 IN. TAP: 3/4 IN. Copper PIPE

OLD SERVICE: 3/4 IN. TAP: 3/4 IN. Black PIPE

COMPANY OWNED ABANDONED
COMPANY OWNED REMOVED

OWNER _____

LOCATION 107 Drakes LN

LOT _____ BLOCK _____ MUNICIPALITY Old Forge

DEVELOPMENT _____

RESIDENCE OTHER (SPECIFY) _____

QUAN.	SIZE	MATERIAL INSTALLED	SAP#
	3/4"	CORP.	1411798
	1"	CORP. COCK	1411797
<u>10'</u>	<u>3/4</u>	COPPER PIPE	
<u>1</u>	3/4"	CURB STOP	1411872
	3/4"	CURB STOP CXIPF	1413049
	1"	CURB STOP	1411869
	1"	CURB STOP CXIPF	1413050
<u>2</u>	3/4"	COMP NUT W / WASHER	1411937
	1"	COMP NUT W / WASHER	1411933
	2"	CURB STOP	1411846
	2"	COUP CXF	1412066
	2"	COUP CXM	1412045
		SERVICE SADDLE	
<u>1</u>	5"	CURB BOX	1412991
	5"	CURB BOX 2"	1412990

WORK COMPLETED 8/6/24 BY Company Crews

POSTED TO SERVICE RECORD BY _____

METER SHEET PREPARED BY _____

ENTERED ON STOCK REPORT FOR _____ MONTH

LOCATION DATA

TOP OF 10" IN. CZ MAIN IS 4 FT. 0 IN.

BELOW SURFACE, AND Directly FT. _____ IN. _____ OF

CURB Under the curb on Drake LN

PROP. LINE ON _____ ST.

TAP IS 80 FT. 3 IN. FROM INTERSECTING CURB

MEDIAN LINE ON Main St

DISTANCE, TAP TO METER PIT

CURB STOP 10 FT. 0 IN.

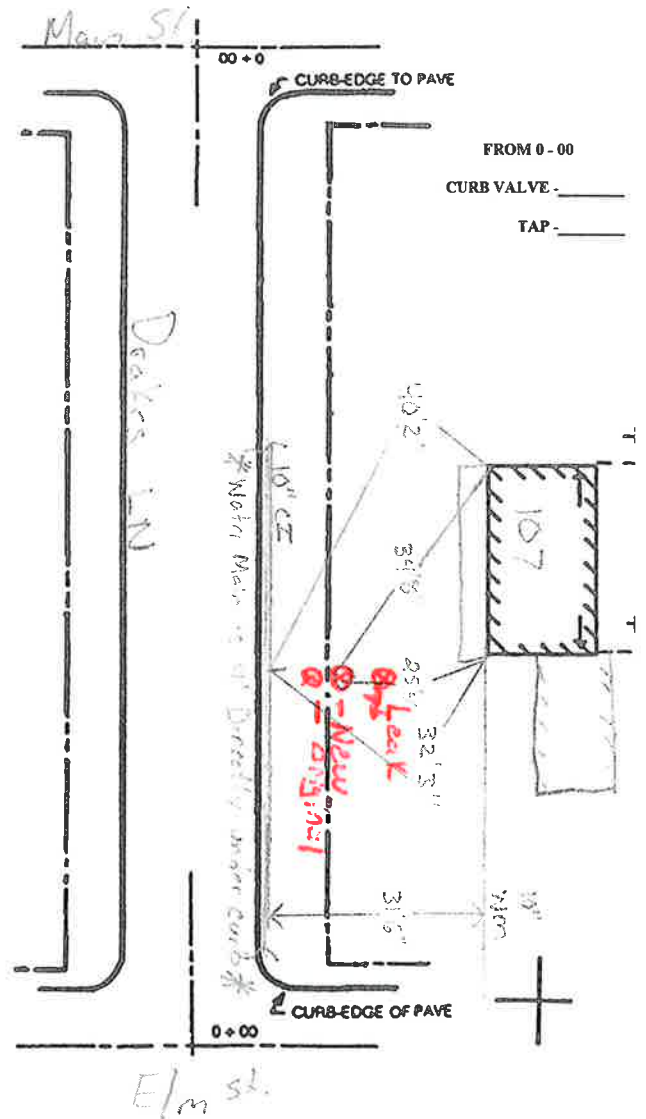
DISTANCE, CURB TO CURB STOP 10 FT. 0 IN.

LOCATION OF METER PIT

CURB BOX IN Grass patch off of Blacktop side walk

DATA FURNISHED BY 6362

DIAGRAM



COMPLETED DIAGRAM WITH CORRECT DISTANCES

COMPLETED

MUNICIPALITY: OLD FORGE STREET DRAKES LANE HO. NO. 107

NAME: Ruth ACCOUNT

NEW RENEWAL RE-CONN. TO NEW MAIN RELOCATED RETIRE

METER INSIDE KIND OF PIPE MAIN TO HOUSE MAIN TO CURB CURB TO HOUSE HOUSE TO HOUSE
 METER OUTSIDE PIPE LENGTH SIZE LENGTH SIZE LENGTH SIZE LENGTH SIZE

INSERTION DIRECT BURIAL PWT 3.2 3/4

OLD PIPE CASING NEW CASING EXIST. UNCHANGED

RETIRED 1959 CT 5 3/4

SERVICE VALVE LOCATION MAIN TRELAWN SIDEWALK PROP. LINE CUST. PROP. METER SET NONE

INSTALLED BY: RUTH CORP DATE: 9-30-88 INSPECTED BY: G.K. DATE: 9-30-88

MAIN SIZE: 10 KIND: CIP DEPTH: 4' SER. TAP SIZE: 3/4

KIND OF CUT TOP BASE SIZE PAVE RESTORATION RUTH CORP

PAVE - STREET DIRT OR BERM PERMIT NO.

SIDEWALK BT DIRT 4.5x5 TEMP. DATE INSP. BY

TRELAWN DRIVEWAY CONTRACTOR: DATE INSP. INSP. BY

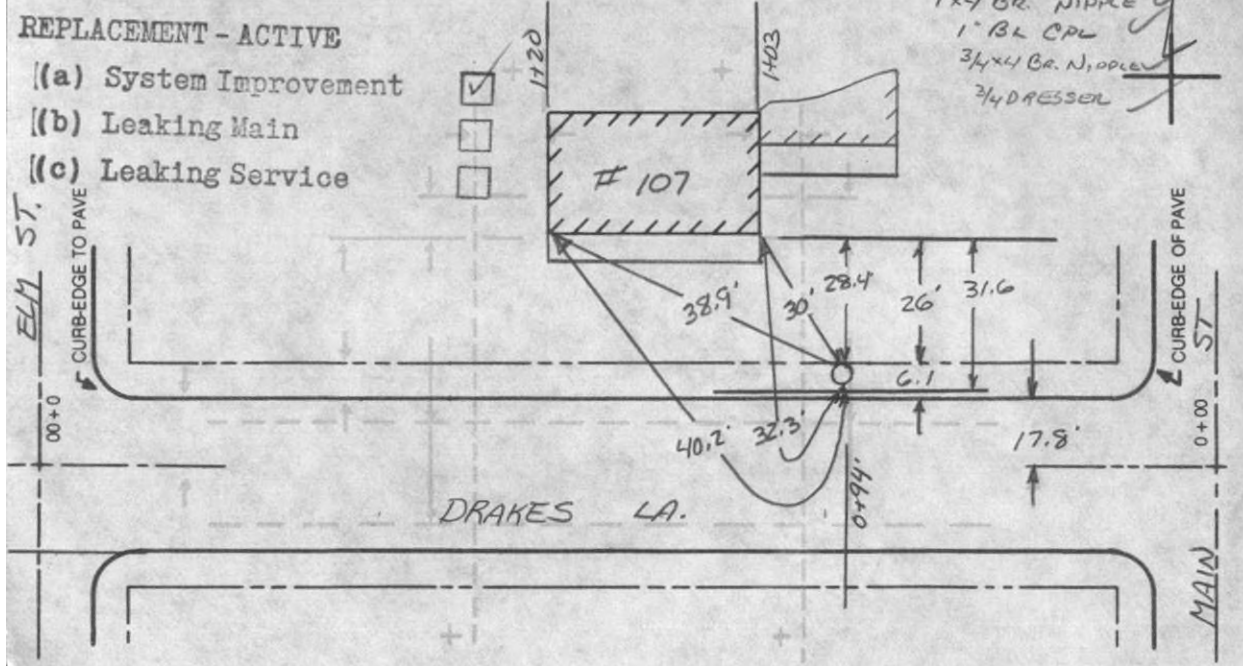
CUST. PROP. NO. BAR HOLES

BILLING INVOICE NO 10-3-88 C-040013 19:17 DATE

REMARKS: RESIDENTIAL SIZE MATERIAL USED QUANT.

<u>11-11</u>	<u>3/4</u>	CORPORATION	<u>1</u>
	<u>3/4</u>	PIPE (KIND) <u>PWT</u>	<u>3.2</u>
	<u>3/4</u>	CURB STOP <u>COMPXIPP</u>	<u>1</u>
<u>1051-61-3221</u>	<u>5</u>	CURB BOX & ROD	<u>1</u>

- REPLACEMENT - ACTIVE
- (a) System Improvement
 - (b) Leaking Main
 - (c) Leaking Service



RULES AND REGULATIONS**4. Service Pipes****3.6 Owner or Landlord Responsibility for Service (C)**

If a building is master metered, the Company may, at its discretion, require the building owner or landlord to establish a single account for the building at the master meter in the name of the building owner or landlord even where there are existing meters for individual tenants behind the master meter.

3.7 Acquired Customers (C)

Upon acquisition of a water system where the Company is already the wastewater service provider, the Customer of record for water service shall be the same as the Customer of record for wastewater service.

4.1 Right to Reject

The Company may refuse to connect with any piping system or furnish water through one already connected if such system is not properly installed and maintained. The Company may also refuse to connect, etc., if lead base materials as defined in the Safe Drinking Water Act have been used after June 19, 1988, in any plumbing beyond the Company's curb stop. It shall be the Customer's responsibility to provide the Company with such certification.

4.2 Stop and Waste Valve

The Customer shall install a stop and waste valve on the service pipe immediately inside of the foundation wall of the building supplied and also on the outlet side of the meter. A double check valve shall also be installed on the outlet side of the meter. Such valves should be so located as to be easily accessible to the occupants and to provide proper drainage for the pipes in the building.

4.3 Service Pipe Limitation

No fixture shall be attached to or any branch made in the service pipe between the meter and the street main. No extension of service shall be made by the Customer to provide water service to another premise.

4.4 Trench Restriction

No service pipe shall be laid in the same trench with gas pipe, sewer pipe, electric cable, telephone cable or any other facility of a public service company, nor within three (3) feet of any open excavation or vault.

4.5 Service Pipe Specifications

The Company may specify the size, kind, quality and depth of the materials which shall be laid between the curb valve and the structure on the premise to be supplied. The Company may also disapprove any plumbing materials used within the premise to be supplied.

[Rules 4.6 and 4.7 moved to following page] (C)

(C) means Change

RULES AND REGULATIONS

4. Service Pipes (cont'd)

[Rules 4.6 and 4.7 moved from preceding page]

(C)

4.6 Check Valve, Backflow Prevention Device and Service Pipe Strainers

A minimum of an approved American Society of Sanitary Engineering 1024 (ASSE 1024) dual check valve shall be installed on all service pipes for residential service. Residential accounts having a lawn irrigation system or fire sprinkler system will be required to install a reduced pressure zone backflow prevention device on the line which services this part of the customer's system. Reduced pressure zone devices are to be tested and/or repaired annually. On service pipes for commercial or industrial service, a backflow prevention device of a type approved by the Company shall be installed. The location of the double check valve or backflow prevention device shall be approved by the Company. Service pipes used for fire protection must in addition have an approved fire service pipe strainer. The double check valve and backflow prevention device shall be owned and maintained by the Customer. Non-residential Customers shall certify annually, in writing to the Company, that these devices have been maintained and are in working order. This is to include a test and /or repairs performed by an inspector who is a certified backflow prevention device tester. They are also subject to Company inspection at reasonable times. A backflow prevention device tester must be certified by an entity that performs training to test and repair Check valves and backflow prevention devices which meet or exceed American Society of Sanitary Engineering (ASSE), American Backflow Prevention Association (ABPA) or equivalent standards and provides certification that such training has been completed in accordance with these requirements.

4.7 Pressure Regulators

When the static pressure is 100 lbs. or more at the Customer's premise, the Customer shall be responsible for the installation and maintenance of a pressure regulator or valve, which shall be installed on the inlet side of the meter.

4.8 Water use Standards for Plumbing Fixtures

The Company may refuse to connect with any piping system or furnish water through one already connected in any new construction or renovation which does not comply with the Company's water use standards for plumbing fixtures.

4.9 Customer Responsibility for Service Pipe

The Customer shall have full responsibility for the installation, repair, replacement, and maintenance of all Service Pipes, including full responsibility for metered water usage attributable to a leak in the Service Pipe; The failure of a Customer to properly install and maintain a Service Pipe, including replacement, shall constitute grounds for the Company to initiate action to terminate service to the Customer and seek recovery for any damage to the Company's facilities caused by an improperly functioning Service Pipe. Where an undetected, non-surfacing, underground leak is found in a Customer's Service Pipe, the Company shall credit the Customer with a one-time bill adjustment equal to forty percent (40%) of that portion of one month's consumption that exceeds the average monthly usage, based on the prior twelve month period, upon proper verification that the leak has been repaired. The Company shall require documentation to establish, to the Company's satisfaction, the existence of such repaired leak at the Customer's premises. Such bill adjustment will be provided only to the extent the Customer has not received a bill adjustment for an undetected, non-surfacing, underground leak at the same premises in the past five (5) years.

(C) means Change