



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

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

January 8, 2026

**Via Electronic Filing**

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

Re: Pennsylvania Public Utility Commission,  
Bureau of Investigation and Enforcement v.  
Interstate Paving Company, LLC  
Docket No. C-2026-  
**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 black ink that reads 'Samantha N. Barbush'.

Samantha N. Barbush  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 331654  
(717) 772-8582  
[sbarbush@pa.gov](mailto:sbarbush@pa.gov)

SNB/ac  
Enclosures

cc: Allison C. Kaster, Chief Prosecutor, I&E (via email – [akaster@pa.gov](mailto:akaster@pa.gov))  
Sara Andrade-Locke, Damage Prevention Supervisor, I&E (via email – [salocke@pa.gov](mailto:salocke@pa.gov))  
Per Certificate of Service

## NOTICE

A. **You must file an Answer within 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. You may file your Answer by mailing an original to:

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

Or, you may eFile your Answer using the Commission's website at [www.puc.pa.gov](http://www.puc.pa.gov). The link to eFiling is located under the Filing & Resources tab on the homepage. If your Answer is 250 pages or less, you are not required to file a paper copy. If your Answer exceeds 250 pages, you must file a paper copy with the Secretary's Bureau.

**In addition to filing your Answer with the Commission's Secretary, please electronically serve a copy on:**

Samantha N. Barbush, Prosecutor  
Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
400 North Street, 3<sup>rd</sup> Floor West  
Harrisburg, PA 17210  
[sbarbush@pa.gov](mailto:sbarbush@pa.gov)

B. If you fail to answer this Complaint within 20 days, the Bureau of Investigation and Enforcement will request that the Commission issue an Order imposing the requested relief.

C. You may elect not to contest this Complaint by paying the civil penalty and performing the requested relief within 20 days. Send only a certified check or money order made payable to the "Commonwealth of Pennsylvania," with the docket number indicated, and mail to:

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

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 requested relief set forth in the Complaint.

E. If you file an Answer which contests the Complaint, the matter will be assigned to an 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	:	
	:	
v.	:	Docket No. C-2026-
	:	
Interstate Paving Company, LLC	:	

---

**FORMAL COMPLAINT**

---

NOW COMES the Bureau of Investigation and Enforcement (“I&E”) of the Pennsylvania Public Utility Commission (“Commission”), by its prosecuting attorneys, and files this **Damage Prevention-Related Complaint** (“Complaint”) against Interstate Paving Company, LLC (“Respondent”), pursuant to Sections 182.8(c)-(d) and 182.10 of the Underground Utility Line Protection Law, Act of October 29, 2024, P.L.852, No.287 (hereinafter referred to as the “PA One Call Law”), 73 P.S. §§ 182.8(c)-(d), 182.10.<sup>1</sup> In support of its Complaint, I&E respectfully represents the following:

**I. COMMISSION JURISDICTION AND AUTHORITY**

1. The Pennsylvania Public Utility Commission, with a mailing address of 400 North Street, Harrisburg, PA 17120, is a duly constituted agency of the Commonwealth of Pennsylvania empowered to, *inter alia*, enforce compliance by

---

<sup>1</sup> The purpose of the PA One Call Law is to protect the public health and safety by preventing excavation or demolition work from damaging underground lines used in providing electricity, communication, gas, propane, oil delivery, oil product delivery, sewage, water, or other service; imposing duties upon the providers of such service and persons and other entities preparing drawings or performing excavation or demolition work; and prescribing penalties.

excavators, facility owners, and other stakeholders pursuant to Section 182.10 of the PA One Call Law, 73 P.S. § 182.10.

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), including actions to enforce compliance of the PA One Call Law.

3. Complainant is represented by:

Samantha N. Barbush  
Prosecutor  
Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street, 3W  
Harrisburg, PA 17120  
[sbarbush@pa.gov](mailto:sbarbush@pa.gov)  
(717) 772-8582

4. Respondent is Interstate Paving Company, LLC, with a main mailing address of 1661 Hanover Pike, Littlestown, Pennsylvania 17340.

5. Respondent is an “excavator” as that term is defined at 73 P.S. § 176 as it “performs excavation or demolition work for [itself] or for another person.”

6. “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, dredging,

drilling, driving-in, grading, plowing-in, pulling-in, ripping, scraping, trenching and tunneling.” 73 P.S. § 176.

7. “Demolition work” is defined as “the partial or complete destruction of a structure, by any means, served by or adjacent to a line or lines.” 73 P.S. § 176.

8. “Powered equipment” is defined as “any equipment energized by an engine or motor and used in excavation or demolition work.” 73 P.S. § 176.

9. “Line” or “facility” is defined as “an underground conductor or 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...customers...” 73 P.S. § 176.

10. “Work site” is defined as “the specific place denoted on the locate request where excavation or demolition work is being or is planned to be performed. A work site should be denoted as a clearly defined, bounded area, including relevant identifiable points of reference such as the specific address with a specific description as to the portion of the property, including descriptions such as front, back, left side, right side and direction such as N, S, E, W or variants. Where possible, the points should also reference, without limitation, the size and radius or circumference of the excavation, utility pad or pedestal numbers, utility pole numbers, landmarks, including trees, fountains, fences, railroads, highway and pipeline markers, and latitude and longitude.” 73 P.S. § 176.

11. “Locate request” is defined as “communication or notification between an excavator...and the [Pennsylvania] One Call System in which a request for locating facilities is processed.” 73 P.S. § 176.

12. Respondent, as an excavator, is subject to the power and 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.

13. Sections 182.8(c)-(d) and 182.10 of the PA One Call Law, 73 P.S. §§ 182.8(c)-(d), 182.10, authorize the Commission to, *inter alia*, hear and determine complaints against excavators for violations of the PA One Call Law and enforce the provisions of the PA One Call Law.

14. Section 182.10(a) of the PA One Call Law, 73 P.S. § 182.10(a), authorizes the Commission to impose administrative penalties on excavators who violate the PA One Call Law. Section 182.10(b)(1)(i)-(ii) allows for the imposition of an administrative penalty not to exceed \$2,500 for each violation or, if the violation results in injury, death, or property damage of \$25,000 or more, an administrative penalty not to exceed \$50,000. 73 P.S. § 182.10(b)(1)(i)-(ii).

15. Pursuant to the provisions of the applicable Commonwealth statutes, the Commission has jurisdiction over the subject matter of this Complaint and the actions of Respondent related thereto.

## **II. FACTUAL BACKGROUND**

16. At all material times hereto, Respondent was an “excavator” as defined in Section 176 of the PA One Call Law, 73 P.S. § 176.

17. On April 28, 2025, at approximately 9:50 AM, Respondent was performing excavation work, as it was in various stages of asphalt paving a residential driveway at or

near 936 Baltimore Road, Shippensburg, Southampton Township, Pennsylvania (hereinafter referred to as “excavation site”).

18. A UGI Utilities, Inc. (“UGI”) employee observed “[Respondent] grading [the] driveway and using a jackhammer without the presence of [utility line markers, whereupon the] UGI employee stopped the work and asked the excavator to place a ticket [or locate request] with [the Pennsylvania One Call System (“POCS”)].” *See* I&E Exhibit 1 at 6.

19. Respondent did not place a locate request with the POCS.

20. UGI submitted a Pennsylvania Underground Utility Line Protection Emergency Locate Request (“Emergency Locate Request”) to the POCS. *See* I&E Exhibit 2.

21. UGI is the facility owner, as defined in 73 P.S. § 176, of the underground gas line.

22. After the Emergency Locate Request was created, Respondent resumed and completed the residential driveway project with no damage to any line or facility at the excavation site.

23. On April 30, 2025, in response to the April 28, 2025 incident, UGI submitted an Alleged Violation Report (“AVR”) with the POCS, pursuant to 73 P.S. § 177(10). *See* I&E Exhibit 1.

24. The purpose of an AVR is to report to the Commission, through the POCS, an alleged violation of the PA One Call Law that occurred in association with excavation or demolition work. *See* 73 P.S. §§ 176 and 177(10).

25. In its AVR, UGI alleged that Respondent failed to submit a routine locate request through the POCS prior to commencing excavation work. *See* I&E Exhibit 1.

26. In addition to its AVR, UGI submitted photographs of the excavation site with the POCS. UGI's photographs are attached as I&E Exhibit 1A-C.

27. The photograph at I&E Exhibit 1A depicts a jackhammer vertically lodged in the driveway's asphalt and another portion of the driveway disturbed at the excavation site. *See* I&E Exhibit 1A.

28. The photograph at I&E Exhibit 1B depicts powered equipment on the driveway in the background and a UGI gas pipeline warning alongside UGI utility line markers in the foreground at or near the excavation site. *See* I&E Exhibit 1B.

29. The photograph at I&E Exhibit 1C depicts Respondent's vehicle parked at or near the excavation site. *See* I&E Exhibit 1C.

30. The photographs fairly and accurately show the excavation site as they appeared on or about April 28, 2025.

31. Respondent did not submit a routine locate request through the POCS prior to the commencement of excavation or demolition work nor an emergency locate request through the POCS after the commencement of excavation or demolition work.

32. Respondent did not call the POCS to provide the work site or other required information nor received a POCS serial number.

### **III. VIOLATIONS**

33. Paragraphs 1-32 above are incorporated herein as if stated in their entirety.

34. Respondent failed to submit a routine locate request through the POCS at least three (3) business days prior to commencing excavation, in that Respondent never submitted a routine locate request for the above-referenced excavation site.

If proven, this is a violation of Section 180(2.1) of the PA One Call Law, 73 P.S. § 180(2.1), requiring an excavator to notify facility owners through the POCS at least three (3) business days prior to commencing excavation.

Pursuant to the factors set forth in Section 182.10(b)(2)(i)-(vi) of the PA One Call Law, 73 P.S. § 182.10(b)(2)(i)-(vi), the Bureau of Investigation and Enforcement's proposed administrative penalty for this violation is One Thousand Dollars (\$1,000).

35. Respondent failed to provide exact information to identify the work site so that facility owners might provide indications of their lines, in that Respondent never called the POCS to provide the work site and other required information nor received a serial number.

If proven, this is a violation of Section 180(2.2) of the PA One Call Law, 73 P.S. § 180(2.2), requiring excavators to provide the POCS with exact information to identify the work site.

Pursuant to the factors set forth in Section 182.10(b)(2)(i)-(vi) of the PA One Call Law, 73 P.S. § 182.10(b)(2)(i)-(vi), the Bureau of Investigation and Enforcement's proposed administrative penalty for this violation is Five Hundred Dollars (\$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 Respondent to be in violation of the PA One Call Law at Sections 180(2.1) and (2.2), 73 P.S. §§ 180(2.1), (2.2);
- 2) Impose an administrative penalty upon Respondent in the amount of Fifteen Hundred Dollars (\$1500);
- 3) Order Respondent 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 entry of a Final Order;
- 4) Order such other remedies as the Commission may deem appropriate; and
- 5) If payment of the administrative penalty is not made as directed, the Bureau of Investigation and Enforcement requests that this matter be referred to the Pennsylvania Office of the Attorney General for collection and any other appropriate action.

Respectfully submitted,



Samantha N. Barbush  
Prosecutor  
PA Attorney ID No. 331654

Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street, 3W  
Harrisburg, PA 17120  
(717) 772-8582  
[sbarbush@pa.gov](mailto:sbarbush@pa.gov)

Date: January 8, 2026

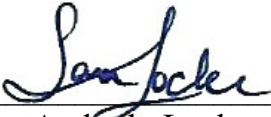
**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement	:	
	:	
v.	:	Docket No. C-2026-
	:	
Interstate Paving Company, LLC	:	

**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 the Bureau 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: January 8, 2026

  
\_\_\_\_\_  
Sara Andrade-Locke  
Damage Prevention Supervisor  
Damage Prevention Section  
Bureau of Investigation and Enforcement  
Pennsylvania Public Utility Commission  
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** AVR2025APR300004  
**AVR Version** 1  
**First Name** GARRETT **Last Name** REED  
**Company Name** UGI UTILITIES INC  
**Address** 1301 AIP DRIVE  
**City** MIDDLETOWN  
**State** PA  
**Zip Code** 17057  
**Email** damageinquiry@ugi.com **Phone**  
**Ext**

## Role

**Submitter Role(s) (?)**

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Facility Owner | <input type="checkbox"/> Designer           |
| <input type="checkbox"/> Excavator                 | <input type="checkbox"/> Project Owner      |
| <input type="checkbox"/> Locator                   | <input type="checkbox"/> Enforcement Agency |
| <input type="checkbox"/> Other                     |   |

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 submit a locate request to identify the location and type of facility owner through the One Call System in advance of beginning excavation or demolition work §5(2.1)

When did the alleged violation occur? (?) 04/28/2025

09:53:00 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.

Related Damage Serial Number, if applicable

Other Related Serial Numbers (?)

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

Reason for Exemption

## Event Information



County CUMBERLAND  
Municipality SOUTHAMPTON TWP  
Ward  
Work Site 963 Baltimore Rd  
Nearest Intersection Daisy Rd  
Second Intersection  
Geolocation (?)

## Affected Facility Information



Primary Right of Way Type Private  
Public Right of Way Type  
Private Right of Way Type Land Owner  
Affected Operation Gas  
Facility Subtype Affected Distribution  
Facility Owner Company Name UGI Utilities, Inc.

Contact First Name

Last Name

Address

City

State

Zip

Email

Phone

Joint Trench?

Yes  No  Unknown

Involve Cross Bore?

Yes  No  Unknown

Measured Depth from Grade

Exact Measured Depth from Grade

Enter the inches or centimeters with number and measurement used

## Work Information



Start Date of Excavation (?)

Excavation Activity

DRIVEWAY WORK

Excavator Company Name

Interstate Paving LLC

Contact First Name

James

Last Name

Frye

Address

555 Belmont Rd

City

Gettysburg

State

PA

Zip

17325

Email

charity@interstatepavingllc.com

Phone

800-377-2167

Marked in White

Yes  No  Unknown

Method of Excavation

GRADING

Equipment Used

What Equipment was used for excavation or demolition when the event occurred?  
GRADER/SCRAPER

Type of Excavator

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

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?  Near Miss

OSHA Report Filed?  Yes  No

OSHA Report Number

Was 911 called?  Yes  No

Name of 911 Caller

Fire Response  Yes  No

Police Response  Yes  No

Did the incident cause any injuries?  Yes

Number of Injuries (?)

Did the incident cause any deaths?  Yes

Number of Deaths

Was there an evacuation?  Yes  No

Number of people evacuated?

Traffic Stopped?  Yes  No

Service Interrupted?  Yes  No

Duration of Service Interruption?

Exact Value of Service Interruption

Approximately how many customers were affected?

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?

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

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



# **I&E Exhibit 1A**



# **I&E Exhibit 1B**



# **I&E Exhibit 1C**



# **I&E Exhibit 2**

CDC 00000 POCS MM/DD/YY TT:TT:TT 20251181413-000 NEW NOCL EMER

=====  
Serial Number--[20251181413]-[000] Channel#--[0950A999][0180][2019-08]  
Message Type--[NEW][NO ONE CALL][EMERGENCY]

County--[CUMBERLAND] Municipality--[SOUTHAMPTON TWP]  
Work Site--[963 BALTIMORE]  
Nearest Intersection--[DAISY RD]  
Location Information--  
[ ]  
Caller Lat/Lon--[ ]  
Mapped Type--[P] Mapped Lat/Lon--  
[40.039051/-77.487015,40.039391/-77.486654,40.038932/-77.486021,  
40.038609/-77.486365]  
Attachments--[http://www.pa811.org/attachments/20251181413]  
Type of Work--[NO ONE CALL]  
Equip Present--[Y] Equip Identifier--[INTERSTATE PAVING]  
Active Digging--[Y] Markings Visible--[N]

Lawful Start Dates--[ ] thru [ ] Response Due Date--[28-Apr-25]  
Scheduled Excavation Date--[28-Apr-25]

Caller--[NOEL SCHOOLEY]  
Caller Phone--[717-753-0879]  
Reporting Company--[UGI UTILITIES INC]  
Address--[7 DYKEMAN COURT]  
City--[SHIPPENSBURG] State--[PA] Zip--[17257]  
FAX--[ ] Caller Type--[B]  
Email--[NSCHOOLEY@UGI.COM]

Prepared--[28-Apr-25] at [0953] by [CHRISTINA MCINTIRE]  
Remarks--  
[ ]

AI 0 AI =ADAMS ELEC COOP BSD0 BSD=BRIGHTSPEED FN10 FN1=CMBLD FRKLN JMA  
KCI0 KCI=ZITO MEDIA COMM LV 0 LV =PENELEC ME 0 ME =MET ED  
RS 0 RS =COMCAST CABLE SBA0 SBA=SHIPPENSBRG B/A UH40 UH4=UGI DAMAGES  
VO10 VO1=UGI SHIP WAYNES

Serial Number--[20251181413]-[000]  
=====  
Copyright (c) 2025 by Pennsylvania One Call System, Inc. =====

RESPONSES for S/N: 20251181413:

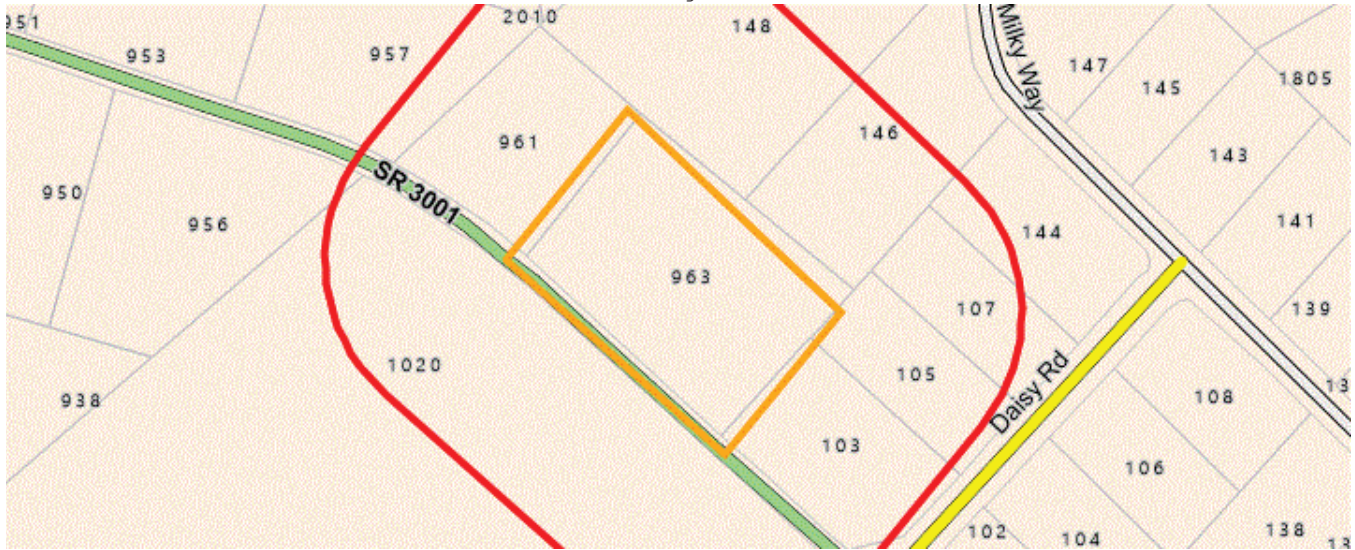
Ver	CDC	Name	Response	Time	Respondent
0	VO1	UGI UTL SHIP WAYNESBORO	VO1-FIELD MARKED	4/28/2025 10:28:14 AM	AAA-WEBSVC
0	UH4	UGI UTL DAMAGES	UH4-NO RESPONSE	4/28/2025 11:55:47 AM	Auto-KARL
0	SBA	SHIPPENSBURG BORO AUTH/SHIPPENSBURG BORO	SBA-CLEAR. NO FACILITIES OR FACIL NOT INVOLVED	4/28/2025 10:30:05 AM	HS-OTM
0	RS	COMCAST CABLE COMMUNICATIONS INC	RS-INSUFF INFO. DO NOT DIG	4/28/2025 10:44:52 AM	CLS-WEBSVC
0	ME	METROPOLITAN EDISON CO/FIRSTENERGY	ME-NO RESPONSE	4/28/2025 11:55:47 AM	Auto-KARL
0	LV	PENNSYLVANIA ELECTRIC CO	LV-NO RESPONSE	4/28/2025 11:55:47 AM	Auto-KARL
0	KCI	ZITO MEDIA COMMUNICATIONS LLC	KCI-CLEAR. NO FACILITIES OR FACIL NOT INVOLVED	4/28/2025 12:29:46 PM	TE-OTM
0	KCI	ZITO MEDIA COMMUNICATIONS LLC	KCI-NO RESPONSE	4/28/2025 11:55:47 AM	Auto-KARL
0	FN1	CUMBERLAND FRANKLIN JOINT MUNI AUTH	FN1-CLEAR. NO FACILITIES OR FACIL NOT INVOLVED	4/28/2025 10:38:37 AM	MR -KARL
0	BSD	BRIGHTSPEED	BSD-NOT MARKED. NO ACCESS	4/28/2025 11:31:16 AM	AAA-WEBSVC
0	AI	ADAMS ELECTRIC COOPERATIVE INC	AI-CONFLICT. DCTF BY FO	4/28/2025 10:44:52 AM	CLS-WEBSVC

DELIVERIES for S/N: 20251181413:

Ver	CDC	Name	To	Time	Seq	Type
0	VO1	UGI UTL SHIP WAYNESBORO	VO1	4/28/2025 9:53:20 AM	4	MAIL
0	UH4	UGI UTL DAMAGES	UH4	4/28/2025 9:53:27 AM	4	MAIL
0	SBA	SHIPPENSBURG BORO AUTH/SHIPPENSBURG BORO	SBA	4/28/2025 9:53:26 AM	3	MAIL
0	RS	COMCAST CABLE COMMUNICATIONS INC	RS	4/28/2025 9:53:19 AM	16	MAIL
0	ME	METROPOLITAN EDISON CO/FIRSTENERGY	ME	4/28/2025 9:53:24 AM	163	MAIL
0	LV	PENNSYLVANIA ELECTRIC CO	LV	4/28/2025 9:53:23 AM	149	MAIL
0	KCI	ZITO MEDIA COMMUNICATIONS LLC	KCI	4/28/2025 9:53:22 AM	1	MAIL
0	FN1	CUMBERLAND FRANKLIN JOINT MUNI AUTH	FN1	4/28/2025 9:54:30 AM	1	FM1
0	BSD	BRIGHTSPEED	BSD	4/28/2025 9:53:19 AM	58	MAIL
0	AI	ADAMS ELECTRIC COOPERATIVE INC	AI	4/28/2025 9:53:21 AM	14	MAIL



ATTACHMENT for S/N: 20251181413 (20251181413-0.gif):



**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

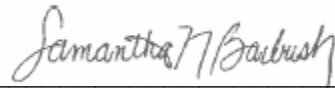
Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement	:	
	:	
v.	:	Docket No. C-2026-
	:	
Interstate Paving Company, LLC	:	

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing **Formal Complaint** in the manner and upon the parties listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

**Served via Certified Mail, Return Receipt Requested**

Interstate Paving Company, LLC  
1661 Hanover Pike  
Littlestown, PA 17340



---

Samantha N. Barbush  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 331654  
(717) 772-8582  
[sbarbush@pa.gov](mailto:sbarbush@pa.gov)

Date: January 8, 2026