



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

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

August 28, 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.
Township of Lower Merion
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', 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: Michael L. Swindler, Deputy Chief Prosecutor, I&E-Enforcement (*via email*)
Robert Horensky, Manager, Safety Division (*via email*)
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**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement,	:	
Complainant	:	
	:	
v.	:	Docket No. C-2025-
	:	
Township of Lower Merion,	:	
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 Township of Lower Merion (“Lower Merion” or “Respondent”) alleging violations of the PA One Call Law in connection with a strike on an improperly marked gas distribution line belonging to PECO Energy Company-Gas (“PECO”), during excavation on July 17, 2024 for a project to install a water main in the vicinity of 132 Rock Hill Road, in Lower Merion Township, Montgomery County, Pennsylvania, near Conshohocken State Road and Belmont Avenue. 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 Township of Lower Merion, with a main mailing address of 75 E. Lancaster Avenue, Ardmore, PA 19003.

5. Lower Merion meets the definition of a “facility owner” pursuant to Section 176 of the PA One Call Law, 73 P.S. § 176.¹

¹ “Facility owner” is defined as the public utility or agency, political subdivision, **municipality**, authority, rural electric cooperative or other person or entity who or which owns or operates a line.” 73 P.S. § 176. (emphasis added). A “line” or “facility” is defined as “an underground pipe used in . . . sewage, water or other service to one or more . . . consumers or customers of such service and the appurtenances thereto, regardless of whether such line or structure is located on land owned by a person or public agency or whether it is located within an easement or right-of-way.” 73 P.S. § 176.

6. Section 177 of the PA One Call Law, 73 P.S. § 177, imposes duties on facility owners.

7. Specifically, Section 177(5)(vii) of the PA One Call Law, 73 P.S. § 177(5)(vii), requires facility owners to “respond to emergency notifications as soon as practicable following receipt of notification of such emergency.” 73 P.S. § 177(5)(vii)

8. Respondent, as a facility owner, is subject to the power and authority of this Commission pursuant to Section 182.10 of the PA One Call Law, which requires facility owners to comply with the PA One Call Law. 73 P.S. § 182.10.

9. 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.

10. 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).

11. 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).

12. 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

13. On July 17, 2024, Utility Line Services Inc., (“ULS”) a contractor of Aqua PA, was excavating to install a water mainline at 132 Rock Hill Road, Lower Merion Township, Montgomery County, Pennsylvania. I&E Exhibit 1.

14. ULS was excavating with a valid, routine excavation ticket, Serial Number 20241900439 (“Ticket”). Id.

15. The Ticket was submitted on July 8, 2024, and had a lawful start date for excavation between July 11, 2024, and July 22, 2024. The duration of the excavation work was specified as three months. Id.

16. An updated routine excavation ticket was placed on July 17, 2024, with a lawful start date for excavation between July 22, 2024, and July 31, 2024. The duration of the excavation work was still specified as three months. I&E Exhibit 2.

17. During the process of digging with powered equipment to install the water mainline, ULS struck and damaged an incorrectly marked gas line belonging to PECO near 132 Rock Hill Road, near Conshohocken State Road and Belmont Avenue, in Lower Merion Township, Pennsylvania. I&E Exhibit 3.

18. ULS, the excavator, submitted a Damage Emergency Ticket, Serial Number 20241991373, on July 17, 2024 (“Emergency Ticket”). It was noted on the Emergency Ticket that a four-inch gas main line was struck, that there was an escape of gas, and that 911 had been called. Numerous parties including Lower Merion were served with the emergency ticket. Id.

19. The response due date set forth on the Emergency Ticket was July 17, 2024.

20. Lower Merion failed to respond to the Damage Emergency Ticket until July 29, 2024 — two weeks after the required response due date.

21. On December 19, 2024, 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 Lower Merion informing Respondent that it was in violation of the PA One Call Law by failing to respond to an emergency notification as soon as practicable following notification of the emergency. The letter further informed 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”).

22. On January 2, 2025, Respondent rejected the findings in the DPI’s report via first-class mail and requested to present its case before the DPC.

23. On February 18, 2025, a notice of the DPC meeting was sent to Lower Merion, informing Respondent that it could present its case for discussion at the March 11, 2025, DPC meeting.

24. On March 11, 2025, Respondent presented its case before the DPC, where its case was discussed and voted upon.

25. On March 12, 2025, a copy of the DPC’s Informal Determination accepting the DPI’s report and proposed penalty was mailed to Lower Merion, 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.

26. On April 4, 2025, Respondent informed the DPI via e-mail that it would reject the DPC’s Informal Determination.

III. VIOLATIONS

27. Paragraphs 1-26 are incorporated herein as if stated in their entirety.

Count 1

28. Respondent failed to respond to an emergency notification as soon as practicable following notification.

If proven, this is a violation of Section 177(5)(vii) of the PA One Call Law, 73 P.S. § 177(5)(vii). Generally, the response to a notice through the One Call System shall be made no later than the end of the second business day following receipt of the notification, excluding the business day when the notice was received. More specifically, as a facility owner, Respondent was obligated to respond to the emergency notification “as soon as practicable.” Additionally, the Emergency Ticket specified July 17, 2024, as the date for a response.

Here, not only did Respondent fail to respond to the Emergency Ticket by the required response due date, but Respondent also failed to respond to the Emergency Ticket for two weeks.

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 the Township of Lower Merion to be in violation of the PA One Call Law at 73 P.S. § 177(5)(vii);

- (2) Impose an administrative penalty upon the Township of Lower Merion in the amount of \$1,000, to be paid within 30 days of the entry of a Final Order; and
- (3) Order the Township of Lower Merion to attend an educational program for facility owners through the DPC and provide proof of compliance to the Commission within 90 days of the entry of a Final 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 28, 2025

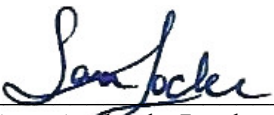
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement,	:	
Complainant	:	
	:	
v.	:	Docket No. C-2025-
	:	
Township of Lower Merion,	:	
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 28, 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 20241900439-000 UPDT XCAV RTN

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

Serial Number--[20241900439]-[000] Channel#--[0736AWEB][0009][2019-08]
Message Type--[UPDATE][EXCAVATION][ROUTINE]

County--[MONTGOMERY] Municipality--[LOWER MERION TWP]

Work Site--[ROCK HILL RD]

Nearest Intersection--[CONSHOHOCKEN STATE RD]

Second Intersection--[BELMONT AVE]

At Intersection--[N] Between Intersections--[N] Site Marked in White--[N]

Subdivision--[]

Location Information--

[WORKING THE ENTIRE LENGTH OF ROCK HILL RD FROM CONSHOHOCKEN STATE RD TO
#134 ROCK HILL RD. PLEASE MARK ALL INTERSECTIONS 50 FT IN ALL DIRECTIONS.]

Caller Lat/Lon--[]

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

[40.018262/-75.240483,40.020867/-75.237597,40.021245/-75.235462,
40.020858/-75.235044,40.020341/-75.237157,40.018106/-75.240150]

Attachments--[http://www.pa811.org/attachments/20241900439]

Type of Work--[INSTALL WATER MAIN AND SERVICES] Depth--[6 FT]

Extent of Excavation--[1230 FT X 2 FT] Method of Excavation--[DIGGING]

Equip Type--[EXCAVATOR]

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

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

Lawful Start Dates--[11-Jul-24] thru [22-Jul-24] Response Due Date--[10-Jul-24]

Scheduled Excavation Date--[11-Jul-24] Dig Time--[0700] Duration--[3 MONTHS]

Caller--[MARK PASCALE]

Caller Phone--[610-239-0900]

Excavator--[UTILITY LINE SERVICES INC]

Address--[1302 CONSHOHOCKEN RD]

City--[CONSHOHOCKEN]

State--[PA] Zip--[19428]

FAX--[610-239-8586]

Caller Type--[B]

Email--[MPASCALE@ULSCORP.COM]

Work For--[AQUA]

Onsite Contact--[MARK PASCALE]

Onsite Contact Phone--[267-530-2913]

Best Time to Call--[0700-1530]

Onsite Contact Email--[MPASCALE@ULSCORP.COM]

Prepared--[08-Jul-24] at [0736] by [ULSMP1]

Remarks--

[*****=== UPDATE 20241780083-000 --7/8/2024 0737 ULS WEB===*****]

UPDATE REQUESTED BY: MARK PASCALE

REASON FOR UPDATE: WORK IN PROGRESS

REMARK LINES.]

AD 0 AD =L MERION T BP 0 BP =COMCAST PLMG HT 0 HT =AQUA PA INC

KE 0 KE =PECO EXELON CO PND0 PND=PENNDOT YI 0 YI =VERIZON EASTERN

Serial Number--[20241900439]-[000]

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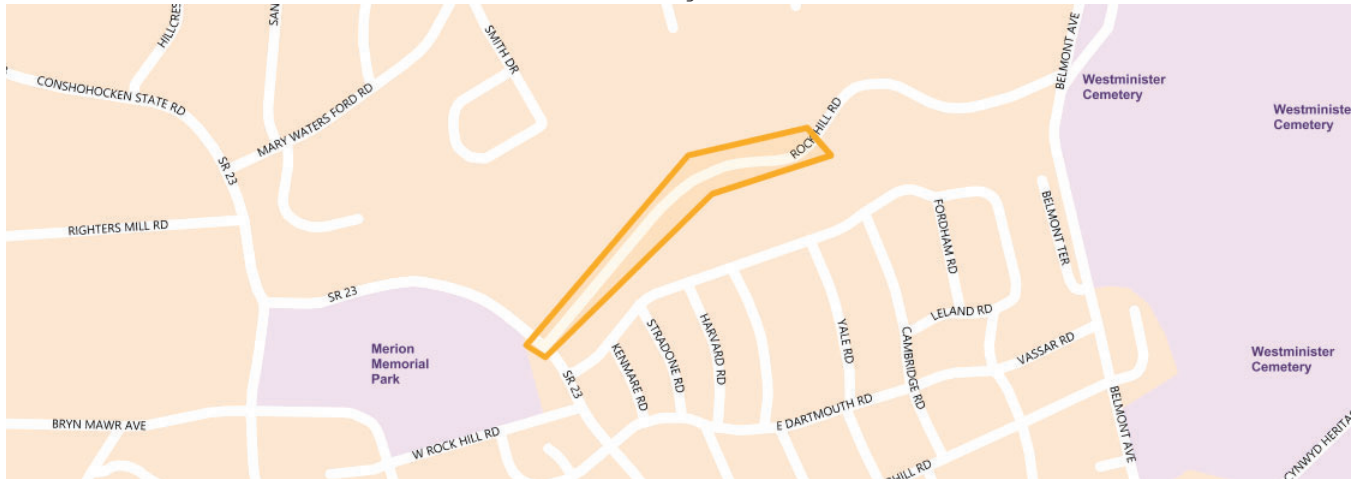
RESPONSES for S/N: 20241900439:

Ver	CDC	Name	Response	Time	Respondent
0	YI	VERIZON PENNSYLVANIA LLC	YI-NO RESPONSE	7/11/2024 12:01:22 AM	Auto-KARL
0	KE	PECO AN EXELON COMPANY	KE-NO RESPONSE	7/11/2024 12:01:22 AM	Auto-KARL
0	KE	PECO AN EXELON COMPANY	KE-FIELD MARKED	7/12/2024 10:00:44 AM	CLS-WEBSVC
0	PND	PENNDOT	PND-CLEAR. NO FACILITIES OR FACIL NOT INVOLVED	7/9/2024 8:04:56 AM	PM-WEB
0	BP	COMCAST CABLE MONTGOMERY COUNTY	BP-CLEAR. NO FACILITIES OR FACIL NOT INVOLVED	7/9/2024 9:15:28 PM	UQ-WEBSVC
0	AD	LOWER MERION TOWNSHIP	AD-FIELD MARKED	7/8/2024 7:59:21 AM	JS-WEB
0	HT	AQUA PENNSYLVANIA INC	HT-FIELD MARKED	7/8/2024 7:40:03 AM	AAA-WEBSVC

DELIVERIES for S/N: 20241900439:

Ver	CDC	Name	To	Time	Seq	Type
0	WEBCFM	WEB CONFIRMATION QUEUE	WEBCFM	7/8/2024 7:37:22 AM	0	MAIL
0	YI	VERIZON PENNSYLVANIA LLC	YI	7/8/2024 7:37:16 AM	164	MAIL
0	KE	PECO AN EXELON COMPANY	KE	7/8/2024 7:37:11 AM	70	MAIL
0	PND	PENNDOT	PND	7/8/2024 7:37:18 AM	1	MAIL
0	BP	COMCAST CABLE MONTGOMERY COUNTY	BP	7/8/2024 7:37:09 AM	39	MAIL
0	AD	LOWER MERION TOWNSHIP	AD	7/8/2024 7:37:16 AM	6	MAIL
0	HT	AQUA PENNSYLVANIA INC	HT	7/8/2024 7:37:17 AM	48	MAIL

ATTACHMENT for S/N: 20241900439 (20241900439-0.gif):



I&E Exhibit 2

CDC 00000 POCS MM/DD/YY TT:TT:TT 20241990967-000 UPDT XCAV RTN

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

Serial Number--[20241990967]-[000] Channel#--[0919AWEB][0006][2019-08]
Message Type--[UPDATE][EXCAVATION][ROUTINE]

County--[MONTGOMERY] Municipality--[LOWER MERION TWP]
Work Site--[ROCK HILL RD]
Nearest Intersection--[CONSHOHOCKEN STATE RD]
Second Intersection--[BELMONT AVE]
At Intersection--[N] Between Intersections--[N] Site Marked in White--[N]
Subdivision--[]
Location Information--
[WORKING THE ENTIRE LENGTH OF ROCK HILL RD FROM CONSHOHOCKEN STATE RD TO
#134 ROCK HILL RD. PLEASE MARK ALL INTERSECTIONS 50 FT IN ALL DIRECTIONS.]
Caller Lat/Lon--[]
Mapped Type--[P] Mapped Lat/Lon--
[40.018262/-75.240483,40.020867/-75.237597,40.021245/-75.235462,
40.020858/-75.235044,40.020341/-75.237157,40.018106/-75.240150]
Attachments--[http://www.pa811.org/attachments/20241990967]
Type of Work--[INSTALL WATER MAIN AND SERVICES] Depth--[6 FT]
Extent of Excavation--[1230 FT X 2 FT] Method of Excavation--[DIGGING]
Equip Type--[EXCAVATOR]
Street--[X] Sidewalk--[X] Pub Prop--[X] Pvt Prop--[X] Other--[]
Private Front--[X] Rear--[] Left--[] Right--[]

Lawful Start Dates--[22-Jul-24] thru [31-Jul-24] Response Due Date--[19-Jul-24]
Scheduled Excavation Date--[22-Jul-24] Dig Time--[0700] Duration--[3 MONTHS]

Caller--[MARK PASCALE]
Caller Phone--[610-239-0900]
Excavator--[UTILITY LINE SERVICES INC]
Address--[1302 CONSHOHOCKEN RD]
City--[CONSHOHOCKEN] State--[PA] Zip--[19428]
FAX--[610-239-8586] Caller Type--[B]
Email--[MPASCALE@ULSCORP.COM]
Work For--[AQUA]
Onsite Contact--[MARK PASCALE]
Onsite Contact Phone--[267-530-2913]
Best Time to Call--[0700-1530]
Onsite Contact Email--[MPASCALE@ULSCORP.COM]

Prepared--[17-Jul-24] at [0919] by [ULSMP1]

Remarks--
[*****== UPDATE 20241900439-000 --7/17/2024 0919 ULS WEB==*****]
UPDATE REQUESTED BY: MARK PASCALE
REASON FOR UPDATE: WORK IN PROGRESS
REMARK LINES.]

AD 0 AD =L MERION T BP 0 BP =COMCAST PLMG HT 0 HT =AQUA PA INC
KE 0 KE =PECO EXELON CO PND0 PND=PENNDOT YI 0 YI =VERIZON EASTERN

Serial Number--[20241990967]-[000]
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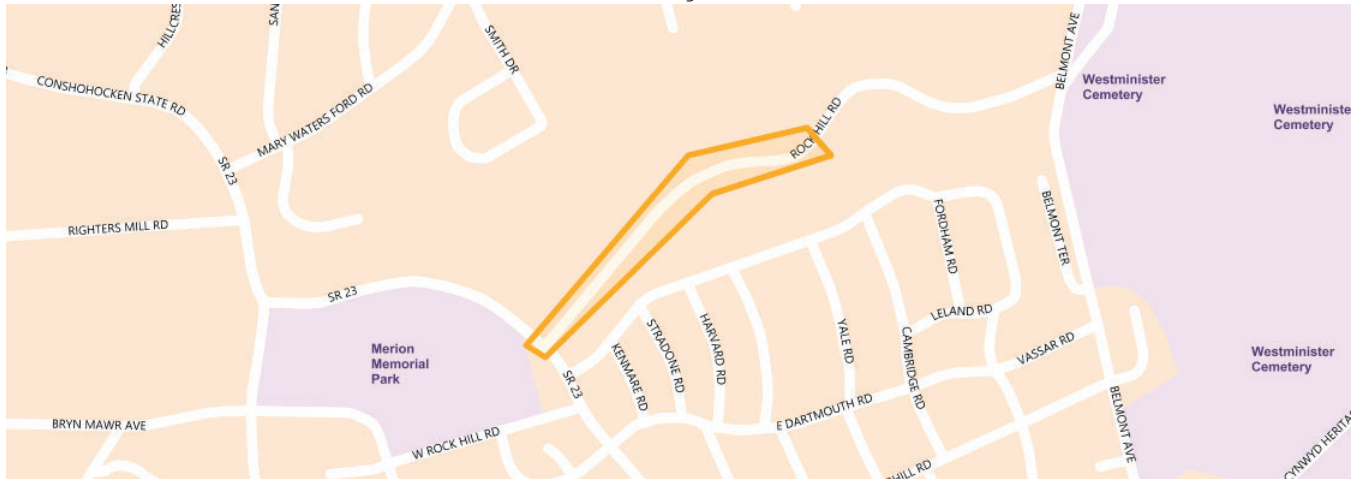
RESPONSES for S/N: 20241990967:

Ver	CDC	Name	Response	Time	Respondent
0	YI	VERIZON PENNSYLVANIA LLC	YI-NO RESPONSE	7/20/2024 12:03:59 AM	Auto-KARL
0	KE	PECO AN EXELON COMPANY	KE-FIELD MARKED	7/19/2024 1:38:19 PM	CLS-WEBSVC
0	PND	PENNDOT	PND-SCHEDULED MARK	7/17/2024 10:33:41 AM	PM-WEB
0	BP	COMCAST CABLE MONTGOMERY COUNTY	BP-CLEAR. NO FACILITIES OR FACIL NOT INVOLVED	7/17/2024 9:15:56 PM	UQ-WEBSVC
0	AD	LOWER MERION TOWNSHIP	AD-FIELD MARKED	7/18/2024 8:36:34 AM	JS-WEB
0	HT	AQUA PENNSYLVANIA INC	HT-FIELD MARKED	7/17/2024 9:37:08 AM	AAA-WEBSVC

DELIVERIES for S/N: 20241990967:

Ver	CDC	Name	To	Time	Seq	Type
0	WEBCFM	WEB CONFIRMATION QUEUE	WEBCFM	7/17/2024 9:20:14 AM	0	MAIL
0	YI	VERIZON PENNSYLVANIA LLC	YI	7/17/2024 9:20:04 AM	268	MAIL
0	KE	PECO AN EXELON COMPANY	KE	7/17/2024 9:20:03 AM	125	MAIL
0	PND	PENNDOT	PND	7/17/2024 9:20:04 AM	1	MAIL
0	BP	COMCAST CABLE MONTGOMERY COUNTY	BP	7/17/2024 9:20:01 AM	71	MAIL
0	AD	LOWER MERION TOWNSHIP	AD	7/17/2024 9:20:03 AM	7	MAIL
0	HT	AQUA PENNSYLVANIA INC	HT	7/17/2024 9:20:02 AM	110	MAIL

ATTACHMENT for S/N: 20241990967 (20241990967-0.gif):



I&E Exhibit 3

CDC 00000 POCS MM/DD/YY TT:TT:TT 20241991373-000 NEW DAMG EMER

=====
Serial Number--[20241991373]-[000] Channel#--[0956A999][0461][2019-08]
Message Type--[NEW][DAMAGE][EMERGENCY]

County--[MONTGOMERY] Municipality--[LOWER MERION TWP]
Work Site--[ROCK HILL RD]
Nearest Intersection--[CONSHOHOCKEN STATE RD]
Second Intersection--[BELMONT AVE]
At Intersection--[N] Between Intersections--[Y] Site Marked in White--[Y]
Subdivision--[]
Location Information--
[LINE WAS HIT RIGHT NEXT TO P AND J AUTO BODY LOCATED APPX HALFWAY BTWN THE
INTERSECTIONS AND BTWN CONSHOCKEN STATE RD AND 134 ROCK HILL RD.]
Caller Lat/Lon--[]
Mapped Type--[P] Mapped Lat/Lon--
[40.018262/-75.240483,40.020867/-75.237597,40.021245/-75.235462,
40.020858/-75.235044,40.020341/-75.237157,40.018106/-75.240150]
Attachments--[http://www.pa811.org/attachments/20241991373]
Type of Work--[DAMAGE-NATURAL GAS] Depth--[2 1/2-3FT]
Extent of Excavation--[1FT] Method of Excavation--[DIGGING]
Equip Type--[BACKHOE]
Street--[X] Sidewalk--[] Pub Prop--[] Pvt Prop--[] Other--[]
Private Front--[] Rear--[] Left--[] Right--[]

Lawful Start Dates--[] thru [] Response Due Date--[17-Jul-24]
Scheduled Excavation Date--[17-Jul-24] Dig Time--[1015]

Caller--[NICK ZIPAY]
Caller Phone--[610-239-0900]
Excavator--[UTILITY LINE SERVICES INC]
Address--[1302 CONSHOHOCKEN RD]
City--[CONSHOHOCKEN] State--[PA] Zip--[19428]
FAX--[] Caller Type--[B]
Email--[nzipay@ulscorp.com]
Work For--[AQUA]
Onsite Contact--[NICK ZIPAY]
Onsite Contact Phone--[484-941-4734]
Best Time to Call--[0700-1530]
Job Number--[WP 24416]

Prepared--[17-Jul-24] at [1004] by [MARY ANNE YURTAL]

Remarks--
[CALLER STATES 4IN GAS MAIN LINE WAS OFF THE MARK SO AREA WAS UNMARKED. 911
IS ON SITE.
FACILITY TYPE: NATURAL GAS-PECO
EXCAVATION EQUIPMENT: BACKHOE
HAZARDOUS RELEASE: YES
CALLER HAS NOTIFIED 911.]

AD 0 AD =L MERION T BP 0 BP =COMCAST PLMG HT 0 HT =AQUA PA INC
KE 0 KE =PECO EXELON CO PND0 PND=PENNDOT YI 0 YI =VERIZON EASTERN

Serial Number--[20241991373]-[000]
=====
Copyright (c) 2024 by Pennsylvania One Call System, Inc. =====

RESPONSES for S/N: 20241991373:

Ver	CDC	Name	Response	Time	Respondent
0	YI	VERIZON PENNSYLVANIA LLC	YI-CLEAR. NO FACILITIES OR FACIL NOT INVOLVED	7/17/2024 12:29:54 PM	AAA-WEBSVC
0	YI	VERIZON PENNSYLVANIA LLC	YI-NO RESPONSE	7/17/2024 12:07:21 PM	Auto-KARL
0	KE	PECO AN EXELON COMPANY	KE-FIELD MARKED	7/17/2024 1:02:17 PM	And-WEBSVC
0	KE	PECO AN EXELON COMPANY	KE-NO RESPONSE	7/17/2024 12:07:21 PM	Auto-KARL
0	PND	PENNDOT	PND-CLEAR. NO FACILITIES OR FACIL NOT INVOLVED	7/17/2024 10:13:50 AM	PM-WEB
0	BP	COMCAST CABLE MONTGOMERY COUNTY	BP-CLEAR. NO FACILITIES OR FACIL NOT INVOLVED	7/17/2024 10:55:19 AM	UQ-WEBSVC
0	AD	LOWER MERION TOWNSHIP	AD-NO RESPONSE	7/17/2024 12:07:21 PM	Auto-KARL
0	AD	LOWER MERION TOWNSHIP	AD-FIELD MARKED	7/29/2024 3:18:33 PM	FP-OTM
0	HT	AQUA PENNSYLVANIA INC	HT-FIELD MARKED	7/17/2024 10:09:24 AM	AAA-WEBSVC

DELIVERIES for S/N: 20241991373:

Ver	CDC	Name	To	Time	Seq	Type
0	YI	VERIZON PENNSYLVANIA LLC	YI	7/17/2024 10:04:18 AM	353	MAIL
0	KE	PECO AN EXELON COMPANY	KE	7/17/2024 10:04:17 AM	160	MAIL
0	PND	PENNDOT	PND	7/17/2024 10:04:18 AM	2	MAIL
0	PND	PENNDOT	PND	7/17/2024 10:14:14 AM	0	SPLV
0	BP	COMCAST CABLE MONTGOMERY COUNTY	BP	7/17/2024 10:04:16 AM	100	MAIL
0	AD	LOWER MERION TOWNSHIP	AD	7/17/2024 10:04:18 AM	15	MAIL
0	HT	AQUA PENNSYLVANIA INC	HT	7/17/2024 10:04:16 AM	132	MAIL

ATTACHMENT for S/N: 20241991373 (20241991373-0.gif):



**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement,	:	
Complainant	:	
	:	
v.	:	Docket No. C-2025-
	:	
Township of Lower Merion,	:	
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

Township of Lower Merion
Attn: Jesse Hunting, Assistant Director of Public Works
75 E. Lancaster Avenue
Ardmore, PA 19003
jhunting@lowermerion.org



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

Dated: August 28, 2025