

April 12, 2022

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street – Second Floor North  
Harrisburg, PA 17120

**Re: PUC Proposed Rulemaking- Docket No. L-2019-3010267**

On behalf of the Consumer Energy Alliance (CEA), I am writing today to oppose the proposed rulemaking by the Pennsylvania Public Utility Commission (PUC) as referenced in Docket No. L-2019-3010267 related to the pipeline transport of petroleum products and hazardous liquids in intrastate commerce.

CEA supports strong pipeline safety standards and rigorous oversight to protect the public and the environment. Unfortunately, as written, this proposal imposes excessive regulations on pipelines in Pennsylvania that could negatively impact both local and national consumers, as well as the state and overall U.S. economy. This is a broad overreach by the commission. And while these proposed regulations should not be imposed on any pipelines, they most certainly should not be imposed on existing and operational pipelines, as any interruption or gaps in service would have drastic impacts on energy costs and access.

CEA represents more than 350- member companies with more than 550,000 individuals nationwide. As a nationwide organization with a Pennsylvania presence that advocates for all types of energy resources, we are committed to ensuring that all families, specifically those on fixed or low-incomes, and businesses have the ability to meet budgets, payrolls, and access to the energy they need. CEA supports actions that thoughtfully advance our nation towards a cleaner, more environmentally responsible energy future. We believe that responsible policies always consider the needs of consumers while leveraging and supporting the development of state-of-the-art technologies to improve our environmental stewardship, aiding in the continued reductions of all emissions. Unfortunately, the proposed rulemaking would disproportionately affect those individuals who are living paycheck to paycheck when access to energy is delayed and prices are increased.


It is our understanding that the new rules, as written, would result in a multi-billion-dollar imposition for pipeline operators, raising costs for consumers, disrupting service, reducing access to energy and disturbing roads and more landowner properties. The potentially massive cost and delays will lead to new supply chain issues already exacerbated by the pandemic. For example, we have learned that lowering the existing 8-inch Mariner East 1 line to 12 inches of underground clearance would be extremely costly while affecting properties and access along the way.

As the pandemic has illustrated, supply chains --- specifically those that support our energy sector --- are vital to access. If these pipeline regulations were to be passed, the pause in operations would lead to a trickledown effect, forcing utility companies to file more rate cases, passing the cost to consumers.

The PUC's mission is to "ensure safe and reliable utility service at reasonable rates." This proposed regulation would negatively affect all these goals. The Pipeline and Hazardous Materials Safety Administration (PHMSA) already administers comprehensive federal safety regulations that ensures high standards for environmental protection and the public. PHMSA is addressing relevant issues in ongoing rulemakings, in which the administration is required to do a cost-benefit analysis, and the PUC should wait for their guidance on the matter before pursuing new rulemakings that could overlap or prove redundant.

On behalf of CEA, I strongly urge the commission to reconsider the proposed rulemaking in Docket No. L-2019-3010267. The costs and delays outweigh the benefits to consumers locally, statewide and across the nation.

Sincerely,

A handwritten signature in black ink that reads "Michael Butler". The signature is written in a cursive, slightly slanted style.

Mike Butler  
Mid-Atlantic Executive Director  
Consumer Energy Alliance