



Labor & Management ▶ Building Our Region's Success

April 12, 2022

Pennsylvania Public Utility Commission
400 North Third Street
Harrisburg, Pennsylvania 17120

SUBMITTED ELECTRONICALLY

Re: Docket No. L-2019-3010267: Hazardous Liquid Public Utility Safety Standards –
Notice of Proposed Rulemaking

To the Commission:

On behalf of the Builders Guild of Western Pennsylvania, representing the contractors and working men and women who build the world around us, we appreciate the opportunity to comment on the Commission's proposed pipeline rule.

We urge the Commission to reject the rule at this time. The Commission has not demonstrated that the proposal would not run afoul of the Pipeline and Hazardous Materials Safety Administration, the federal agency responsible for administering the country's pipeline safety laws and regulations. Furthermore, the Commission has not documented the expected cost-of-compliance that this rule would require, therefore it is impossible for regulators or the general public to know whether this rule is warranted and appropriate.

Pennsylvania is a major energy and chemical producing state, and those industries support tens of thousands of family-sustaining jobs in the Commonwealth. At the same time, energy is essential for powering the economy, and the chemicals covered by this proposed rule, such as butane, propane, and ethane, are key elements for manufacturing all manner of goods necessary to keep the world safe.

As a result, the Commission should proceed cautiously when imposing new regulations that will affect vast swaths of the economy. Under the existing state and federal regulatory schemes, pipelines have proven to be far safer for transporting hazardous liquids than trucks or railroads.

Should the implementation of this new rule cause a shift from pipelines to other modes of transport, then it could result in lost jobs and economic vitality while at the same time increasing risk to Pennsylvania residents.

As a result, we urge the Commission to reject this pipeline rule proposal unless and until an adequate analysis of the cost of compliance compared to the presumptive benefits is conducted and provided for public comment and feedback.

Respectfully,

Thomas Melcher
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