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

**Comments for a Pennsylvania Public Utilities Commission (PUC) public comment period on pipeline regulation. Docket: L-2019-3010267**

Dear Commissioners:

On behalf of JARI, I'd like to provide input on regulations concerning construction compliance and pipeline material safety.

Current Pennsylvania pipeline regulations are working to ensure public safety. In fact pipeline companies meet and often exceed federal pipeline safety regulations. An Accufacts report found this to be true of the Mariner East 2 pipeline, which has received unprecedented scrutiny from regulators and the public. That pipeline crosses an area that JARI represents.

The natural gas delivery system is the safest form of energy delivery in the nation (according to data collected by the U.S. Department of Transportation Pipeline & Hazardous Materials Safety Administration). As an example, all pipelines used in the Mariner East 2 project are coated with cathodic protection, which serves as an additional layer of protection from weathering. The cathodic protection prevents rusting and extends the lifetime of a pipeline. In fact, Mariner East 1 has operated safely since the 1930s thanks to features like cathodic coating.

In addition, pipelines use high tech systems, such as supervisory control and data acquisition systems, which monitors pressures, temperatures, flows, and equipment safety in real time. Another safety system, a computational pipeline monitoring system, improves the operator's ability to identify abnormal operating conditions through computational algorithms. In case of

an emergency, valves can be either manually or automatically shut off, and Mariner East 2 installed eight valves across 25 miles of pipe as a safety precaution, six of which are automated.

Despite exceeding many federal safety standards, and winning approval from state and federal levels after thousands of hours of consideration, the Mariner East project continues to face heightened public scrutiny despite agreeing to increased regulatory oversight, resulting in delays. With so many construction delays for infrastructure projects that have thoroughly completed every requirement will only scare off future investments and hurt the Pennsylvania job market. More regulation is not necessary at the state level, but more certainty is.

Pipeline investment is revolutionizing Pennsylvania's economy, and we should be working to keep it that way. The natural gas and oil industry supports nearly 322,600 jobs in our commonwealth and \$23 billion in wages (according to The American Petroleum Institute). The Mariner East project alone could create a total of over 57,070 direct and indirect jobs during the construction phase using union labor and approximately 350 - 530 permanent positions throughout Pennsylvania (according to a 2018 economic report by Econsult Solutions). Once constructed, the underground pipeline will stimulate our local economy and provide long-term tax revenues for counties to invest in roads, schools, and public safety in addition to the assurance that these energy resources will be transported safely to market.

Pipeline industry standards are already adequate, so there is little to gain from further regulating construction safety, except more inefficiencies and delays. We cannot afford additional red tape or barriers to investment in our state.

Sincerely,



Linda Thomson  
President and CEO  
JARI

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