



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

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

June 25, 2025

Via Hand Delivery

Matthew L. Homsher, 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.
A. Liberoni Inc.
Docket No. C-2025-
I&E Formal Complaint (Damage Prevention)

RCVD PUC SEC BUR
JUN 25 2025 AM 9:38

Dear Secretary Homsher:

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,

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

GR/ac
Enclosures

cc: Michael L. Swindler, Deputy Chief Prosecutor, I&E-Enf (*via email – mwindler@pa.gov*)
Robert Horensky, Manager, Safety Division (*via email – rhorensky@pa.gov*)
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.

In Addition to filing your Answer with the Commission's Secretary, 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, if any, 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:

Matthew L. Homsher, 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

RECEIVED

JUN 25 2025

Pennsylvania Public Utility Commission,
Bureau of Investigation and Enforcement,
Complainant

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

v.

Docket No. C-2025-

A. Liberoni 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 29, 2024, P.L. 1106, No. 127, 73 P.S. § 182.8(c)(2), and files this Formal Complaint ("Complaint") against A. Liberoni Inc. ("A. Liberoni" or "Respondent") alleging violations of the PA One Call Law in connection with a strike on a gas line operated by Peoples Gas Company LLC ("Peoples Gas") while excavating on October 15, 2024, in the vicinity of 4738 Sylvan Avenue in the City of Pittsburgh, Allegheny County, Pennsylvania. 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*, excavators, within the Commonwealth pursuant to the PA One Call Law, Act of October 29, 2024, P.L. 1106, No. 127, 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 attorney is as follows:

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

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

4. Respondent is A. Liberoni Inc., with a main mailing address of 459 Davidson Road, Plum, PA 15239.

5. A. Liberoni is an "excavator," as that term is defined in Section 176 of the PA One Call Law, 73 P.S. § 176.¹

6. Section 180 of the PA One Call Law, 73 P.S. § 180, imposes duties on excavators.

7. Specifically, Section 180(3) of the PA One Call Law, 73 P.S. § 180(3), requires excavators to "take reasonable steps to work with facility owners, including scheduling and conducting a preconstruction meeting, so that they may locate their facilities at a time reasonably in advance of the actual start of excavation or demolition work for each phase of the work." 73 P.S. § 180(3).

¹ "Excavator" is defined as any person who or which performs excavation or demolition work for himself or for another person." 73 P.S. § 176. "Excavation work" is defined as "the use of powered equipment or explosives in the movement of earth, rock or other material, and includes, but is not limited to, anchoring, augering, backfilling, blasting, boring, digging, ditching, drilling, driving-in, grading, plowing-in, pulling-in, ripping, scraping, trenching and tunneling." *Id.*

8. Section 180(4) of the PA One Call Law, 73 P.S. § 180(4), requires excavators to “exercise due care and to take all reasonable steps necessary to avoid injury to or otherwise interfere with all lines where positions have been provided to the excavator by the facility owners.” Further, “[w]ithin the tolerance zone the excavator shall employ prudent techniques, which may include hand-dug test holes, vacuum excavation or similar devices to ascertain the precise position of such facilities.” 73 P.S. § 180(4).

9. Section 180(8) of the PA One Call Law, 73 P.S. § 180(8), requires excavators to “immediately notify 911 and the facility owner if the damage results in the escape of any flammable, toxic or corrosive gas or liquid which endangers life, health or property.”² 73 P.S. § 180(8).

10. A “complex project” is defined in the PA One Call Law as “an excavation that involves more work than properly can be described in a single locate request or any project designated as such by the excavator or facility owner as a consequence of its complexity or its potential to cause significant disruption to lines or facilities and the public, including excavations that require scheduling locates over an extended time frame.” 73 P.S. § 176.

11. A “preconstruction meeting” is defined as a “scheduled event held by the excavator, designer, project owner and facility owner, or an agent of the excavator, designer, project owner and facility owner, prior to the commencement of excavation or demolition work in a complex project.” 73 P.S. § 176.

12. The “tolerance zone” is defined as “the horizontal space within eighteen inches of the outside wall or edge of a line or facility.” 73 P.S. § 176.

² This subsection has since been amended to remove the clause “which endangers life, health or property.” See Act of October 29, 2024, P.L. 1106, No. 127, § 5.

13. Respondent, as an excavator, 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 excavators to comply with the PA One Call Law. 73 P.S. § 182.10.

14. 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 excavators 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.

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

16. 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).

17. 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

18. On October 15, 2024, A. Liberoni was excavating as part of reconstruction work for a sidewalk and street in the vicinity of 4738 Sylvan Avenue, City of Pittsburgh, Allegheny County, when it struck a marked 1-inch gas service line operated by Peoples Gas. I&E Exhibit 1.

19. A. Liberoni was excavating pursuant to a valid, routine excavation locate request, serial number 20242253774. A locate request is also known as "Ticket." I&E Exhibit 2.

20. Ticket 20242253774 was submitted by A. Liberoni on August 12, 2024, had a lawful start date of between August 15, 2024, and August 26, 2024, and was scheduled to last four months. Id.

21. The project designer, Michael Baker International ("MBI"), had submitted a Final Design Ticket to the Pennsylvania One Call System ("POCS"), in conformity with the PA One Call Law.

22. In its Design Ticket, MBI described the project's scope as "street and sidewalk reconstruction on Sylvan from Hazelwood Ave. to Home Rule St. Work will extend approximately 50 [feet] on Hazelwood Avenue." I&E Exhibit 3.

23. The length of Sylvan Road between Home Rule Street and Hazlewood Avenue is approximately 2,100 feet.

24. After being prompted to do so by the Damage Prevention Section, A. Liberoni submitted an Alleged Violation Report ("AVR") to the Commission on November 19, 2024. In its AVR, A. Liberoni described the work area as being "2,000 feet."

25. Because A. Liberoni's months-long excavation project encompassed "more work than properly can be described in a single locate request," 73 P.S. §176, as evidenced by the Routine Excavation Ticket submitted by Respondent, the project designer's Design Ticket, and Respondent's AVR, described *infra* in Paragraphs 19 through 23, Respondent was obligated to hold a preconstruction meeting.

26. However, no preconstruction meeting was held by A. Liberoni.

27. During its excavation, and specifically on the date that the line strike occurred, October 15, 2024, A. Liberoni used powered excavation equipment to dig a trench directly over the marked gas line operated by Peoples Gas. I&E Exhibit 4.

28. The strike on the gas service line operated by Peoples resulted in the escape of natural gas which endangered life, health, and property. The gas service to one customer was interrupted.

29. A. Liberoni failed to immediately notify 911 of the gas leak caused by its strike on the gas service line.

30. On February 18, 2025, a copy of the report prepared by the Damage Prevention Investigator (“DPI”) from the Commission’s Bureau of Investigation and Enforcement, Damage Prevention Section, was mailed to A. Liberoni informing Respondent that it was in violation of the PA One Call Law by failing to hold a preconstruction meeting for a complex project, failing to file an AVR, failing to immediately notify 911 of a line strike resulting in the escape of flammable, toxic, or corrosive gas or liquid dangerous to life, health, or property, and failing to exercise due care and employ prudent excavation techniques.

31. In the letter from the DPI, the Respondent was informed that it could either accept the findings and pay the assessed administrative penalty or reject the DPI report and present its case before the Damage Prevention Committee (“DPC”) by informing the DPI in writing of its rejection within thirty days of the date of the letter.

32. On February 26, 2024, A. Liberoni rejected the findings in the DPI’s report and requested to present its case before the DPC.

33. On March 21, 2025, a notice of the DPC meeting was sent to A. Liberoni, informing Respondent that it could present its case for discussion at the April 15, 2025, DPC meeting.

34. Respondent appeared before the DPC to present its case at the April 15, 2025, meeting, and its case was discussed and voted upon.

35. On April 15, 2025, a copy of the DPC's Informal Determination accepting the DPI's report and proposed administrative penalty was mailed to A. Liberoni, informing Respondent that it could either accept the DPC's Informal Determination or reject it in writing within thirty (30) days of the date of the notification letter, and that if the Informal Determination is rejected the case may be sent to I&E prosecutory staff for issuance of a formal complaint.

36. On the same day, April 16, 2025, Respondent rejected the DPC's informal determination via email.

III. VIOLATIONS

37. Paragraphs 1-36 are incorporated herein as if stated in their entirety.

Count 1 — Failure to Hold a Preconstruction Meeting

38. Respondent failed to hold a preconstruction meeting prior to beginning excavation on its complex project.

If proven, this is a violation of Section 180(3) of the PA One Call Law, 73 P.S. § 180(3). As an excavator, Respondent was required to schedule and conduct a preconstruction meeting for a complex project so that facility owners may locate their facilities at a time reasonably in advance of the actual start of excavation or demolition work for each phase of the work.

A complex project is "an excavation that involves more work than properly can be described in a single locate request." 73 P.S. § 176. As evidenced by the fact that Respondent's Routine Excavation PA One Call Ticket for excavation work was projected to last four months, and that both A. Liberoni and MBI, the project designer, identified the length of the project as approximately 2,000 feet, this project was a complex project as defined by the PA One Call Law. Respondent was therefore obligated to schedule and conduct a preconstruction meeting, which it failed to do.

The Bureau of Investigation and Enforcement's proposed administrative penalty for this violation is \$500.

Count 2 — Failure to Exercise Due Care and Avoid Interference with Lines

39. Respondent failed to exercise due care and to take all reasonable steps necessary to avoid injury to or otherwise interfere with facility owners' lines. While in the tolerance zone the excavator shall employ prudent techniques, which may include hand-dug test holes, vacuum excavation or similar devices to ascertain the precise position of such facilities.

If proven, this is a violation of Section 180(4) of the PA One Call Law, § 180(4), 73 P.S. § 180(4).

On October 15, 2024, Respondent damaged a gas line while excavating. The damage resulted in a gas leak. A photograph shows that Respondent excavated a trench directly over the marked gas line operated by Peoples Gas.

By using powered excavation equipment directly over top of the gas line, and by failing to utilize other less invasive techniques such as vacuum excavation or hand-dug test holes to uncover the precise location of the gas line, Respondent failed to exercise due care and take all reasonable steps necessary to avoid injury to or otherwise interfere with underground utility lines.

The Bureau of Investigation and Enforcement's proposed administrative penalty for this violation is \$1,000.

Count 3 — Failure to Immediately Notify 911 of a Gas Leak

40. Respondent failed to immediately notify 911 if the damage results in the escape of any flammable, toxic or corrosive gas or liquid which endangers life, health or property.

If proven, this is a violation of Section 180(8) of the PA One Call Law, § 180(8), 73 P.S. § 180(8).

During its excavation, Respondent struck and damaged a gas service line. The line strike resulted in a leak of natural gas. However, Respondent failed to call 911 to alert emergency services of the line strike and subsequent gas leak.

The Bureau of Investigation and Enforcement's proposed administrative penalty for this violation is \$2,000.

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

- (1) Find A. Liberoni Inc. to be in violation of the PA One Call Law at 73 P.S. §§ 180(3), 180(4), and 180(8);
- (2) Impose a cumulative administrative penalty upon A. Liberoni Inc. in the amount of \$3,500;
- (3) Order A. Liberoni Inc. to attend Online Compliance Training through the Pennsylvania One Call System for excavators and provide proof of compliance to the Commission within 30 days of the entry of a Final Commission Order; and
- (4) Order such other remedies as the Commission may deem appropriate.
- (5) If payment of the administrative penalty is not made as directed, the Bureau of Investigation and Enforcement requests that this matter be referred to the Pennsylvania Office of the Attorney General for collection and any other appropriate action.

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: June 25, 2025

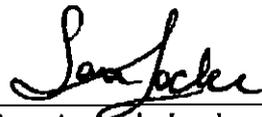
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement,	:	
Complainant	:	
	:	
v.	:	Docket No. C-2025-
	:	
A. Liberoni 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: June 25, 2025



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

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JUN 25 2025

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

I&E Exhibit 1

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**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**



Alleged Violation Report

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

AVR Number AVR2024OCT170023

AVR Version 1

First Name MARCUS **Last Name** PETRISEK

Company Name PEOPLES GAS COMPANY LLC

Address 261 CENTER ST

City MCKEESPORT

State PA

Zip Code 15132-2401

Email MARCUS.PETRISEK@PEOPLES-GAS.COM **Phone** 4125776227

Ext

Role

- Submitter Role(s) (?)**
- Facility Owner
 - Excavator
 - Locator
 - Other
 - Designer
 - Project Owner
 - Enforcement Agency

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 (?) Excavator Issue

Reason Failed to exercise due care and take all reasonable steps necessary to avoid injury to or interference with all lines §2(5) §5(4)

Type of Alleged Violation (?) Excavator Issue

Reason Failed to use prudent techniques in the tolerance zone §5(4)

When did the alleged violation occur? (?) 10/15/2024

08:00:00 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. 20242253774

Related Damage Serial Number, if applicable

Other Related Serial Numbers (?)

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

Reason for Exemption

Event Information



County ALLEGHENY
Municipality PITTSBURGH CITY
Ward 15
Work Site SYLVAN AVE
Nearest Intersection TULLYMET ST
Second Intersection HAZELWOOD AVE
Geolocation (?)

Affected Facility Information



Primary Right of Way Type
Public Right of Way Type
Private Right of Way Type

Affected Operation Gas
Facility Subtype Affected Service/Drop/Lateral
Facility Owner Company Name Peoples Gas
Contact First Name Marcus Last Name Petrisek
Address 261 Center St

City McKeesport
State PA
Zip 15132
Email marcus.petrisek@peoples-gas.com Phone 412-577-6227

Joint Trench? Yes No Unknown

Involve Cross Bore? Yes No Unknown

Measured Depth from Grade

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

Work Information

Start Date of Excavation (?)

Excavation Activity CURB/SIDEWALK

Excavator Company Name A LIBERONI

Contact First Name Last Name

Address 459 DAVIDSON RD

City PLUM

State PA

Zip 15239

Email Phone

Marked in White Yes No Unknown

Method of Excavation DIGGING

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

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 PennDOT

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 (?)

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? 1 - < 6 hrs

Exact Value of Service Interruption

Approximately how many customers were affected? 1

Exact Number of Customers Affected

Cost of Damaged Line Repair?

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? Employee Locator

Locator Company

Contact First Name Last Name

Address

City

State

Zip

Email Phone

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? Paint
(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 If this incident involved any locating/markng 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 A LIBERONI working for PennDOT was using mechanized equipment in the tolerance zone and struck and damaged a properly marked Peoples Gas line. A LIBERONI has struck multiple Peoples Gas lines while working on this project. If more space is needed, attach additional pages or documents.

Attachments 4738 Sylvan Ave.JPG 8.79MB Attach pictures and additional documents

Submit Date 10/17/2024

Compliance Update

Research Result Listed tickets found Additional tickets found No tickets found

Additional Tickets Found

Additional Serial Numbers 20232013477

Ticket Attachment 4475007_report.pdf 558.42KB

Comments

I&E Exhibit 2

RECEIVED

JUN 25 2025

**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**

CDC 00000 POCs MM/DD/YY TT:TT:TT 20242253774-000 UPDT XCAV RTN

=====PENNSYLVANIA UNDERGROUND UTILITY LINE PROTECTION REQUEST=====

Serial Number--[20242253774]-[000] Channel#--[1516AWEB][0023][2019-08]
Message Type--[UPDATE][EXCAVATION][ROUTINE]

County--[ALLEGHENY] Municipality--[PITTSBURGH CITY] Ward--[15]

Work Site--[SYLVAN AVE]
Nearest Intersection--[TULLYMET ST]
Second Intersection--[HAZELWOOD AVE]
At Intersection--[N] Between Intersections--[Y] Site Marked in White--[Y]
Subdivision--[]

Location Information--
[WORKING ON SYLVAN AVE FROM TULLYMET ST TO HAZELWOOD AVE. WORKING IN THE
SIDEWALK AND ROAD TO INSTALL NEW INLETS SEWER PIPE SIDEWALK CURB AND ROAD
BASE.]

Caller,Lat/Lon--[]
Mapped Type--[P] Mapped Lat/Lon--
[40.415343/-79.943745,40.415475/-79.943588,40.411855/-79.941573,
40.411751/-79.941798]

Attachments--[http://www.pa811.org/attachments/20242253774]
Type of Work--[REPLACE INLET] Depth--[10 FEET]

Extent of Excavation--[] Method of Excavation--[POWER EQUIP]

Equip Type--[EXCAVATOR]
Street--[X] Sidewalk--[X] Pub Prop--[] Pvt Prop--[] Other--[]

Private Front--[] Rear--[] Left--[] Right--[]

Lawful Start Dates--[15-Aug-24] thru [26-Aug-24] Response Due Date--[14-Aug-24]
Scheduled Excavation Date--[15-Aug-24] Dig Time--[0700] Duration--[4 MONTHS]

Caller--[RYAN SUMMERS]
Caller Phone--[412-798-3098]
Excavator--[A LIBERONI]
Address--[459 DAVIDSON RD]
City--[PLUM] State--[PA] Zip--[15239]
FAX--[] Caller Type--[B]
Email--[RSUMMERS@LIBERONI.COM]
Work For--[PENNDOT]
Onsite Contact--[RAY FURTIVO]
Onsite Contact Phone--[412-287-3465]
Best Time to Call--[0700-1700 M-F]
Onsite Contact Email--[RSUMMERS@LIBERONI.COM]
Job Number--[23115]

Prepared--[12-Aug-24] at [1517] by [RSUMMERS]

Remarks--
[*****== UPDATE 20241200987-000 --8/12/2024 1517 RSU WEB=====]
UPDATE REQUESTED BY: RYAN SUMMERS
REASON FOR UPDATE: WORK IN PROGRESS
REMARK LINES.]

AL 0 AL =PEOPLES GAS BD 0 BD =VERIZON PA ~ CB 0 CB =PGH WTR & SWR
CPE0 CPE=PGH MOB & INFRA DC 0 DC =DUQ LIGHT PGH PGH0 PGH=COMCAST CABLE

Serial Number--[20242253774]-[000]
===== Copyright (c) 2024 by Pennsylvania One Call System, Inc. =====

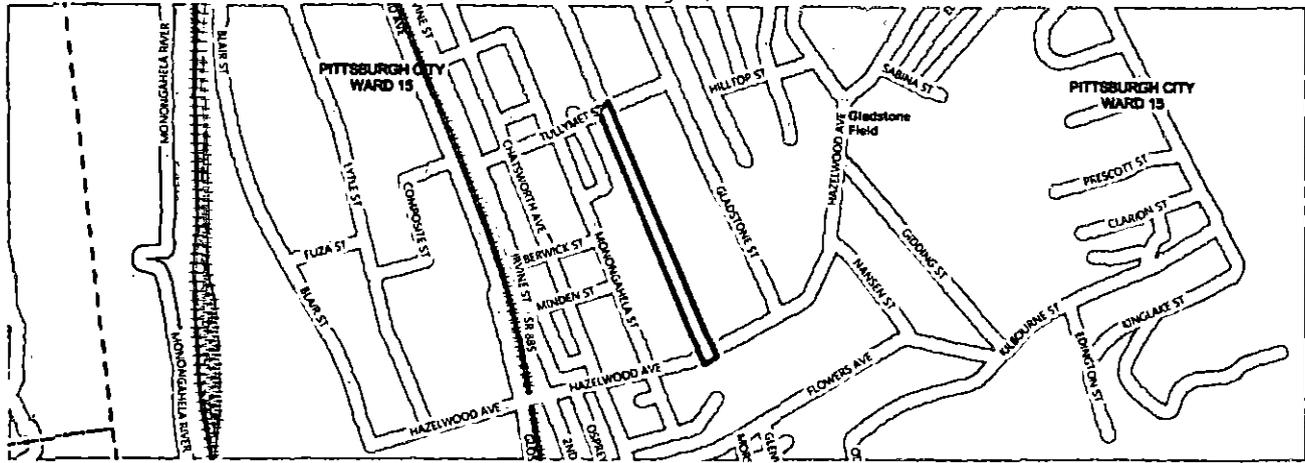
RESPONSES for S/N: 20242253774:

Ver	CDC	Name	Response	Time	Respondent
0	PGH	COMCAST CABLE COMMUNICATIONS INC	PGH-CLEAR. NO FACILITIES OR FACIL NOT INVOLVED	8/12/2024 3:48:36 PM	CLS-WEBSVC
0	DC	DUQUESNE LIGHT COMPANY	DC-CLEAR. NO FACILITIES OR FACIL NOT INVOLVED	8/12/2024 4:03:01 PM	AAA-WEBSVC
0	CPE	PITTSBURGH CITY DEPT OF MOBILITY & INFRASTRUCTURE	CPE-CLEAR. NO FACILITIES OR FACIL NOT INVOLVED	8/13/2024 8:38:56 AM	DS-WEB
0	BD	VERIZON PENNSYLVANIA LLC	BD-FIELD MARKED	8/13/2024 10:47:07 AM	AAA-WEBSVC
0	AL	PEOPLES GAS COMPANY LLC	AL-FIELD MARKED	8/14/2024 12:53:40 PM	AAA-WEBSVC
0	CB	PITTSBURGH WATER & SEWER AUTHORITY THE	CB-NO RESPONSE	8/15/2024 12:03:21 AM	Auto-KARL

DELIVERIES For S/N: 20242253774:

Ver	CDC	Name	To	Time	Seq	Type
0	WEBCFM	WEB CONFIRMATION QUEUE	WEBCFM	8/12/2024 3:17:35 PM	0	MAIL
0	PGH	COMCAST CABLE COMMUNICATIONS INC	PGH	8/12/2024 3:17:26 PM	29	MAIL
0	DC	DUQUESNE LIGHT COMPANY	DC	8/12/2024 3:17:26 PM	319	MAIL
0	CPE	PITTSBURGH CITY DEPT OF MOBILITY & INFRASTRUCTURE	CPE	8/12/2024 3:17:31 PM	79	MAIL
0	BD	VERIZON PENNSYLVANIA LLC	BD	8/12/2024 3:17:29 PM	429	MAIL
0	AL	PEOPLES GAS COMPANY LLC	AL	8/12/2024 3:17:25 PM	629	MAIL
0	CB	PITTSBURGH WATER & SEWER AUTHORITY THE	CB	8/12/2024 3:17:30 PM	80	MAIL

ATTACHMENT for S/N: 20242253774 (20242253774-0.gif):



I&E Exhibit 3

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JUN 25 2025

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

CDC 00000 POCS MM/DD/YY TT:TT:TT 20232013477-000 NEW XCAV DSGN

=====
Serial Number--[20232013477]-[000] Channel#--[1552AWEB][0288][2019-08]
Message Type--[NEW][EXCAVATION][FINAL DESIGN]

County--[ALLEGHENY] Municipality--[PITTSBURGH CITY] Ward--[15]

Work Site--[SYLVAN AVENUE]

Nearest Intersection--[HAZELWOOD AVENUE]

Second Intersection--[HOME RULE STREET]

At Intersection--[Y] Between Intersections--[N]

Subdivision--[]

Location Information--

[WORK WILL BE STREET AND SIDEWALK RECONSTRUCTION ON SYLVAN FROM HAZELWOOD
AVE TO HOME RULE ST. WORK WILL EXTEND APPROXIMATELY 50 ON HAZELWOOD
AVENUE.]

Caller Lat/Lon--[]

Mapped Type--[C] Mapped Lat/Lon--

[]

Attachments--[http://www.pa811.org/attachments/20232013477]

Type of Work--[STREET AND SIDEWALK RECONSTRUCTION] Depth--[0-8]

Extent of Excavation--[STREET & SIDEWA] Method of Excavation--[TRENCHING]

Equip Type--[EXCAVATOR]

Street--[X] Sidewalk--[X] Pub Prop--[X] Pvt Prop--[] Other--[]

Private Front--[] Rear--[] Left--[] Right--[]

Project Dates--[] thru [] Response Due Date--[03-Aug-23]

Scheduled Excavation Date--[DESIGN]

Caller--[BRAD DUDA]

Caller Phone--[412-269-6060]

Excavator--[MICHAEL BAKER CORPORATION INC]

Address--[100 AIRSIDE DRIVE]

City--[MOON TOWNSHIP]

State--[PA] Zip--[15108]

FAX--[]

Caller Type--[B]

Email--[BDUDA@MBAKERINTL.COM]

Work For--[MICHAEL BAKER CORPORATION INC]

Project Contact--[BRAD DUDA]

Project Contact Phone--[412-269-6060]

Best Time to Call--[0800-1700]

Project Contact Email--[BDUDA@MBAKERINTL.COM]

PennDOT Contract/Permit Number--[ECMS 112081]

CPA Project ID--[4475007]

Prepared--[20-Jul-23] at [1557] by [BDUDA]

Remarks--

[THIS IS THE FINAL DESIGN PHASE ONE CALL PRIOR TO RELEASING DOCUMENTS FOR
BIDDING. ALL UTILITY COORDINATION IS COMPLETE.]

ACPO ACP=ALLEGH CTY PWD AL 0 AL =PEOPLES GAS BD 0 BD =VERIZON PA
CB 0 CB =PGH WTR & SWR CPE0 CPE=PGH MOB & INFRA DC 0 DC =DUQ LIGHT PGH

Serial Number--[20232013477]-[000]

=====
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RESPONSES for S/N: 20232013477:

Ver	CDC	Name	Response	Time	Respondent
0	DC	DUQUESNE LIGHT COMPANY	DC-CLEAR. NO FACILITIES OR FACIL NOT INVOLVED	7/20/2023 4:02:42 PM	AAA-WEBSVC
0	CPE	PITTSBURGH CITY DEPT OF MOBILITY & INFRASTRUCTURE	CPE-CLEAR. NO FACILITIES OR FACIL NOT INVOLVED	7/21/2023 8:20:26 AM	DS-WEB
0	CB	PITTSBURGH WATER & SEWER AUTHORITY THE	CB-NO RESPONSE	8/4/2023 12:01:21 AM	Auto-KARL
0	CB	PITTSBURGH WATER & SEWER AUTHORITY THE	CB-ENGINEERING COMPLETED	8/4/2023 9:28:43 PM	JMC-WEBSVC
0	AL	PEOPLES GAS COMPANY LLC	AL-ENGINEERING COMPLETED	8/2/2023 6:17:29 AM	AAA-WEBSVC
0	ACP	ALLEGHENY COUNTY DEPT OF PUBLIC WORKS	ACP-CLEAR. NO FACILITIES OR FACIL NOT INVOLVED	7/21/2023 9:14:27 AM	MS-OTM
0	BD	VERIZON PENNSYLVANIA LLC	BD-NO RESPONSE	8/4/2023 12:01:21 AM	Auto-KARL
0	BD	VERIZON PENNSYLVANIA LLC	BD-CONFLICT. DCTF BY FO	8/23/2023 9:54:48 AM	AAA-WEBSVC

DELIVERIES for S/N: 20232013477:

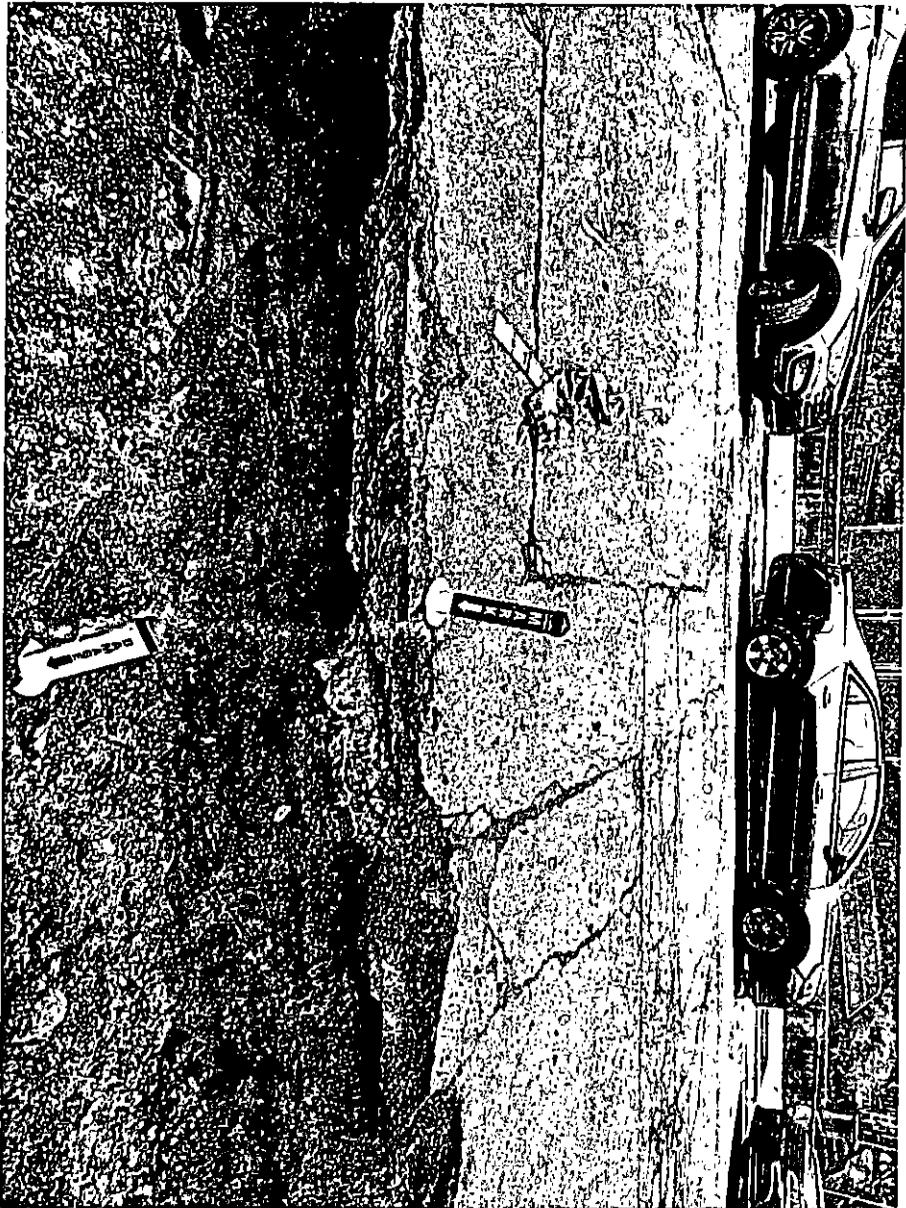
Ver	CDC	Name	To	Time	Seq	Type
0	WEBCFM	WEB CONFIRMATION QUEUE	WEBCFM	7/20/2023 4:00:03 PM	0	MAIL
0	DC	DUQUESNE LIGHT COMPANY	DC	7/20/2023 3:58:12 PM	357	MAIL
0	CPE	PITTSBURGH CITY DEPT OF MOBILITY & INFRASTRUCTURE	CPE	7/20/2023 3:58:19 PM	92	MAIL
0	CB	PITTSBURGH WATER & SEWER AUTHORITY THE	CB	7/20/2023 3:58:16 PM	103	MAIL
0	AL	PEOPLES GAS COMPANY LLC	AL	7/20/2023 3:58:12 PM	611	MAIL
0	ACP	ALLEGHENY COUNTY DEPT OF PUBLIC WORKS	ACP	7/20/2023 3:58:11 PM	52	MAIL
0	BD	VERIZON PENNSYLVANIA LLC	BD	7/20/2023 3:58:16 PM	489	MAIL

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**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**



**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission, Bureau of Investigation and Enforcement, Complainant	:	
	:	
	:	
v.	:	Docket No. C-2025-
	:	
A. Liberoni 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 Mail and Electronic Mail

A. Liberoni Inc.
Attn: Ryan Summers
459 Davidson Road
Plum, PA 15239
rsummers@liberoni.com

RCVD PUC SEC BUR
JUN 25 2025 AM 9:38



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: June 25, 2025