

# **Statewide Services, Inc.**

**Claim Division**

**1241 John Q Hammons Dr.  
P.O. Box 5555  
Madison, WI 53705-0555**

**VIA E-MAIL ONLY**

April 28, 2025

Intertek-PSI

Attn: Mr. Garrett Smith, Senior Corporate Counsel  
545 E. Algonquin Rd.  
Arlington Heights, IL 60005

Regarding:      Our Insured:      City of Watertown  
                         Claim No:          WM000142910424  
                         Your Claim No. 122402P (per Alex Earl at QBE)  
                         Date/Loss:          1/15/2024

Dear Mr. Smith:

Statewide Services, Inc. administers the claims for League Mutual Insurance, which provides the insurance coverage for the City of Watertown. As you know, we are in receipt of your above-captioned claim tender regarding damage that occurred at Johnsonville Sausage where PSI was doing contracted work, and where a water line on the Johnsonville Sausage property was struck during the work.

We have completed our investigation and find that the City of Watertown is not liable for this loss. Johnsonville Sausage was undertaking a private job on their land, and the City was charged with marking or flagging only their water main. Upon review of notes from and my conversation with the City's Water Department Manager, Mr. Peter Hartz, the City was charged with marking only their water main for the construction, and Mr. Harz advised such was done correctly. The damage occurred when a **private water lateral** owned by Johnsonville Sausage was struck or hit during PSI excavation work; and it appears this private water lateral was not marked, and this would be a private responsibility of Johnsonville Sausage and/or their contractors hired to work their project. Therefore, we recommend that the City of Watertown disallow this tendered claim.

Regarding liability, my "read" is this:

- 1) Johnsonville Sausage may be liable for not properly supplying their maps or diagrams of their privately owned water lines on their property to their contractors? Did the contractors request such?
- 2) PSI hired the firm All Line Utility Services for marking the Johnsonville Sausage water laterals and/or other utilities on their private land; however, it appears they failed to mark this water lateral in question. I understand from the City Water Department Manager, Peter Hartz, that said water lateral in question could have been properly traced and marked by the firm, independent of the City's properly marked water main.

Again, the City properly marked their water main as required; hence, our recommendation for the claim disallowance.

Thank you, Mr. Smith, and please do not hesitate to contact me with any questions.

Best regards,

*Doug Detlie*

Douglass A. Detlie

Casualty Claims Specialist

Office: 608-828-5503

Fax: 800-720-3512

E-mail: [ddetlie@statewidesvcs.com](mailto:ddetlie@statewidesvcs.com)

Cc: Ms. Megan Dunneisen, City Clerk

Mr. Steven T. Chesebro, City Attorney

Mr. Alex Earl, QBE Claims Adjuster