

February 8, 2026

Public Utility Commission

400 North Street

Harrisburg, PA 17120

RE: C-2025-3055566 Bill Whelan vs PECO

PUC and Judge Quimby:

This is my reply to the Initial Decision on my case against PECO.

You say that Mr. Manley gave credible evidence that countered my assertion that there was one gas service line that is spliced over to neighbor's gas meter. I would like to review that evidence. He supplied a sketch of the two lines as they should be laid out under my front yard and a smaller piece under the neighbor's line. I objected to this document being admissible because the photos I furnished via the excavator prove that the gas line going to my neighbor's meter is not like what the sketch represents. The sketch represents two 90 degree turns from my property to their gas meter. The photos of the actual path of the line that was hit show a completely different story. Looking at the photos, you can clearly see that the gas line comes off their meter and goes left, not straight, and not right toward my property. Their service line goes several feet in the left direction before it starts to head back towards my property on an angle. That completely contradicts the sketch Mr. Manley provided and believes is true. If their service line was installed underground as the PECO sketch says, it never would have been hit during the excavation. The photos tell the true story here. Therefore, that sketch is not credible at all. The neighbor called the 8-1-1 number to insure they did not hit the gas line when planting a tree. PECO's line marking subcontractor used this false sketch to mark their gas line. Based on the lawn marking beings incorrect, we could have had another hit gas line at 7704 Beech Lane. I attached the PECO sketch

with a red solid line representing the true path of the gas line from the meter at 7704. Based on my photos, this is irrefutable evidence. There is also a red dash line that I believe is how the neighbor's line continues towards my property underground.

Mr. Manley said there is no tracer wire on the neighbor's line, and so it is not detectable. The photos prove this as well. Tracer wire has been used going back to the 1970s, yet there is no tracer wire for their section of gas line. The federal code is 49 CFR 192.321. Mr. Manley says that that requirement was not mandated in 1996? Pennsylvania's Underground Utility Line Protection Law - Act 287 has been around since 1974. If there are actually two service lines going all the way down to the main that were both replaced in 1996, why would one line have the tracer wire and one not? This makes no sense, but is considered credible?

Pennsylvania has a code regarding meter location and service line installation. It is listed as 44 Pa B. 5835. It explicitly says: "The service line must be installed in a straight line perpendicular to the main." The sketch Mr. Manley provided does not show a perpendicular line between the main and the gas meter at 7704. This is plain to see, and is not up to code.

Mr. Manley refutes my assertion that there is only one service line from the main up to a point approximately 5-6 feet from my meter and then spliced over to the neighbor's meter. He said that the gas line could not be spliced. This is a false statement. I will attach several samples of "T" fittings that are used in the splicing of gas lines. My contention is that the one service line is spliced to my meter and the other meter via a T fitting. The fittings I am referencing are made for this exact application – compatible with splicing or joining polyethylene gas lines. There are three types of the T fittings I will show you: electrofusion fittings, compression fittings and Con-stab fittings. All of them come in multiple sizes and meet the industry standards for the type of gas line PECO uses. On PECO's sketch, you can see two perfect right angles before the gas line reaches their meter. The polyethylene pipes are not meant to turn at sharp angles because they will crimp and possibly crack. Therefore, if those 90 degree angles were actually underground, they would require 90 degree elbow fittings. Any fittings

refute Mr. Manley's assertion that the gas lines cannot be spliced/joined. Here are samples of the T fittings I am referring to, and there are photos attached:

Electrofusion T fittings: <https://share.google/QwrzMu9ImBFaNOykF>

Compression T fittings: <https://share.google/UZ8p4Eghklwk7W1mF>

Con-stab T fittings: <https://www.supplyhouse.com/Wal-rich-2883010-2-IPS-Con-Stab-Tee-SDR-11>

In your Initial Decision document, on page 9, section 35, it says: "The service lines to the service address and the 7704 address are plastic pipes that are connected with "service tees"¹ to the gas main on the street in front of the houses, and the pipes run to the meters at the service address and the 7704 address. Tr 60,64." Service tees. He is referencing T fittings. I have been referencing the same category of fittings. And yet, Mr. Manley says the plastic gas lines cannot be spliced, and his testimony is credible despite this obvious contradiction? There is a foot note at the bottom of the page that reads: "Service tee" was not defined, but presumably this refers to a t-shaped connector." His testimony is making my case that my gas service line can indeed be spliced to 7704's gas meter via a T or tee fitting/connector. This point cannot be understated. Mr. Manley was PECO's main witness for the actual gas line specifications, and his testimony is contradictory and incorrect.

Mr. Manley stated that he came to our residence and spoke with my wife because PECO sent him out to "appease the customer." In light of everything I just outlined above, I believe the real reason that he was sent out was to rectify the improper installation of the gas line going to my neighbor's home. His remedy was to disconnect the neighbor's service line at their meter, and then to run a new line directly from the main to the meter. That is how it should have been done back in the day. And it would be perpendicular to the main as the code requires, and it would be installed with tracer wire so that it would be detectable. This remedy would involve digging in the street, digging up the neighbor's lawn, and probably damage to the sidewalks and curbing. All of this to appease the

customer? I do not believe that. It is much more plausible that PECO realized that the current layout and connections of the gas lines presents an unsafe situation that needs to be fixed. Of note, there was no mention of removing the neighbor's gas line from my property -- which I find very interesting.

To summarize, PECO has a sketch that was admitted into the court records (despite my objection) that does not represent the way the gas lines are laid out underground. Mr. Manley's testimony relies on that false document. Any future lawn markings will also be wrong based on this sketch. PECO does not know where 7704's gas line is. Since they have no way to locate it without the tracer wire being installed, another dangerous incident could happen. Mr. Manley made a statement that is incorrect regarding gas line splicing.

The Pennsylvania Underground Utility Line Protection Law - Act 287 is meant to prevent accidental gas line contact from contractors and home owners. And as I understand it, the PUC is there to enforce these rules. My case has proved (minimally) that PECO's records are incorrect and yet they presented these records, and defended them, as truth in our hearing.

See 52 Pa Code 59.37: "Each public utility shall keep complete maps, plans, and records of its entire distribution and other system showing the size, character, and location of each main, district regulator, street valve and drip, and each service connection, together with such other information as may be necessary. The maps, plans, and records required by the provisions of this section shall be kept up to date so that the utility may promptly and accurately furnish any information regarding its facilities, or copies of its maps upon request by the Commission."

It appears that your Initial Decision relies heavily on Mr. Manley's testimony and the PECO gas line "sketch" admitted in the hearing. I believe my responses above have outlined the flaws in both.

Therefore, I ask you to reconsider.

If your decision is final despite my responses above, I am left with only one choice to prove my case.

That is, when the spring comes, to carefully dig up the area where I believe the lines are spliced/joined and document everything with photos. If I decide on this course of action, I will contact the 8-1-1 number three days (minimally) prior. At that point, PECO will again send someone out to mark the gas

lines with that incorrect sketch.

Sincerely,

Bill Whelan



Electrofusion T



Compression T



Con-stab T



