



RECEIVED
2019 AUG 30 AM 10:40
PA PUC
SECRETARY'S BUREAU

Secretary Bureau
Pennsylvania PUC
Commonwealth Keystone Building - 2nd Floor
400 North Street
Harrisburg PA 17120

Docket: L-2019-3010267

RE: Comments to the Pennsylvania Public Utility Commission's Advance Notice of Proposed Rulemaking Order on Proposed Amendments or Enhancements to Energy Transportation Regulations

To the Pennsylvania Public Utility Commission:

Over the past two decades Pennsylvania has emerged as one of the country's leading energy suppliers. Since 2013, the Commonwealth has passed five other states to become the United States' second largest producer of natural gas, which has had a significant impact on local economies, job growth and living standards.

The oil and natural gas industry supports over 322,000 jobs in Pennsylvania and more than \$44 million in economic activity. In 2017, the median income with one of the state's top producers exceeded \$113,000 – nearly double the state's overall median.

Pennsylvania's energy success relies on increased pipeline construction, which provides the safest and most reliable mode of energy transportation. The need for midstream infrastructure has helped the industry grow by more than 150 percent, which is responsible for more than 21,000 jobs.

Mariner East is expected to create over 57,000 direct and indirect jobs during construction, according to an analysis by Econsults Solutions. It will add as many as 530 permanent positions during operations. These jobs have been and will continue to be a windfall for Pennsylvanians. Many of the jobs created will employ workers in highly technical, and well-paying careers that offer family sustaining wages.

Pennsylvania has been fortunate to see a resurgence of the energy industry that revived the unions and our members across the state.

The proposal to “more comprehensively” regulate Pennsylvania’s energy pipeline developers threatens to reverse that hard-earned growth we have experienced. Stacking additional requirements on top of federal regulations will add unnecessary red tape and provide plenty of grey area for opponents to litigate and otherwise disrupt critical projects, which will unquestionably discourage developers from investing in new projects in Pennsylvania.

Pipelines are the safest means to transport energy products. In fact, pipelines are 4.5 times safer than transporting these products by rail, not to mention better for the environment.

Developers have an inherent interest in ensuring public safety, protecting local lands and water, and in the successful construction and operations of each project. Many pipelines, including the Mariner East, not only meet regulatory requirements, but voluntarily exceed what is required.

Mariner East employs the latest technologies to ensure the long-term safety of the project. The line utilizes internal monitoring systems, automated controls and shut-off capabilities, visual inspections and cutting-edge construction techniques—like specialized coatings to prevent erosion, x-ray welds and materials that exceed industry standards.

The company developing the pipeline, has been proactive in consulting stakeholders to account for on-the-ground and ecological sensitivities. It has provided comprehensive trainings to local personnel to minimize the likelihood risks and implement response protocols in the event of an incident.

Throughout the construction and operation of the Mariner East project the company has relied on Pennsylvania union labor. Unions in the Commonwealth are required to maintain safety training and updated technical skills to match the ever improving technology used on energy infrastructure projects.

Additionally, union members live throughout the very communities around the pipeline route and have a vested interest in guaranteeing the safety of the project. Union laborers are the daily eyes that monitor the project to see to it that the line is constructed and will operate safely.

Additional pipeline capacity is needed to support continued shale development. Meeting that demand will create jobs, which in turn will support businesses of all kinds throughout our economy. And, once completed, these projects will provide even greater access to affordable fuels produced here at home.

Federal regulations coupled with prudent local and state management provide a rigorous framework to protect our communities and the environment. Adding even more requirements will only complicate the system, deterring much needed investment and

could have a negative impact on community safety through reliance on alternative transportation methods.

I encourage you to oppose further regulation and to instead focus on ensuring the current rules are enforced appropriately.

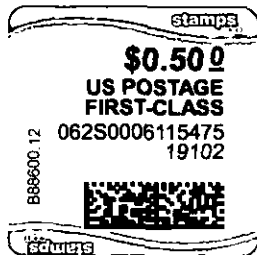
Sincerely,

A handwritten signature in cursive script that reads "Jim Snell".

Jim Snell, Business Manager
Steamfitters Local 420

Steamfitters Local 420
14420 Townsend Road
Philadelphia, PA 19154

PHILADELPHIA
PA 191
JUN 11 1991
PM 4 L



Secretary Bureau
Pennsylvania PCU
Commonwealth Keystone Building
2nd Floor
400 North Street
Harrisburg, PA 17120

17120-009399

