



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

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

August 18, 2025

Via Electronic Filing

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.
NYCE Construction Services, Inc.
Docket No. C-2025-
I&E Formal Complaint (Damage Prevention)

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,

A handwritten signature in blue ink, appearing to read 'G. Rosul', is written over a light blue horizontal line.

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

GR/ac
Enclosures

cc: Per Certificate of Service
Michael L. Swindler, Deputy Chief Prosecutor (via email – mwindler@pa.gov)
Robert Horensky, Manager, Safety Division (via email – rhorensky@pa.gov)

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**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement	:	
Complainant	:	
	:	
v.	:	Docket No. C-2025-
	:	
NYCE Construction Services, 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 NYCE Construction Services, Inc. (“NYCE” or “Respondent”) alleging violations of the PA One Call Law in connection with a strike on a PPL Electric Utilities Corporation (“PPL”) underground primary electric gathering line while excavating to install a gas mainline in a new development on October 10, 2024, on Fountain View Circle in Upper Macungie Township, Lehigh County. 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
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
grosul@pa.gov
(717) 783-5243

4. Respondent is NYCE Construction Services, Inc., with a main mailing address of 1542 West Broad Street, Quakertown, PA 18951.

5. NYCE meets the definition of an “excavator” pursuant to 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(2.1) of the PA One Call Law, 73 P.S. § 180(2.1), requires excavators to “request to identify the location and type of facility owner lines at each

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.*

work site by notifying the facility owner through the One Call System. Notification shall be not less than three nor more than ten business days in advance of beginning excavation or demolition work.” 73 P.S. § 180(2.1).

8. Section 180(16) of the PA One Call Law, 73 P.S. § 180(16), requires excavators to submit a report of an alleged violation to the Commission through the One Call System not more than thirty days after striking or damaging a facility owner's line during excavation or demolition or if the excavator believes a violation of this act has been committed in association with excavation or demolition work. 73 P.S. § 180(16).

9. 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.

10. 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.

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

12. 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).

13. 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

14. On October 10, 2024, NYCE was excavating by digging a trench with powered equipment to install a gas mainline in a new construction community housing development on Fountain View Circle in Upper Macungie Township, Lehigh County.

15. No locate request was submitted to the Pennsylvania One Call System (“POCS”) by NYCE prior to the excavation work for this specific aspect of the project. A locate request is also referred to as a “Ticket.”

16. NYCE did submit three Tickets to POCS for excavation work taking place in the new subdivision. However, none of them are pertinent to the October 10, 2024, excavation that resulted in a strike on the PPL line, as explained *infra*.

17. On February 2, 2024, NYCE submitted Ticket 20240333036 to POCS to construct a “new housing subdivision,” with a lawful start date of between February 7, 2024, and February 16, 2024, and scheduled to last one year. The worksite was described as “Hidden Meadows Phase 3” on “Werley Road” near Rockrose Lane. I&E Exhibit 1.

18. The accompanying map of the excavation work for “Hidden Meadows Phase 3” encompasses, but is not limited to, the area that would become Fountain View Circle (the road did not exist at the time the Ticket was submitted). Id.

19. On March 20, 2024, NYCE submitted Ticket 2024081491 to POCS. Under “work type,” NYCE provided that the excavation was to “install [a] new water main.” The lawful start date was between March 25, 2024, and April 3, 2024, with a duration of two weeks. I&E Exhibit 2.

20. On September 25, 2024, NYCE submitted Ticket 20242642373 to POCS. Under “work type,” NYCE provided that the excavation was to “install electric service.” The lawful start date was between September 25, 2024, and October 4, 2024, with a duration of two weeks. I&E Exhibit 3.

21. On October 10, 2024, while using powered equipment to excavate a trench to install the gas main, NYCE struck and damaged a PPL electric line. The line was not active at the time of the damage. I&E Exhibit 4.

22. A PPL employee arrived onsite and was unable to make repairs due to the extensive damage to the line.

23. A diligent search by the Bureau of Investigation and Enforcement’s Damage Prevention Section (“DPS”) did not find any Routine Excavation PA One Call Tickets submitted to POCS by NYCE for the location of the excavation and type of work for this excavation between September 30, 2024, and October 7, 2024, which would have been the lawful time frame in which to submit a PA One Call Ticket for an excavation taking place on October 10, 2024.

24. Upon information and belief, NYCE did not submit a PA One Call Ticket to POCS for the work site of the gas main installation.

25. Additionally, after striking the PPL electric line, NYCE did not timely submit an Alleged Violation Report (“AVR”)² to the Commission through POCS, as required by the PA One Call Law.

26. The last day for NYCE to submit a timely AVR to the Commission through POCS was October 25, 2024.

² The purpose of an AVR is to report to the Commission through POCS an alleged violation of the PA One Call Law. 73 P.S. §§ 176 and 180(16).

27. NYCE submitted an untimely AVR on December 19, 2024.

28. On February 18, 2025, a copy of the report prepared by the Damage Prevention Investigator (“DPI”) from DPS was mailed and emailed to NYCE informing Respondent that it was in violation of the PA One Call Law for failing to submit a routine locate request to POCS and for failing to submit an AVR within 10 business days³ of a line strike incident, and further informing Respondent that it could either accept the findings in the DPI’s report or reject them and present its case to the Damage Prevention Committee (“DPC”).

29. On March 4, 2025, Respondent rejected the findings in the DPI’s report via an email to the DPI and requested to present its case before the DPC.

30. On March 21, 2025, a notice of the DPC meeting was sent to NYCE, informing Respondent that it could present its case before the DPC at the April 15, 2025, meeting.

31. NYCE Construction was not present at the April 15, 2025, meeting. Nevertheless, its case was discussed and voted upon by the DPC.

32. On April 16, 2025, a copy of the DPC’s Informal Determination accepting the DPI’s report and proposed penalty was mailed to Respondent, informing NYCE 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.

33. On May 8, 2025, Respondent informed the DPI that it would reject the DPC’s Informal Determination.

III. VIOLATIONS

34. Paragraphs 1-33 are incorporated herein as if stated in their entirety.

³ This provision was amended effective October 29, 2024, by Act 127 of 2024, changing the timeframe to submit an AVR to 30 days. At the time of the line strike in this case, the § 180(16) provided 10 business days.

Count 1

35. Respondent failed to place a valid, routine locate request ticket through POCS prior to digging the trench for the installation of the gas main line on Fountain View Circle.

If proven, this is a violation of Section 180(2.1) of the PA One Call Law, 73 P.S. § 180(2.1). The purpose of an excavator submitting a Ticket to POCS is to “identify the location and type of facility owner lines at each work site.” NYCE’s earlier Ticket covering the entirety of the development, and which was placed 8 months prior to the excavation that gave rise to the line strike, was insufficient to constitute a locate request as it would not allow any facility owner to mark its lines. This is especially true given that the project encompassed a new development, where the underground facilities may not have been installed at the time of the February 2024 Ticket.

As an excavator, Respondent was required to place a routine locate request ticket through POCS between 3 and 10 days before starting excavation or demolition. A diligent search of the Tickets submitted to POCS by the DPS did not return any tickets matching the location and time frame of Respondent’s October 10, 2024, excavation to install the gas main line.

The Bureau of Investigation and Enforcement’s proposed administrative penalty for this violation is \$2,500.

Count 2

36. Respondent failed to file an AVR not more than ten business days after striking PPL’s electric primary line.

If proven, this is a violation of Section 180(16) of the PA One Call Law, 73 P.S. § 180(16). As an excavator, Respondent was required to file an AVR not more than 10 business days after striking a line. However, Respondent waited more than two months after the line strike to alert the Commission of the incident.

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

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

- (1) Find NYCE Construction Services, Inc. to be in violation of the PA One Call Law at 73 P.S. §§ 180(2.1) and 180(16);
- (2) Impose a cumulative administrative penalty upon NYCE Construction Services, Inc. in the amount of \$3,500; and
- (3) Order NYCE Construction Services, 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 set forth, the Bureau of Investigation and Enforcement requests that this matter be referred to the Pennsylvania Office of the Attorney General for 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: August 18, 2025

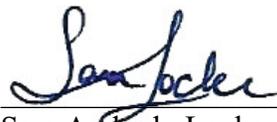
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement	:	
Complainant	:	
	:	
v.	:	Docket No. C-2025-
	:	
NYCE Construction Services, 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: August 18, 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

I&E Exhibit 1

CDC 00000 POCS MM/DD/YY TT:TT:TT 20240333036-000 NEW XCAV RTN

=====
Serial Number-- [20240333036] - [000] Channel#-- [1728AWEB] [0782] [2019-08]
Message Type-- [NEW] [EXCAVATION] [ROUTINE]

County-- [LEHIGH] Municipality-- [UPPER MACUNGIE TWP]
Work Site-- [WERLEY RD]
Nearest Intersection-- [ROCKROSE LN]
Second Intersection-- [ROCKROSE LN]
At Intersection-- [N] Between Intersections-- [N] Site Marked in White-- [N]
Subdivision-- [HIDDEN MEADOWS PHASE 3]

Location Information--
[HIDDEN MEADOWS PHASE 3]
Caller Lat/Lon-- []
Mapped Type-- [P] Mapped Lat/Lon--
[40.590533/-75.572007,40.589608/-75.573707,40.587029/-75.570993,
40.588170/-75.569459]

Attachments-- [http://www.pa811.org/attachments/20240333036]
Type of Work-- [NEW HOUSING SUBDIVISION] Depth-- [15 FT]
Extent of Excavation-- [300 FT X 300 FT] Method of Excavation-- [DIGGING]
Equip Type-- [EXCAVATOR]
Street-- [] Sidewalk-- [] Pub Prop-- [] Pvt Prop-- [X] Other-- []
Private Front-- [X] Rear-- [X] Left-- [X] Right-- [X]

Lawful Start Dates-- [07-Feb-24] thru [16-Feb-24] Response Due Date-- [06-Feb-24]
Scheduled Excavation Date-- [07-Feb-24] Dig Time-- [0700] Duration-- [1 YEAR]

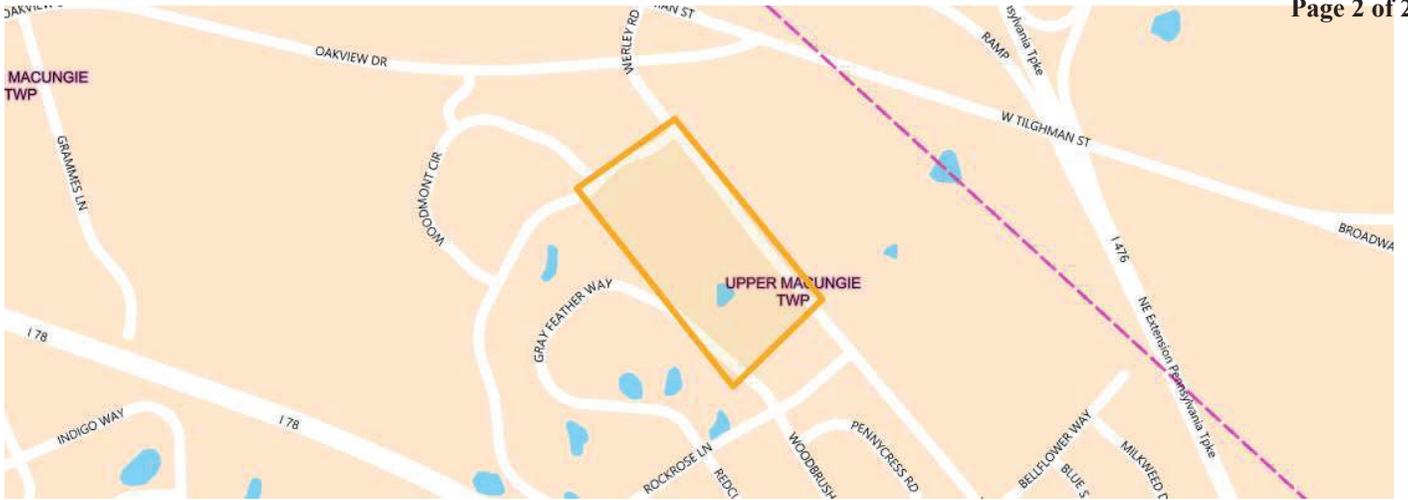
Caller-- [SHAUN FROSHOUR]
Caller Phone-- [215-397-8978]
Excavator-- [NYCE CONSTRUCTION SERVICES INC]
Address-- [1542 W BROAD ST]
City-- [QUAKERTOWN] State-- [PA] Zip-- [18951]
FAX-- [] Caller Type-- [B]
Email-- [SHAUN@NYCECONSTRUCTION.COM]
Work For-- [SAL LAPPIO HOMES]
Onsite Contact-- [SHAUN FROSHOUR]
Onsite Contact Phone-- [215-852-4511]
Best Time to Call-- [ANYTIME]
Onsite Contact Email-- [SHAUN@NYCECONSTRUCTION.COM]
Job Number-- [23HIDMED]

Prepared-- [02-Feb-24] at [1741] by [GATORMEDIC]

Remarks--
[REMARK HIDDEN MEADOWS PHASE 3 FOR WORK RESTART. ENTIRE SITE THAT WAS
PREVIOUSLY DISTURBED.]

DL 0 DL =LEHIGH CO AUTH ME 0 ME =MET ED PI 0 PI =PPL ELEC LEHGH
SES0 SES=SVC ELEC CATV TCC0 TCC=ASTOUND BB UJ 0 UJ =UGI LEHIGH HAZ
UMG0 UMG=U MACUNGIE TWP YI 0 YI =VERIZON EASTERN

Serial Number-- [20240333036] - [000]
=====
Copyright (c) 2024 by Pennsylvania One Call System, Inc. =====



I&E Exhibit 2

CDC 00000 POCS MM/DD/YY TT:TT:TT 20240801491-000 NEW XCAV RTN

=====
Serial Number-- [20240801491]- [000] Channel#-- [1012AWEB] [0270] [2019-08]
Message Type-- [NEW] [EXCAVATION] [ROUTINE]

County-- [LEHIGH] Municipality-- [UPPER MACUNGIE TWP]
Work Site-- [ROCKROSE LANE]
Nearest Intersection-- [WOODMONT CIR]
Second Intersection-- []
At Intersection-- [N] Between Intersections-- [N] Site Marked in White-- [N]
Subdivision-- [HIDDEN MEADOWS PHASE 3]

Location Information--
[INTERSECTION OF ROCKROSE LANE & WOODMONT CIRCLE CLOSEST TO WERLEY ROAD]
Caller Lat/Lon-- []

Mapped Type-- [P] Mapped Lat/Lon--
[40.589642/-75.574063,40.589006/-75.573505,40.589898/-75.571944,
40.590457/-75.572567]

Attachments-- [http://www.pa811.org/attachments/20240801491]
Type of Work-- [INSTALL NEW WATER MAIN] Depth-- [6]
Extent of Excavation-- [4FT X 80FT] Method of Excavation-- [DIGGING]
Equip Type-- [EXCAVATOR]
Street-- [X] Sidewalk-- [X] Pub Prop-- [X] Pvt Prop-- [] Other-- []
Private Front-- [] Rear-- [] Left-- [] Right-- []

Lawful Start Dates-- [25-Mar-24] thru [03-Apr-24] Response Due Date-- [22-Mar-24]
Scheduled Excavation Date-- [25-Mar-24] Dig Time-- [0700] Duration-- [2 WEEKS]

Caller-- [SHAUN FROSHOUR]
Caller Phone-- [215-397-8978]
Excavator-- [NYCE CONSTRUCTION SERVICES INC]
Address-- [1542 W BROAD ST]
City-- [QUAKERTOWN] State-- [PA] Zip-- [18951]
FAX-- [] Caller Type-- [B]
Email-- [SHAUN@NYCECONSTRUCTION.COM]
Work For-- [SAL LAPPIO HOMES]
Onsite Contact-- [SHAUN FROSHOUR]
Onsite Contact Phone-- [215-852-4511]
Best Time to Call-- [ANYTIME]
Onsite Contact Email-- [SHAUN@NYCECONSTRUCTION.COM]

Prepared-- [20-Mar-24] at [1016] by [GATORMEDIC]
Remarks--
[]

DL 0 DL =LEHIGH CO AUTH IA 0 IA =BUCKEYE PT ALTN ME 0 ME =MET ED
PI 0 PI =PPL ELEC LEHGH SES 0 SES=SVC ELEC CATV TCC 0 TCC=ASTOUND BB
UJ 0 UJ =UGI LEHIGH HAZ UMG 0 UMG=U MACUNGIE TWP YI 0 YI =VERIZON EASTERN

Serial Number-- [20240801491]- [000]
=====
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I&E Exhibit 3

CDC 00000 POCS MM/DD/YY TT:TT:TT 20242642373-001 RNOT XCAV INSF

=====
Serial Number-- [20242642373] - [001] Channel#-- [1124A999] [0181] [2019-08]
Message Type-- [RENOTIFY] [EXCAVATION] [INSUFFICIENT]

County-- [LEHIGH] Municipality-- [UPPER MACUNGIE TWP]
Work Site-- [ROCKROSE LN]
Nearest Intersection-- [WOODMONT CIR]
Second Intersection-- []
At Intersection-- [Y] Between Intersections-- [N] Site Marked in White-- [Y]
Subdivision-- [HIDDEN MEADOWS PHASE 3]

Location Information--
[ROCKROSE LANE AT THE ENTRANCE TO NEW DEVELOPMENT CURRENTLY UNDER
CONSTRUCTION]
Caller Lat/Lon-- []

Mapped Type-- [P] Mapped Lat/Lon--
[40.589600/-75.573640,40.589423/-75.573447,40.589710/-75.573061,
40.589839/-75.573302]

Attachments-- [http://www.pa811.org/attachments/20242642373]
Type of Work-- [INSTALL ELECTRIC SERVICE] Depth-- [4]
Extent of Excavation-- [3 FT X 30 FT] Method of Excavation-- [DIGGING]
Equip Type-- [EXCAVATOR]
Street-- [] Sidewalk-- [] Pub Prop-- [] Pvt Prop-- [X] Other-- []
Private Front-- [X] Rear-- [] Left-- [] Right-- []

Lawful Start Dates-- [25-Sep-24] thru [04-Oct-24] Response Due Date-- [25-Sep-24]
Scheduled Excavation Date-- [25-Sep-24] Dig Time-- [0700] Duration-- [2 WEEKS]

Caller-- [SHAUN FROSHOUR]
Caller Phone-- [215-397-8978]
Excavator-- [NYCE CONSTRUCTION SERVICES INC]
Address-- [1542 W BROAD ST]
City-- [QUAKERTOWN] State-- [PA] Zip-- [18951]
FAX-- [] Caller Type-- [B]
Email-- [SHAUN@NYCECONSTRUCTION.COM]
Work For-- [SAL LAPPIO HOMES]
Onsite Contact-- [SHAUN FROSHOUR]
Onsite Contact Phone-- [215-852-4511]
Best Time to Call-- [ANYTIME]
Onsite Contact Email-- [SHAUN@NYCECONSTRUCTION.COM]

Prepared-- [25-Sep-24] at [1127] by [DANIELLE GREEN]
Remarks--
[REMARK ALL UTILITIES IN THE RIGHT OF WAY]

Renotify (RNO) Information
RNO Caller-- [SHAUN FROSHOUR]
RNO Caller Phone-- [215-397-8978]
RNO Onsite Contact-- [SHAUN FROSHOUR]
RNO Onsite Phone-- [215-852-4511]
RNO Onsite Contact Email-- [SHAUN@NYCECONSTRUCTION.COM]
Crew Onsite-- [Y] Unmarked-- [Y] Incorrectly Marked-- [N]

DIRECT CONTACT WITH EXCAVATOR REQUIRED WITHIN TWO HOURS-- [Y]

RNO Remarks--
[ATTN ALL UTILITIES YOU ALL RESPONDED CLEAR NO FACILITIES. CALLER STATES
THERE ARE DEFINITELY UG UTILITIES AT THIS INTERSECTION THAT NEED TO BE
MARKED. PLEASE VERIFY INVOLVEMENT GO TO THE SITE TO MARK LINES AND UPDATE
YOUR RESPONSE ASAP. CREW IS ON SITE NOW DOING OTHER WORK BUT CANNOT START
THIS EXCAVATION UNTIL YOU MARK THOSE LINES. THANK YOU.]

DL 0 DL =LEHIGH CO AUTH ME 0 ME =MET ED PI 0 PI =PPL ELEC LEHG

SES0 SES=SVC ELEC CATV TCC0 TCC=ASTOUND BB UJ 0 UJ =UGI LEHIGH HAZ
UMG0 UMG=U MACUNGIE TWP

Serial Number-- [20242642373] - [001]

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement	:	
Complainant	:	
	:	
v.	:	Docket No. C-2025-
	:	
NYCE Construction Services, 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

NYCE Construction Services, Inc.
Attn: Shaun Froshour
1542 West Broad Street
Quakertown, PA 18951
Shaun@NYCEConstruction.com



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

Dated: August 18, 2025