

# WASHINGTON TOWNSHIP SUPERVISORS

Ray Guzic, Jr.

Jaime Hartline

Scott Guzic

PO Box 56, Jones Street

Lilly, PA 15938

Phone: 814-886-5359 Fax: 814-886-7959

E-mail: [washtwpc@comcast.net](mailto:washtwpc@comcast.net) Website: [www.washington-cmsa.com](http://www.washington-cmsa.com)



April 06, 2022

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, Filing Room  
Harrisburg, PA 17120

RECEIVED  
2022 APR 13 AM 10:44  
PA P.U.C.  
SECRETARY'S BUREAU

Re: Docket No. I-2019-3010267; Rulemaking Regarding Hazardous Liquid Public Utilities

Dear Secretary Chiavetta:

I am writing on behalf of Washington Township to express concern with the Pennsylvania Public Utility Commission's recent Notice of Proposed Rulemaking (NOPR). Washington Township is a rural community in Cambria County in the Allegheny Mountains. As you may know, construction of the Mariner East Pipeline system took place in our community for several years beginning in 2016. While Energy Transfer worked well with our community and maintained good lines of communication throughout the duration of the project, their activities did impact our roads and create occasional inconveniences in our community. Washington Township provides the following comments for the Commission's consideration.

In addition to the fact that the proposed regulations will increase energy costs in a time when the cost of gasoline is at an all-time high, I am specifically troubled by the requirements in section §59.137(e) and § 59.137(f) that overhaul the existing federal depth of cover and separation of pipe requirements. As you are aware, these proposed regulations are in conflict with the federal regulations that have ensured safe pipeline operations for many years. Exceeding the existing federal regulations in this case will create significant additional impact in our community to the extent an operator is required to add additional depth of cover to existing pipelines.

As a rural community, our single largest expense is road maintenance and repair. To that end, I am also concerned by the proposal to require 12" of separation between underground structures. In addition to Energy Transfer's assets, Washington Township has other gas transmission lines, water and sewer lines, local gas and electric utilities and communications conduit within our municipality. Many of these underground structures are located adjacent to or within roadways. To the extent this proposed regulation would apply to existing pipelines, complying with this proposed regulation would create a significant disruption to our community as roads are dug up to move and/or lower existing facilities.

While the proposed regulations may have been written with the intent to improve pipeline safety, I would urge you to consider the additional impacts, excavation and potential for accident that meeting this requirement would cause throughout Pennsylvania. The Township does not support implementation of the proposed regulations as drafted.

Sincerely,

A handwritten signature in cursive script that reads "Jaime Hartline". The signature is written in black ink and is positioned above the printed name.

Jaime Hartline  
Washington Township Chairman