
Claudio Waller, |
v. | Docket No.: C-2025-3053079
PECO Energy Company |
|
Initial Call-In |
Telephonic

Pages 1 - 56

Judge's Chambers
State Office Building
801 Market Street
Philadelphia, PA

Thursday, May 1, 2025
Commencing at 10:04 a.m.

INDEX TO EXHIBITS

Docket No. C-2025-3053079

Hearing Date: May, 1, 2025

<u>NUMBER</u>	<u>FOR IDENTIFICATION</u>	<u>IN EVIDENCE</u>
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Letter		
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1/15/25 Denial Letter		

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One Call Law

PECO's Exhibit 4 45 51

Dig Tickets



Direct Dial: 267-533-1830
khadijah.scott@exeloncorp.com

April 25, 2025

VIAE-MAIL

Honorable Alphonso Arnold, III, ALJ
Pennsylvania Public Utility Commission
801 Market St., Ste. 4063
Harrisburg, PA 19107

RE: Claudio Waller v. PECO Energy Company
Docket No. C-2025-3053079
Date of Hearing: May 1st, 2025 @ 10:00 a.m.

Dear Judge Arnold:

Enclosed please find a copy of PECO Energy Company's Exhibits 1 through 4, which it intends to use in the above referenced hearing. By copy of this letter, I am sending a copy of same to the Complainant.

Please call my direct dial number if you have any questions regarding this case.

Respectfully submitted,

A handwritten signature in blue ink that reads "Khadijah Scott".

Khadijah Scott

KS/ab
Enclosure

Cc: Claudio Waller (via email)

EXHIBIT 1



Dear PECO Customer:

At PECO, we are committed to providing safe and reliable energy service for our customers and the communities we serve. As part of that commitment, we will be upgrading and installing new equipment to enhance the local natural gas infrastructure in your neighborhood.

About the Project:

- We will be replacing the existing natural gas equipment to enhance service in your neighborhood. This includes installing new underground pipe, which is more durable, enhances safety and improves service reliability.
- **Work is expected to begin on or after 7/15/2024 on Spring Mill Rd from Wrenfield Way to Conshohocken State Rd**
- **Work will be completed on Monday through Friday from 9AM-3:30PM.**
- **The project is expected to be completed in December of 2024.**
- **This work will be performed by Utility Line Services, a qualified PECO contractor. If you have any questions or to schedule an appointment, please contact Josh Cousens of Utility Line Services at 267-473-7149. If you are not the owner of the building, please forward this written notice to the owner of the building.**

Most of the work will be performed outdoors, but to safely connect your property to the new natural gas main, PECO or a PECO contractor will need to turn off natural gas service and then enter your property to relight your appliances after the connection. We will need access to the natural gas appliances or equipment in your home so we can perform this work and later that day to restore service and relight any appliances. At this time, we will also be relocating any indoor natural gas meters to the exterior of the building to a location that is above-ground and is as close as practical to the existing indoor location.

This relocation work is necessary for the safety of our employees, contractors, customers, and communities and is mandated by the Pennsylvania Public Utility Commission.

Prior to work beginning, customers should mark any customer owned facilities present on the property. Examples of customer owned facilities include, but are not limited to, water services, sewer laterals, septic tanks, underground cable, drainage pipe, security lines, private lighting, dog fences, and sprinkler systems.

Maintaining Safety:

- For the safety of our crews, customers, and communities, all crews and contractors will be practicing social distancing, and we ask that all customers do the same.
- PECO crews and contractors will be following safety protocols, including wearing additional protective equipment.
- To ensure a safe environment when indoors, employee and contractor crews will wipe down all surfaces where the work is being performed before and after completing the work.

This work may occur in roadways as well as on sidewalks and potentially on your property. We will also work closely with local officials to minimize the impact on traffic and pedestrians whenever possible.

Any areas impacted on your property will be repaired, the streets will be repaved, and all areas will be restored to their original condition.

If you have any other questions about this work and/or would like to provide any supplemental information, please call PECO Work Inquiries (610) 832-6420 or email GasWorkInquiries@exeloncorp.com.

If you are not currently using natural gas and are interested in learning more about the conversion process, please call PECO New Business (866) 685-5665.

For general utility questions, you may also contact Pennsylvania Public Utility Commission, Bureau of Consumer Services at (800) 692-7380.

Sincerely,

Amy Hamilton
Vice President, PECO Gas Operations

EXHIBIT 2

UTILITY

LINE SERVICES

January 16, 2025

Claudio Waller
[REDACTED] N. Spring Mill Road
Villanova, Pa. 19085

RE: Sensor Wire to Front Gate
Date of Loss: Unknown When Damage Occurred

Dear Mr. Waller,

This letter will serve to advise that we have reviewed your claim for damage in connection with the above captioned matter in addition to completing an internal review of our documentation, which included the scope of work performed by our staff at the property in November, 2024. Part of our review consisted of whether in fact our employees followed proper protocol by contacting Pennsylvania One Call (POC) to have all facilities properly marked out and located prior to the commencement of our work. The proper calls were made and the responses of the facilities owners were received.

On or around November 18, 2024, while meeting with representatives from Utility Line Services (ULS) and PECO at your property, you were given the enclosed letter requesting you to mark all customer owned facilities present on the property prior to work beginning. Our work began on November 26, 2024. An unmarked Verizon line was damaged. The facility owner responded to ULS' POC inquiry that the area was 'clear, no facilities' when in fact there were Verizon wires installed underground. Proper notifications were made to POC and Verizon responded to the property to repair the facility. On December 13, 2024, you contacted ULS regarding damage to the sensor wire to your entrance gate. ULS had no knowledge of this privately owned wire and was unaware that we damaged it.

Based on our review, Utility Line Services cannot assume responsibility for the unmarked sensor wire. If we had any indication of the location of the wire, we would have looked for it using prudent measures. At no time during the installation of the gas service did our crew see the sensor wire. We were informed the gate was not working approximately two weeks after we completed our work on your property. I regret to advise that Utility Line Services cannot assume responsibility for the repair or replacement of the sensor wire or gate system and cannot confirm we damaged it.

Sincerely,

Brigitte Stokes
Claims Manager
610-239-0900 x 119

EXHIBIT 3

Underground Utility Line Protection Law
AKA PA One Call Law

RESPONSIBILITIES OF THE FACILITY OWNER

SECTION 2. It shall be the duty of each facility owner:

(5) After receipt of a timely request from an excavator or operator who identifies the work site of excavation or demolition work he intends to perform and not later than the business day prior to the lawful start date of excavation:

(i) 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. This shall be done to the extent such information is available in the facility owner's records or by use of standard locating techniques other than excavation. Standard locating techniques shall include, at the utility owner's discretion, the option to choose available technologies suitable to each type of line or facility being located at the work site, topography or soil conditions or to assist the facility owner in locating its lines or facilities, based on accepted engineering and operational practices. **Facility owners shall make reasonable efforts during the excavation phase to locate or notify excavators of the existence of any known lines and abandoned lines.**

(i.1) To identify the location of an actually known facility's point of connection to its facilities, where the point of connection is not owned or operated by the facility owner. A facility owner may identify the location of a known facility connected to its facilities, but not owned or operated by the facility owner, as a helpful guide to the excavator or owner. The identification shall not be deemed to impose any liability upon the facility owner for the accuracy of the other facility's identification.

(i.2) To document communications between a facility owner and the excavator to ensure that the excavator is aware of a facility owner's inability to locate its facilities.

(i.1) To identify the location of an actually known facility's point of connection to its facilities, where the point of connection is not owned or operated by the facility owner. A facility owner may identify the location of a known facility connected to its facilities, but not owned or operated by the facility owner, as a helpful guide to the excavator or owner. The identification shall not be deemed to impose any liability upon the facility owner for the accuracy of the other facility's identification.

EXHIBIT 4

ADDRESS	Original Submission Date	PennDOT Permit Number	Lawful Start Dates																	
			7/3 - 7/15	7/15 - 7/24	7/24 - 8/2	8/2 - 8/13	8/13 - 8/22	8/23 - 9/4	9/3 - 9/12	9/12 - 9/23	9/23 - 10/2	10/3 - 10/15	10/16 - 10/25	10/25 - 11/5	11/6 - 11/18	11/18 - 11/27	11/27 - 12/10	12/10 - 12/19	12/19 - 12/31	12/31 - 1/10
			Ticket #																	
Spring Mill Rd - Ridgewood Rd to Morris Ave	6/28/2024		20241801518	20241922759	20242011980	20242123944	20242212815	20242334227	20242414093	20242533915	20242623223	20242741730	20242843317	20242962276	20243063064	20243182330	20243272069	20243401847	20243512511	20243611332
Spring Mill Rd - Morris Ave to Mt Pleasant Rd	6/28/2024		20241801631	20241922763	20242011984	20242123946	20242212819	20242334228	20242414097	20242533918	20242623229	20242741734	20242843322	20242962286	20243063072	20243182334	20243272071	20243401853	20243512515	20243611334
Spring Mill Rd - Mt Pleasant Rd to Pinewood Rd	6/28/2024		20241801681	20241922764	20242011987	20242123950	20242212823	20242334232	20242414099	20242533922	20242623233	20242741741	20242843326	20242962290	20243063076	20243182335	20243272074	20243401856	20243512533	20243611335
Spring Mill Rd - Pinewood Rd to Conshohocken State Rd	6/28/2024		20241801726	20241922767	20242011990	20242123954	20242212826	20242334234	20242414101	20242533925	20242623239	20242741752	20242843328	20242962293	20243063081	20243182340	20243272076	20243401865	20243512540	20243611339