

Steamfitters 449



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

April 4, 2022

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

On behalf of Steamfitters Local 420 in eastern Pennsylvania and Steamfitters Local 449 in western Pennsylvania, we stand united in our opposition to the Public Utility Commission's proposed rulemaking that would subject pipelines to unnecessary and costly regulations.

Our unions are made up of skilled craftsmen who install and service gas pipelines across the commonwealth. Our goal is to support and grow critical infrastructure projects in Pennsylvania and bring prosperity to individuals and businesses alike. We work to provide reliable and affordable energy that bolsters the economy. For us to continue to do this safely and responsibly, we need regulations that do not unnecessarily restrict our projects.

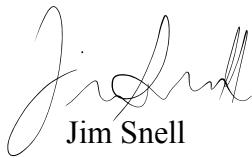
That is what this proposed rulemaking would do. It would impose additional regulations on an already highly regulated sector that will be costly to consumers and producers. Through construction and development of critical pipeline projects, we have been able to deliver butane and ethane energy products that are much needed throughout Pennsylvania, providing hard-to-reach areas of the commonwealth with the affordable energy they need. The regulations as currently written will directly reduce access to natural gas liquids. Reducing access will further worsen the supply chain shortages we have been experiencing, while increasing costs for energy and fuel and simultaneously decreasing reliability.

We have always performed our work with maximum safety and minimal disruption in mind, as pipeline projects already have some of the highest regulations to meet. Comprehensive and adequate federal safety regulations already exist, administered by the Pipeline and Hazardous Materials Safety Administration. PHMSA also conducts a cost-benefit analysis with its regulations, but the PUC has not conducted a cost-benefit analysis for this proposed rulemaking, leaving Pennsylvanians in the dark about the true cost of its impacts.

The PUC's proposed rulemaking would make Pennsylvania pipelines the most highly regulated of any state. If applied to existing, in-service pipelines, these regulations would also unnecessarily disturb roads and properties, disrupt pipeline service, and ultimately impact consumers' access to fuel and natural gas liquids like propane and butane. That level of unnecessary regulation would discourage growth or expansion of the industry. At a time of extreme energy supply shortages, this is not in the best interest of Pennsylvania communities.

On behalf of Steamfitters Local 420 in eastern Pennsylvania and Steamfitters Local 449 in western Pennsylvania, we urge you to reconsider adopting the new rulemaking being considered in Docket No. L-2019-3010267. The commission should not impose additional and unnecessary regulations on pipelines that will be costly to consumers and our state and national economies.

SINCERELY,



Jim Snell
Business Manager
Steamfitters Local 420



Kenneth Broadbent
Business Manager
Steamfitters Local 449