

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF DELAWARE

IN THE MATTER OF THE CORRECTIVE
ACTION ORDER ISSUED TO IACONO-
SUMMER CHASE APARTMENTS, L.P. IN
ACCORDANCE WITH 26 DEL. ADMIN. C. §
8001 (FILED OCTOBER 30, 2015)

PSC DOCKET NO. 15-1599

MOTION FOR EXTENSION OF TIME

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Apartments, L.P.

March 21, 2016

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Iacono-Summer Chase Apartments, L.P. (“Iacono” or the “Company”), by and through its counsel, hereby moves the Delaware Public Service Commission (the “Commission”) for an extension of time to complete the replacement of its existing propane pipeline system, and in support of its motion states as follows:

1. The Company is the Operator, as set forth in 26 *Del. C.* § 802(11) and 26 *Del. Admin. C.* § 8001, of the propane gas distribution system at Village of Canterbury, 9000 Rembrandt Circle, Newark, DE 19711 (the “Property”).

2. On November 3, 2015, the Commission found that the current pipeline distribution at the Property posed a threat to life and property and issued Corrective Action Order No. 8813 to the Company.

3. The Company met with Commission Staff on November 30, 2015 to discuss implementation of Corrective Action Order No. 8813 and the potential replacement of the current pipeline distribution at the Property rather than conversion to natural gas.

4. On December 3, 2015, the Commission entered Amended Corrective Action Order No. 8827, amending PSC Order No. 8813. Amended Corrective Action Order No. 8827 requires:

a. Iacono shall conduct weekly leak surveys of all active pipelines on the property beginning immediately and shall file the results with the Commission until the replacement of the existing propane pipeline system is complete. Iacono may install temporary propane tanks to serve buildings within the facility. In order to abandon any section of pipeline, Iacono shall cut and cap each end of that pipeline. Once an existing pipeline section has been abandoned, such section may no longer be part of the leak surveys.

b. Any leaks found during weekly surveys shall be repaired immediately, regardless of the nature or "Grade" of the leak.

c. Iacono shall perform a suitable test to determine the structural integrity of the existing underground propane tank and associated appurtenances and make any necessary repairs or replacements of any deficiencies or leaks found as a result of this test. In addition, Iacono shall perform cathodic protection testing to ensure there is no active corrosion occurring. Should deficiencies be found with the current cathodic protection system, immediate repairs shall be made to obtain satisfactory results. Iacono shall file the results of all such tests with the Commission.

d. By December 15, 2015, Iacono shall submit to the Commission its final plan to replace the existing propane distribution system at the Village of Canterbury. Iacono shall make every attempt to complete this work within four (4) months from the submission date.

e. If the replacement of the existing propane pipeline system of this complex is not 100% completed within four (4) months, the Commission shall consider further action at that time, including, but not limited to, the possibilities of granting reasonable time extensions or ordering the Operator to shut down operation of the propane pipeline system.

5. Iacono has contracted with Construction Unlimited ("CUI") to perform leak surveys of the Property. Weekly leak surveys of the active pipelines at the Property began on November 30, 2015 and continue to be conducted in accordance with PSC Order No. 8827.

6. On December 15, 2015, Iacono submitted to the Commission its final plan to replace the existing propane distribution system at the Property. The system replacement is being performed by Boulden Brothers, with CUI as its contractor, and is divided into five phases. The first four phases are to run new mains and service lines to the different residential units at the Property and install temporary tanks for each unit. Each of these phases was anticipated to

require 5 working days to complete, with construction proceeding sequentially from a start date of December 16, 2015. The last phase is to inspect the existing main underground propane tank, and run gas mains and tie gas lines to each of the units. This phase was anticipated to require 10 working days to complete.

7. System replacement is proceeding at the Property slower than anticipated in the submitted plan. The primary reasons are: (i) due to the amount of hand digging that has to be done because of other utility lines in the work areas, only four to five pipeline connections are being completed per day, as opposed to the anticipated ten to twelve; and (ii) lost weather days (8 in January, 8 in February and 1 in March to date). (See attached March 14, 2016 letter from Boulden Brothers).

8. The first two phases of the system replacement have been completed at the Property, and work is now proceeding on phase three. (See attached March 15, 2016 letter from CUI). It is now anticipated that each of the remaining phases will take approximately 15 working days to complete.

9. The remaining estimated construction time for the replacement of the propane pipeline system at the Property will extend the project completion time beyond April 15, 2016, the end of the four month period provided in PSC Docket No. 8827.

Accordingly, Iacono respectfully requests an extension until June 1, 2016 from the Commission for the time to complete the propane pipeline system replacement at the Property.



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March 21, 2016

CERTIFICATE OF SERVICE

It is hereby certified that the Motion for Extension of Time will be served this 21st day of March, 2016 with the Delaware Public Service Commission using Delafile and has also been served by electronic mail to the Commission's counsel, Ms. Brenda Mayrack.

/s/ Todd A. Coomes

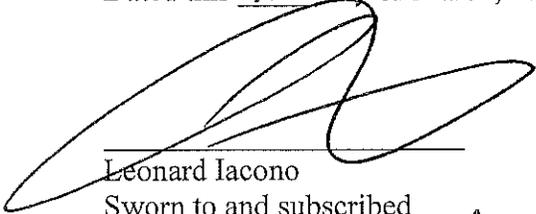
Todd A. Coomes (#4694)

STATE OF DELAWARE :
 : SS.
COUNTY OF NEW CASTLE :

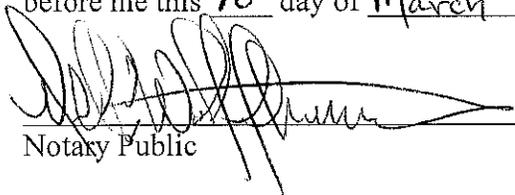
Leonard Iacono, being duly sworn, hereby verifies that:

1. I am the managing partner of Iacono-Summer Chase Apartments, L.P. and am authorized to make this affidavit on its behalf.
2. Insofar as the foregoing Motion for Extension of Time states facts, said facts are true and correct to the best of my knowledge, information and belief. To the extent any facts alleged are not in my personal knowledge, I believe them to be true and correct.

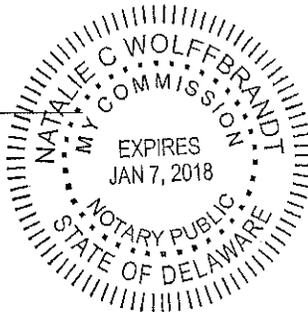
Dated this 18 day of March, 2016.



Leonard Iacono
Sworn to and subscribed
before me this 18th day of March, 2016.



Notary Public



Attachment 1



March 14, 2016

Iacono-Summer Chase Apartments, LP
Attn: Paul Chantler
102 Larch Circle, Suite 101
Wilmington, DE 19804

RE: Plan for Testing, Installation of Temporary Tanks, Inspection of 30,000 Gallon Tank, and Replacement of Existing Propane System.

Paul,

As requested here is an update on the testing of the existing gas lines, the placement of temporary tanks, and the replacement of the piping system.

The job has been proceeding slower than anticipated. Our contractor had estimated he would average between 10 and 12 connections per day, but the actual number has been only 4 to 5 per day due to the amount of hand digging that has to be done because of the other utilities in the area. Also, they have lost 17 days to weather so far: 8 in January, 8 in February, and 1 so far in March.

Weekly leak surveys began on 11/30/15 and will continue until the temporary tank system is fully in place for each phase. Once the temporary tank system is in place for each phase we will abandon the existing propane system and the weekly leak surveys for that phase will cease.

The temporary tanks and system replacement will be broken down into five phases.

Phase 1: Run new 2" mains and 3/4" service lines to the 5000 through 5900 units. Set 4-1,000 gallon tanks, connect them to the new service, and abandon existing gas lines. Complete.

Phase 2: Run new 2" mains and 3/4" service lines to the 6000 through 6700 units. Set 4-1,000 gallon tanks, connect them to the new service, and abandon existing gas lines. This should be completed today.

Phase 3: Run new 2" mains and 3/4" service lines to the 7000 through 7600 units. Set 4-1,000 gallon tanks, connect them to the new service, and abandon existing gas lines. Construction to begin upon completion of phase 2 and will require approximately 15 working days to complete.

Phase 4: Run new 2" mains and 3/4" service lines to the 8000 through 9200 units and the clubhouse. Set 4-1,000 gallon tanks, connect them to the new service, and abandon existing gas lines. Construction to begin upon completion of phase 3 and will require approximately 15 working days to complete.

540 Old Barksdale Road Newark, DE 19711-4534
(302) 368-2553 · (410) 398-9060 · (610) 268-0355 · (877) BOULDEN
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Heating · Air Conditioning · Plumbing · Water Conditioning · Electrical

Phase 5: Run 4" gas mains, tie gas lines installed in phases 1 to 4 into the new main, replace the vaporizers, and inspect the existing 30,000 gallon underground propane tank. Construction to begin upon completion of phase 4 and will require approximately 15 working days to complete.

If you have any questions, please feel free to give me a call at 302-368-2553.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mike Boulden', with a long horizontal flourish extending to the right.

Mike Boulden

Attachment 2



March 15, 2016

Mike Boulden
Boulden Propane Gas
540 Old Barksdale Road
Newark, DE 19711-4596

RE: Village of Canterbury Apartments
Newark, DE

Regarding building blocks of units 5000 and 6000; the piping/gas main and service replacement(s) have been leak surveyed & completed.

All piping that had had elevated gas propane readings have been replaced & are completed.

Building blocks of units 7000, 8000 and 9000; there have been no elevated gas propane readings detected from the leak surveys. The area seems to be clear from any emanate dangers. The pipeline will continue to be replaced accordingly.

All work has been performed and supervised by the expertise of Bob Shumate.