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House of Representatives COMMONWEALTH OF PENNSYLVANIA HARRISBURG

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September 9, 2019

PA PUBLIC UTILITY COMMISSION Ms. Rosemary Chiavetta, Secretary SECRETARY'S BUREAU Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street, Second Room Harrisburg, PA 17120

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RE: Addendum to Comments on Docket No. L-2019-3010267 Advanced Notice of Proposed Rulemaking Order (August 2, 2019)

Dear Secretary Chiavetta,

As State House Representative of the 156th Legislative District in Pennsylvania, I am submitting an addendum to my previous comments on Docket No. L-2019-3010267 of August 2, 2019. As I mentioned in my earlier letter, my district has many existing pipelines running through it, new ones under construction or undergoing repurposing, and yet more planned. I along with other elected officials, residents, school districts, senior homes, and emergency personnel have had ongoing safety concerns about this project.

My new recommendations are:

- Require independent pipeline inspections upon installation of pipelines and before pipeline goes into service.
- Require liquid leak detection sensors be placed under pipes which are located underground to immediately detect leakage. FERC has apparently not responded to public comments on this.
- Require double wall piping for underground piping systems when these systems are
- Require schedules to update and/or replace pipelines. Also, when pipelines are repurposed from natural gas to petroleum liquids or vice versa, a detailed technical evaluation should be made, which relates to a change in service. This should be required for all pipes which are of advanced age, or where a change is service is planned.
- Require safe spacing of underground pipes. The minimum spacing between underground pipes is five feet or more to allow for repairs to be made to a pipe and/or for inspections where leakage is suspected. The minimum spacing applies where backhoes are to be used and to allow for sidewall slumping is five feet. Proper spacing allows for inspection and/or repairs to one pipeline while the next closest pipeline remains in service. Many

Secretary Rosemary Chiavetta August 2, 2019 Page 2

pipes in the United States are buried to a depth of three feet to the top of the pipe from the ground surface. Some pipe spacing can be tens of feet or more, particularly where the pipeline is to carry petroleum. Distances from pipes to buildings can be 20 to 50 feet or more from the outermost pipe in a group of pipes.

Require as part of Contingency Plans and Emergency Response Plans, that local first
responders complete a guided tour of new pipelines conducted by the pipeline operator.
This tour should include the piping, metering stations, compressor stations and any
planned staging or equipment storage areas. Once the tour is successfully completed, the
local first response personnel can be given a Certificate to attest that they have completed
the appropriate training.

We have an opportunity to establish effective regulations and oversight particular to NGLs, which have their own unique qualities and dangers. This is a responsibility that we must not take lightly. We owe it to ourselves, our fellow citizens, and to the generations to come.

Thank you very much for your consideration. Please do not hesitate to contact me should you have any questions.

Sincerely yours,

Representative Carolyn T. Comitta 156th Legislative District

Caroly T. Comitta

CTC/jml





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