



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

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

October 7, 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.  
AT&T Enterprises LLC  
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](mailto:grosul@pa.gov)

GR/ac  
Enclosures

cc: Allison C. Kaster, Director, I&E (*via email*)  
Carrie B. Wright, Deputy Chief Prosecutor, I&E (*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](mailto: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-
	:	
AT&T Enterprises LLC,	:	
Respondent	:	

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**FORMAL COMPLAINT**

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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 AT&T Enterprises LLC<sup>1</sup> (“AT&T” or “Respondent”) alleging violations of the PA One Call Law uncovered during the investigation of a strike on an gas line belonging to Columbia Gas of Pennsylvania (“Columbia Gas”), during an excavation on October 22, 2024, for a project involving pole restoration work by Verizon in the vicinity of 142 Rinne Street, City of Pittsburgh, Allegheny County, Pennsylvania. In support of its Complaint, I&E respectfully avers as follows:

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<sup>1</sup> It should be noted that AT&T Corporation was the entity identified as responsible for the PA One Call Violation by the Damage Prevention Committee. However, AT&T Corporation has since merged with AT&T Enterprises LLC. See 54 Pa.B. 1461 and A-2024-3047024.

## 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](mailto:grosul@pa.gov)  
(717) 783-5243

4. Respondent is AT&T Enterprises LLC, utility code 3114958, with a main mailing address of 2550 Interstate Drive, Harrisburg, PA.

5. AT&T meets the definition of a “facility owner” pursuant to Section 176 of the PA One Call Law, 73 P.S. § 176.<sup>2</sup>

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<sup>2</sup> “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).

6. A “line” or “facility” is defined as an “underground conductor or underground pipe or structure used in providing electric or communication service, or an underground pipe used in carrying, gathering, transporting or providing natural or artificial gas, petroleum, propane, oil or petroleum and production product, sewage, water or other service to one or more transportation carriers, 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. The term shall include unexposed storm drainage and traffic loops that are not clearly visible. The term shall include unconventional oil and gas well production and gathering lines or facilities.” 73 P.S. § 176.

7. A “complex project” is “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.

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

9. Specifically, Section 177(5)(viii) of the PA One Call Law, 73 P.S. § 177(5)(viii), requires facility owners to “participate in preconstruction meetings for a complex project or as described by Section [180(3)<sup>3</sup>].” 73 P.S. § 177(5)(viii)

10. 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.

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<sup>3</sup> 73 P.S. § 180(3) describes the excavator’s duty to hold a preconstruction meeting with facility owners for a complex project.

11. 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.

12. 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).

13. 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).

14. 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**

15. On October 22, 2024, an excavator working on behalf of Verizon was using an auger to do repair work on a pole near 142 Rinne Street in the City of Pittsburgh when they struck a 4-inch gas main belonging to Columbia Gas. I&E Exhibit 1.

16. On April 9, 2024, prior to excavating, the excavator had submitted a Complex Project Ticket, serial number 20241003246 ("the Complex Project Ticket") to the Pennsylvania One Call System ("POCS"). I&E Exhibit 2.

17. The Complex Project Ticket specified that the complex project meeting (“the Meeting”) would be held telephonically on April 17, 2024, at 10:30 AM, and provided the phone number that parties required to attend the Meeting were to dial and the teleconference pin number to access the call after dialing. Id.

18. Because Respondent owns or operates underground lines in the vicinity of the excavation near 142 Rinne Street, Pittsburgh, it was obligated to comply with the provision of the PA One Call Law requiring a response to any ticket submitted to POCS for excavation in that area.

19. The Complex Project Ticket informing Respondent of the Meeting was provided to Respondent on April 9, 2024, at 2:14 PM. Id.

20. AT&T failed to respond to the Complex Project Ticket.

21. Because of Respondent’s failure to respond to the Complex Project Ticket, POCS automatically input a “NO RESPONSE” response for AT&T at 12:01 AM on April 17, 2024.

22. The excavator declared the excavation work to be a complex project “as a consequence of its complexity or its potential to cause significant disruption to lines or facilities” in accordance with its duties under the PA One Call Law.

23. During the course of the investigation of this matter by the Bureau of Investigation and Enforcement’s Damage Prevention Section (“DPS”), an AT&T employee communicated to the DPS an email chain wherein another AT&T employee explained that AT&T did not see the ticket because “the ticket failed parsing because [EMPLOYEE NAME] had not coded properly for the Meeting Location. The ticket never made it to WMS<sup>4</sup> for assignment.” I&E Exhibit 3.

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<sup>4</sup> WMS is an acronym for Warehouse Management System, a type of software.

24. No one from AT&T attended the Meeting because they did not receive notice of it because of Respondent's admitted software issue described above in Paragraph 23.

25. 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 AT&T informing Respondent that it was in violation of the PA One Call Law by failing to attend the complex project meeting. 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").

26. On March 6, 2025, Respondent rejected the findings in the DPI's report via first-class mail and requested to present its case before the DPC.

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

28. On April 15, 2025, Respondent presented its case before the DPC, where its case was discussed and voted upon.

29. On April 16, 2025, a copy of the DPC's Informal Determination accepting the DPI's report and proposed penalty was mailed to AT&T, 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.

30. On April 16, 2025, Respondent informed the DPI via e-mail that it would reject the DPC's Informal Determination.

### **III. VIOLATIONS**

31. Paragraphs 1-30 are incorporated herein as if stated in their entirety.

## Count 1

32. Respondent failed to attend a complex project meeting.

If proven, this is a violation of Section 177(5)(viii) of the PA One Call Law, 73 P.S. § 177(5)(viii), which provides that facility owners such as Respondent must “participate in preconstruction meetings for a complex project...”

Here, Respondent failed to respond to the Complex Project Ticket submitted by the excavator, and Respondent’s non-response was logged by POCS. Additionally, Respondent did not call into the meeting. Respondent’s admission in an email to the DPS that it did not see the Complex Project Ticket or attend the Meeting because its software did not correctly “parse” the information received from POCS is not a defense, as it is Respondent’s duty under the PA One Call Law to attend complex project meetings when so called by the excavator or project owner.

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

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

- (1) Find AT&T Enterprises LLC to be in violation of the PA One Call Law at 73 P.S. § 177(5)(viii);
- (2) Impose an administrative penalty upon AT&T Enterprises LLC in the amount of \$2,500, to be paid within 30 days of the entry of a Final Order; and
- (3) Order AT&T Enterprises LLC to attend Online Compliance Training through the Pennsylvania One Call System for facility owners 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](mailto:grosul@pa.gov)

Date: October 7, 2025

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement,	:	
Complainant	:	
	:	
v.	:	Docket No. C-2025-
	:	
AT&T Enterprises LLC,	:	
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: October 7, 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**



# Alleged Violation Report

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

**AVR Number** AVR2024NOV050019

**AVR Version** 1

**First Name** Alicia **Last Name** Bozic

**Company Name** Columbia Gas of PA - Central

**Address** 1600 Colony Rd

**City** York

**State** PA

**Zip Code** 17408

**Email** abreighner@nisource.com **Phone** 717-825-9580

**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 use prudent techniques in the tolerance zone §5(4)

**When did the alleged violation occur? (?)** 10/22/2024  
10:15:00 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.

20242842380

Related Damage Serial Number, if applicable

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Other Related Serial Numbers (?) 20242961682

---

Other Related Serial Numbers (?) 20242501855

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

Reason for Exemption

---

### Event Information

County ALLEGHENY

Municipality PITTSBURGH CITY

Ward 16

Work Site RINNE ST

Nearest Intersection SPRING ST

Second Intersection UNA WAY

Geolocation (?)

---

### Affected Facility Information

---

Primary Right of Way Type Public

Public Right of Way Type City Street

Private Right of Way Type

---

Affected Operation Gas

Facility Subtype Affected Distribution

Facility Owner Company Name Columbia Gas of PA

Contact First Name Randall

Last Name Pappa

Address

City

State

Zip

Email

Phone

Joint Trench?  Yes  No  Unknown

Involve Cross Bore?  Yes  No  Unknown

Measured Depth from Grade 18" - 36" / 46 - 91 cm

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

## Work Information



Start Date of Excavation (?) 10/22/2024  
08:00:00 AM

Excavation Activity POLE

Excavator Company Name Verizon

Contact First Name Last Name

Address 590 Union Ave

City Bellevue

State PA

Zip 15202

Email Phone 412-716-3459

Marked in White  Yes  No  Unknown

Method of Excavation AUGERING

Equipment Used What Equipment was used for excavation or demolition when the event occurred?  
AUGER

Type of Excavator What is the type of excavator for whom the work was being done when the event occurred?  
Utility

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

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  Verizon

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? 6 - < 12 hrs

Exact Value of Service Interruption

Approximately how many customers were affected? 2 - 10

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/marketing 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** Verizon was replacing a pole with an auger when they struck and damaged a 4" plastic gas main in the tolerance zone, ripping a service tee off. They notified 911 and Columbia Gas when the damage occurred. Columbia Gas responded immediately to make the area safe and complete repairs.

Verizon alleged they hit the gas main with a digging bar, but it is evident it was struck with the auger.

If more space is needed, attach additional pages or documents.

<b>Attachments</b>	142 Rinne St., Pittsburgh (1).JPG	6MB
	142 Rinne St., Pittsburgh (2).JPG	6.02MB
	142 Rinne St., Pittsburgh (3).JPG	5.44MB
	142 Rinne St., Pittsburgh (4).JPG	6.68MB
	142 Rinne St., Pittsburgh (5).JPG	4.71MB
	142 Rinne St., Pittsburgh_Locate.jpg	4.7MB

Attach pictures and additional documents

**Submit Date** 11/05/2024

## Compliance Update

**Research Result**  Listed tickets found  
 Additional tickets found  
 No tickets found

## Additional Tickets Found

**Additional Serial Numbers** 20241003246

**Ticket Attachment** 6739334\_report.pdf 2.31MB

**Comments**

# **I&E Exhibit 2**

CDC 00000 POCS MM/DD/YY TT:TT:TT 20241003246-000 NEW XCAV CMPX

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

Serial Number--[20241003246]-[000] Channel#--[1412AWEB][0114][2019-08]

Message Type--[NEW][EXCAVATION][COMPLEX PROJECT][L]  
Preconstruction Meeting Requested--[Y]

Proposed Meeting Date and Time--[17-Apr-24][1030] Response Due Date--[16-Apr-24]  
Lawful Start Date--[23-Apr-24] Duration--[1 DAY]

Meeting Location--  
[ELECTRONIC - YES. (SEE REMARKS).]

Caller--[JAJUANNA OHARA]  
Caller Phone--[770-632-6775]  
Excavator--[OSMOSE UTILITIES SERVICES INC]  
Address--[635 HIGHWAY 74 S]  
City--[PEACHTREE CITY] State--[GA] Zip--[30269]  
FAX--[ ] Caller Type--[B]  
Email--[JOHARA@OSMOSE.COM]

Onsite Contact--[JAJUANNA OHARA]  
Onsite Contact Phone--[770-632-6775]  
Best Time to Call--[0800-0400]  
Onsite Contact Email--[JOHARA@OSMOSE.COM]

Scope of Work

County--[ALLEGHENY]  
Municipality--[PITTSBURGH CITY] Ward--[16]  
Site Street--[PA\_VZ\_PITTSBURGH\_VZ\_PERMIT\_CP (PH 10)]  
between--[PA\_VZ\_PITTSBURGH\_VZ\_PERMIT\_CP (PH 10)]  
and--[PA\_VZ\_PITTSBURGH\_VZ\_PERMIT\_CP (PH 10)]  
Site Marked in White--[Y] Subdivision--[ ]

Location Information--

[THIS IS A PHONE TELECONFERENCE! POLES ARE LOCATED AT VARIOUS LOCATIONS. WE ARE DOING POLE RESTORATION. WE ARE DRIVING A PIECE OF STEEL APPROX 5 FT DEEP AND BANDING IT TO THE POLE. THIS IS FOR A TELECONFERENCE ONLY. PLEASE RESPOND TO THIS TICKET IF YOU WILL OR WILL NOT ATTEND. WE WILL DISCUSS FURTHER DETAILS OF THE WORK ON THE MEETING. \*\*AFTER THE MEETING PLEASE REMEMBER TO RESPOND THAT YOU ATTENDED THE MEETING IN COORD PA. THANK YOU.\*\* TELECONFERENCE TIME: 04/17/2024 @ 10:30 A.M. PHONE # 470-440-4936 PHONE CONFERENCE ID/ PHONE MEETING PIN: 993 549 290#]

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

Attachments--[<http://www.pa811.org/attachments/20241003246>]

Type of Work--[REINFORCING UTILITY POLE WITH STEEL] Depth--[5FT]

Extent of Excavation--[ ] Method of Excavation--[ ]

Equip Type--[ ]

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

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

Owner--[VERIZON]  
CPA Project ID--[6739334]

Prepared--[09-Apr-24] at [1414] by [JAJUANNA]

Remarks--

[PHONE MEETING NUMBER: 470-440-4936. THIS IS A PHONE TELECONFERENCE! POLES ARE LOCATED AT VARIOUS LOCATIONS. WE ARE DOING POLE RESTORATION. WE ARE DRIVING A PIECE OF STEEL APPROX 5 FT DEEP AND BANDING IT TO THE POLE. THIS IS FOR A TELECONFERENCE ONLY. PLEASE RESPOND TO THIS TICKET IF YOU WILL OR WILL NOT ATTEND. WE WILL DISCUSS FURTHER DETAILS OF THE WORK ON THE MEETING. \*\*AFTER THE MEETING PLEASE REMEMBER TO RESPOND THAT YOU ATTENDED THE MEETING IN COORD PA. THANK YOU.\*\* TELECONFERENCE TIME: 04/17/2024 @ 10:30 A.M. PHONE # 470-440-4936 PHONE CONFERENCE ID/ PHONE MEETING PIN: 993 549 290#. POLES MARKED WITH OUS IN WHITE PAINT // REFERENCE COMPLEX PROJECT SERIAL NUMBER. ELECTRONIC SOFTWARE: MICROSOFT TEAMS. SEE PROJECT IN COORDINATE PA FOR THE MEETING LINK AND DETAILS.

\*\*\*\*\*  
\*\*\*\*\*ADDITIONAL MEETING INFORMATION\*\*\*\*\*

ALL FACILITY OWNERS ARE REQUIRED TO ATTEND THIS MEETING UNLESS A CLEAR  
RESPONSE CAN BE DETERMINED FROM THE SCOPE OF WORK.]

ACPO	ACP=ALLEGH CTY PWD	AL 0	AL =PEOPLES GAS	AS 0	AS =ALCOSAN
ASLO	ASL=CROWN CASTLE	ATM0	ATM=AT&T	BD 0	BD =VERIZON PA
CB 0	CB =PGH WTR & SWR	CE 0	CE =COL GAS B PARK	CP 0	CP =PGH MOB & INFRA
CPE0	CPE=PGH MOB & INFRA	CSA0	CSA=COL GAS	DC 0	DC =DUQ LIGHT PGH
DQE0	DQE=DQE COMMUNICATN	EXN0	EXN=EXTENET SYS LLC	LKC0	LKC=LUMEN LVL 3
MI 0	MI =MCI	PGH0	PGH=COMCAST CABLE	WE 0	WE =PAW BETHELPARK

Serial Number--[20241003246]-[000]

=====  
===== Copyright (c) 2024 by Pennsylvania One Call System, Inc. =====

RESPONSES for S/N: 20241003246:

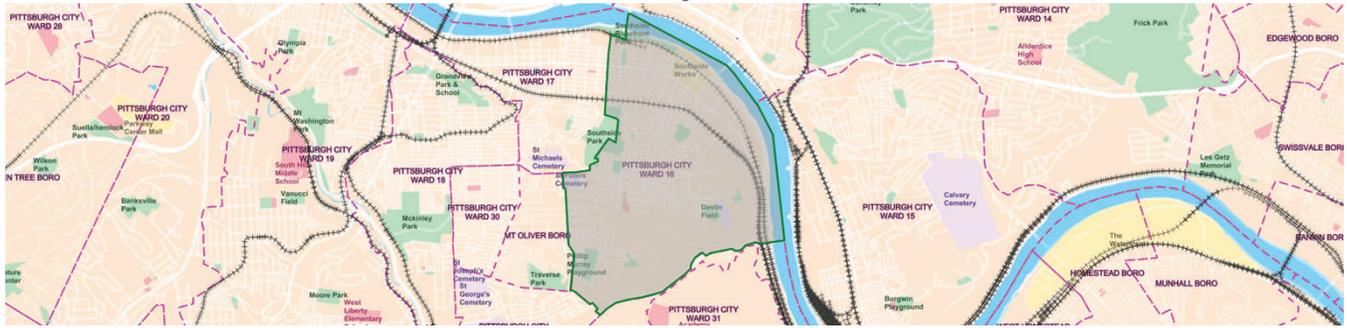
Ver	CDC	Name	Response	Time	Respondent
0	WE	PENNSYLVANIA AMERICAN WATER	WE-WILL ATTEND MEETING	4/10/2024 8:36:08 AM	CAP-WEBSVC
0	WE	PENNSYLVANIA AMERICAN WATER	WE-ATTENDED MEETING. REACHED AGREEMENT	4/17/2024 10:50:52 AM	CAP-WEBSVC
0	PGH	COMCAST CABLE COMMUNICATIONS INC	PGH-CLEAR. NO FACILITIES OR FACIL NOT INVOLVED	4/16/2024 1:42:49 PM	CLS-WEBSVC
0	MI	VERIZON BUSINESS FORMERLY MCI	MI-CLEAR. NO FACILITIES OR FACIL NOT INVOLVED	4/15/2024 3:14:14 PM	AAA-WEBSVC
0	LKC	LUMEN FORMERLY LEVEL 3	LKC-CLEAR. NO FACILITIES OR FACIL NOT INVOLVED	4/15/2024 3:14:35 PM	AAA-WEBSVC
0	EXN	EXTENET SYSTEMS LLC	EXN-CLEAR. NO FACILITIES OR FACIL NOT INVOLVED	4/16/2024 1:42:49 PM	CLS-WEBSVC
0	DQE	DQE COMMUNICATIONS LLC	DQE-CLEAR. NO FACILITIES OR FACIL NOT INVOLVED	4/9/2024 3:55:35 PM	AN-WEB
0	DC	DUQUESNE LIGHT COMPANY	DC-CLEAR. NO FACILITIES OR FACIL NOT INVOLVED	4/9/2024 2:26:40 PM	AAA-WEBSVC
0	CSA	COLUMBIA GAS OF PA INC	CSA-WILL ATTEND MEETING	4/9/2024 2:46:21 PM	AAA-WEBSVC
0	CPE	PITTSBURGH CITY DEPT OF MOBILITY & INFRASTRUCTURE	CPE-CLEAR. NO FACILITIES OR FACIL NOT INVOLVED	4/9/2024 2:20:31 PM	DS-WEB
0	CE	COLUMBIA GAS OF PA INC BETHEL PARK	CE-WILL ATTEND MEETING	4/15/2024 11:36:41 AM	AAA-WEBSVC
0	CP	PITTSBURGH CITY DEPT OF MOBILITY & INFRASTRUCTURE	CP-FIELD MARKED	4/9/2024 2:38:05 PM	GW-WEB
0	BD	VERIZON PENNSYLVANIA LLC	BD-FIELD MARKED	4/17/2024 10:33:56 AM	AAA-WEBSVC
0	BD	VERIZON PENNSYLVANIA LLC	BD-NO RESPONSE	4/17/2024 12:01:30 AM	Auto-KARL
0	ATM	AT&T	ATM-NO RESPONSE	4/17/2024 12:01:30 AM	Auto-KARL
0	ASL	CROWN CASTLE	ASL-CLEAR. NO FACILITIES OR FACIL NOT INVOLVED	4/15/2024 3:16:00 PM	AAA-WEBSVC
0	AS	ALLEGHENY COUNTY SANITARY AUTHORITY	AS-ATTENDED MEETING. REACHED AGREEMENT	4/17/2024 11:24:40 AM	AAA-WEBSVC
0	AS	ALLEGHENY COUNTY SANITARY AUTHORITY	AS-WILL ATTEND MEETING	4/9/2024 4:04:28 PM	AAA-WEBSVC
0	AL	PEOPLES GAS COMPANY LLC	AL-ATTENDED MEETING. REACHED AGREEMENT	4/17/2024 12:01:35 PM	AAA-WEBSVC
0	AL	PEOPLES GAS COMPANY LLC	AL-WILL ATTEND MEETING	4/16/2024 10:45:39 AM	AAA-WEBSVC
0	ACP	ALLEGHENY COUNTY DEPT OF PUBLIC WORKS	ACP-WILL ATTEND MEETING	4/11/2024 12:43:16 PM	MS-OTM
0	CB	PITTSBURGH WATER & SEWER AUTHORITY THE	CB-NO RESPONSE	4/17/2024 12:01:30 AM	Auto-KARL
0	CB	PITTSBURGH WATER & SEWER AUTHORITY THE	CB-DID NOT ATTEND MEETING. DCTF BY FO	4/18/2024 7:13:44 AM	JDA-WEBSVC

DELIVERIES for S/N: 20241003246:

Ver	CDC	Name	To	Time	Seq	Type
0	WEBCFM	WEB CONFIRMATION QUEUE	WEBCFM	4/9/2024 2:15:05 PM	0	MAIL
0	WE	PENNSYLVANIA AMERICAN WATER	WE	4/9/2024 2:14:57 PM	86	MAIL
0	PGH	COMCAST CABLE COMMUNICATIONS INC	PGH	4/9/2024 2:15:00 PM	50	MAIL
0	MI	VERIZON BUSINESS FORMERLY MCI	MI	4/9/2024 2:14:57 PM	196	MAIL
0	LKC	LUMEN FORMERLY LEVEL 3	LKC	4/9/2024 2:14:59 PM	173	MAIL
0	EXN	EXTENET SYSTEMS LLC	EXN	4/9/2024 2:14:56 PM	2	MAIL
0	DQE	DQE COMMUNICATIONS LLC	DQE	4/9/2024 2:14:59 PM	25	MAIL
0	DC	DUQUESNE LIGHT COMPANY	DC	4/9/2024 2:14:59 PM	314	MAIL
0	CSA	COLUMBIA GAS OF PA INC	CSA	4/9/2024 2:14:58 PM	43	MAIL
0	CPE	PITTSBURGH CITY DEPT OF MOBILITY & INFRASTRUCTURE	CPE	4/9/2024 2:14:58 PM	70	MAIL
0	CE	COLUMBIA GAS OF PA INC BETHEL PARK	CE	4/9/2024 2:14:58 PM	104	MAIL
0	CP	PITTSBURGH CITY DEPT OF MOBILITY & INFRASTRUCTURE	CP	4/9/2024 2:14:59 PM	39	MAIL
0	BD	VERIZON PENNSYLVANIA LLC	BD	4/9/2024 2:14:56 PM	396	MAIL
0	ATM	AT&T	ATM	4/9/2024 2:14:58 PM	142	MAIL
0	ASL	CROWN CASTLE	ASL	4/9/2024 2:14:58 PM	107	MAIL
0	AS	ALLEGHENY COUNTY SANITARY AUTHORITY	AS	4/9/2024 2:14:57 PM	22	MAIL
0	AL	PEOPLES GAS COMPANY LLC	AL	4/9/2024 2:14:57 PM	492	MAIL
0	ACP	ALLEGHENY COUNTY DEPT OF PUBLIC WORKS	ACP	4/9/2024 2:15:00 PM	53	MAIL
0	CB	PITTSBURGH WATER & SEWER AUTHORITY THE	CB	4/9/2024 2:14:57 PM	73	MAIL



ATTACHMENT for S/N: 20241003246 (20241003246-0.gif):



# **I&E Exhibit 3**

Locke, Sara

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**From:** [REDACTED] <[REDACTED]@[REDACTED]>  
**Sent:** Wednesday, April 16, 2025 4:18 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** [External] 051017-009140 Notification from Damage Prevention Committee

*ATTENTION: This email message is from an external sender. Do not open links or attachments from unknown senders. To report suspicious email, use the [Report Phishing button in Outlook](#).*

This is a formal dispute of case 051017-009140.

This is a know software issue we had and resolved. I did verify this in fact was part of that issue.

As previously discussed with the PUC we have corrected the issue. We are just seeing fines from line strike audits. We are kindly asking that the fine be removed.

Thanks,

[REDACTED]  
Manager – Business Field Services  
AT&T Business – Customer Service and Operations

AT&T Corporation  
635 Grant St. Pittsburgh PA 15219

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**From:** [REDACTED] <[REDACTED]@[REDACTED]>  
**Sent:** Wednesday, April 16, 2025 4:05 PM  
**To:** [REDACTED] <[REDACTED]@[REDACTED]>  
**Cc:** [REDACTED] <[REDACTED]@[REDACTED]> [REDACTED] <[REDACTED]@[REDACTED]>  
**Subject:** RE: 051017-009140 Notification from Damage Prevention Committee

[REDACTED]

This the exact issue that we disputed to the DPC on Tuesday. The ticket failed parsing because Arun had not coded properly for the Meeting Location. The ticket never made it to WMS for assignment.



I do not see a WMS ticket associated with this one. Looks to be the coding issue. Let me know what you find out and I will dispute it.

One call 20241003246

Thanks,

[REDACTED]  
[REDACTED]  
Manager – Business Field Services  
AT&T Business – Customer Service and Operations

**AT&T Corporation**

635 Grant St. Pittsburgh PA 15219

[REDACTED] [REDACTED]

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**From:** [REDACTED]

**Sent:** Wednesday, April 16, 2025 1:53 PM

**To:** [REDACTED] [REDACTED] [REDACTED]

**Subject:** Notification from Damage Prevention Committee

Please see the attached letter from the Damage Prevention Committee Chairman. A hard copy will be sent via regular mail.

Thank you,  
Damage Prevention Section  
Pennsylvania Public Utility Commission

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement,	:	
Complainant	:	
	:	
v.	:	Docket No. C-2025-
	:	
AT&T Enterprises LLC,	:	
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**

AT&T  
Attn: Legal Department  
500 South 27th Street, 2nd Fl.  
Philadelphia, PA 19146

AT&T Enterprises LLC  
Attn: Michael Frazer  
635 Grant Street  
Pittsburgh, PA 15219



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

Dated: October 7, 2025