

June 27, 2025

Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Second Floor
Harrisburg, PA 17120

Dear Mr. Homsher:

Please see attached documents in support of Bill Whelan v. PECO (C-2025-3055566) and our formal complaint with the PUC.

First document is a copy of an email response to Scott Khadijah, PECO attorney.

Second document is an 8 page report from an underground utility company I hired, Underground Detective, to prove that PECO currently only has one gas line supplying both #7706 and #7704 Beech Lane, Wyndmoor, PA. Our property is #7706 Beech lane, and this report proves PECO has been supplying our neighbor with gas via our property and our gas service line.

PECO has never had an easement to use our property.

Thank you for looking into this matter.

Sincerely,

Bill Whelan

7706 Beech Lane

Wyndmoor, PA 19038



bill whelan <saltydog7707@gmail.com>

Bill Whelan v. PECO Energy Company (C-2025-3055566)

bill whelan <saltydog7707@gmail.com>

Sun, Jun 22, 2025 at 9:24 PM

To: "Botak, Amy:(PECO)" <Amy.Botak@exeloncorp.com>, "(PECO)" <Khadijah.Scott@exeloncorp.com>

Scott:

Here are my responses to your response.

PECO admits (see original PECO statement from my original informal complaint) that our neighbors at #7704 Beech Lane get their gas via a gas line on my property. No one disagrees with this statement. It is a fact.

There was no paperwork for an easement allowing PECO to use our property to supply gas to #7704 at our settlement in 2008 nor our neighbors at #7704 when they bought the house last year. I also contacted Springfield Township. They have no paperwork on an easement. This is another fact.

This also speaks to your response that this complaint is stale. If we had easement paperwork at settlement in 2008, then this complaint would be stale. However, that wasn't the case.

PECO has been generating gas revenues for #7704 from my property predating our settlement in 2008. This is another fact.

The contention between PECO and us was whether my neighbor had their own gas service line on my property. PECO says that is the case, and I have repeatedly said that the neighbors gas is supplied via my gas line.

The original #811 dig contractor sent out by PECO marked our property as one line with a section that branches off to #7704's gas meter. (See original photos in my complaint).

Since then there has been some back in forth between us, two PECO Foreman, a PECO customer service rep, an #811 rep, and the PUC.

PECO will not admit that they have one line that is split even though they admitted this verbally in November of 2023 to the excavator doing work for #7704 replacing their sewage line.

To put an end to this contention, I hired a utility line detection company. On 6/13/25 I met their tech at my home. He thoroughly scanned my front lawn (and #7704's lawn) and marked the gas line accordingly. He supplied me with his report along with photos and the necessary documentation. I was watching and asking questions the entire time.

The results: there is only one gas line. That gas line is on my property. There is a section of gas line that is spliced/split from my gas line to #7704. I will either forward this report to the secretary of the PUC or I'll hold on to it until the hearing.

It's possible that PECO has a blue print of where the lines should be, but in actuality, and I can prove this, there is just one line. PECO is either not being truthful or they are mistaken.

I can now prove that there is only one gas line, but that doesn't change the fact that PECO has generated natural gas revenues from our property since 2008 and beyond without permission.

In order to fix this problem, we want the spliced section of line removed and the yard restored afterwards. And, we want to be compensated for the use of our property since we moved in in 2008. Obviously, this will require PECO to install a new gas service line on #7704's property to supply them the gas they have been receiving via our property.

We are happy to take our case to be heard in front of a judge especially with the paperwork we now have from the utility marking company.

Regards,
Bill Whelan
[Quoted text hidden]

RCVD PUC SEC BUR
JUN 30 2025 AM 10:52



Utility Locate Scan

RCVD PJC SEC BUR
JUN 30 2025 AM 10:52

Utility Locate Scan

Company Info

THIS IS NOT AN INVOICE
The Underground Detective Headquarters
9192 Colerain Ave
Cincinnati, OH 45251
888-747-3799
www.UgDet.com
THANK YOU!

Bill To

Bill Whelan

Work Order Number

00224287

Job Location

7706 Beech Ln., Wyndmoor, PA 19038

Email Address

Saltydog7707@gmail.com

Email Address 2

Email Address 3

Utilities Located

Gas

Other

Area(s) Scanned

Grass

Other

Equipment Used

Electromagnetic

Description & Additional Information

Arrived onsite and met with Bill. Explained that neighbor's gas service was coming onto his property (found this out after it was hit by a contractor working on the neighbor's property) and was wanting to know if there was 2 separate lines, or, if the neighbor's line tapped into his service (prior to the meter). I started by direct connecting to the tracer wire on his gas meter. Marked his gas down the front yard and to the street. The neighbors gas meter did not have a tracer line. I direct connected to the steel on the meter and I did get a signal on it. I followed the signal and it went over to Bill's gas service where the signal then ended. I did not get any signal going down the yard and to the street, where the main is located. I got a depth of 1'4" where the neighbor's service ends at his. When I reconnected at Bill's service, I got a depth of 1'5" where the neighbor's service meets his. If there was a 2nd line, I should have gotten a signal going down the front yard. It is possible that his neighbor's service comes off of his service from the signal that I obtained after connecting to both lines. Attached are pictures, and a link for the map is below.

Map Link

<http://www.scribblemaps.com/maps/view/7706BeechLnWyndmoorPA19038/7706BeechLnWyndmoorPA19038>

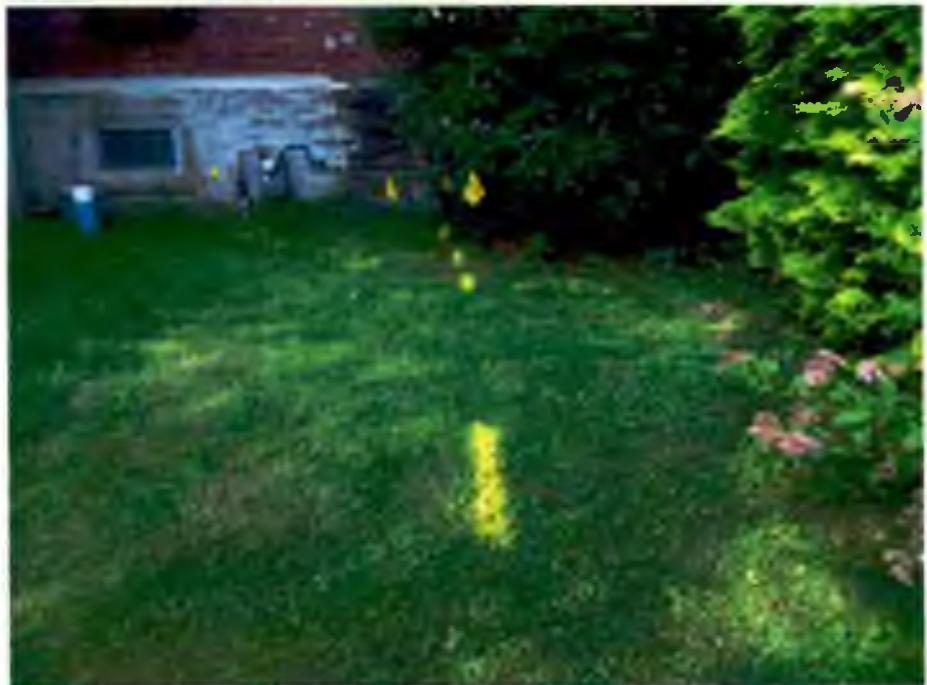
Utility Locate Scan

Picture(s)





Utility Locate Scan



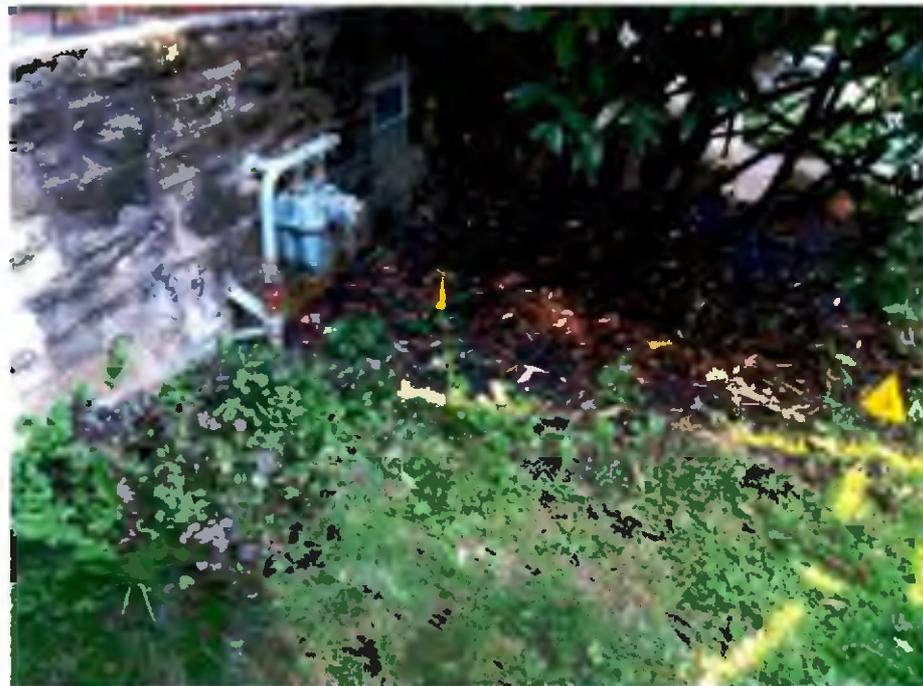


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Date Submitted: 06-13-2025 09:04 AM
Submitted By: ryang@ugdet.com

Utility Locate Scan





Utility Locate Scan



Drawing

Labor Hours Total

1.00

Additional Items

Additional Items Total

TOTAL



Utility Locate Scan

Job Status Completed
Payment Method Bill Customer
Last 4 of CC/Check Number/PO

Disclaimer

With the uncertainty in locating underground utility facilities including those which are plastic, non-conductive, or otherwise unable to be located during scanning and/or limitations of technology including water leak detection, the undersigned ("customer") hereby acknowledges and agrees that The Underground Detective of Greater Cincinnati ("UD") shall have no responsibility for Customer's or Customer's designee's excavation of any underground facility, whether marked or unmarked by UD. Customer further acknowledges and agrees that: (1) he or she hereby assumes, without limitation, all risks of loss and liability relating to or arising out of such excavation by Customer or any third party, including, but not limited to any damage to any underground facility; and (b) there have been no affirmations of fact or promise by UD which relate to services to be provided by UD other than specified in UD's written project proposal delivered in connection with this Disclaimer.

Customer Read? Yes
Customer Name Bill Whelan
Customer Signature

Beech LAKE
1001 PA 19038

Retail



17120

RDC 99

U.S. POSTAGE PAID
FCM LG ENV
FORT WASHINGTON
PA 19034
JUN 27, 2025

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Matthew Homsher, Secretary
PA PUC
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Harrisburg, PA 17120