

Ms. Rosemary Chiavetta, Secretary
COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET
HARRISBURG, PENNSYLVANIA 17120
October 24, 2022

Subject: Motion to the Commission to Expedite Determinations Regarding the Pipeline Safety Including the Regulatorily Required Installation, Maintenance, and Use of Utility-Owned Curb Valves as Connected to Service lines.

Reference: Columbia Gas of Pennsylvania Rate Case Docket R-2022-3031211 Pennsylvania Public Utility Commission v. Columbia Gas of Pennsylvania, Inc.

Secretary Chiavetta -- **Please provide this document to the Commission for their consideration and action either inside or out of the referenced rate case.**

At Issue: This Rate Case is about to dismiss safety concerns with Columbia's and the Commission's approach to safety. Extraordinary risks deserve an extraordinary look. Safety is built into operations but so are hazards.

Administrative Law Judges' FINDINGS OF FACT 17 . "Columbia and I&E presented evidence as relates to the adequacy of Columbia's curb valves and ability to shut off gas in case of an emergency. Columbia St. No. 1- R at 18-19; I&E St. 4-SR at 10-11."

Culbertson Exception 14 (Page 108) to the Administrative Law Judges Recommended Decision.

Mr. Culbertson also expressed safety concerns regarding the installation of curb valves and the ability to shut off gas in case of an emergency. Columbia RB at 15 (citing Culbertson MB at 36).²⁵⁷ However, Columbia asserts Mr. Culbertson did not present any evidence that safety issues exist on Columbia's system. Columbia RB at 15. To the contrary, Columbia witness Kempic explained that Columbia's safety standards require that each service line have a shut off valve outside the home, and the safety standards specify when a curb valve should be used.²⁵⁸

*Mr. Kempic also explained that a meter valve enables quicker shutoff during priority situations since it is located above ground and next to the meter, which makes it easy to locate for a quick resolution. A curb valve, on the other hand, is not in plain sight or near the meter, and often requires personnel to be called out to locate it.*²⁵⁹ *Columbia RB at 15.* [See the requirements of 49 CFR § 192.385 Manual service line shut-off valve means a curb valve or other manually operated valve located near the service line that is safely accessible to operator personnel]

I&E witness Merritt [A PAPUC I&E employee] agreed with Columbia witness Kempic and stated as follows with respect to Columbia's practice of installing curb valves:

257 *A question regarding the use of curb valves arose during the public input hearing. (Tr., p. 87).*

Q. DO YOU AGREE THAT COLUMBIA'S PRACTICE COMPLIES WITH THE REGULATIONS?

A. Yes. According to § 192.365, "each service line must have a shutoff valve in a readily accessible location that, if feasible, is outside of the building." § 192.365 also states, "Each service line valve must be installed upstream of the regulator or if there is no regulator, upstream of the meter."

§ 192.365 does require a "covered durable curb box or standpipe" for each underground service line valve, but it does not specify that an operator must install the upstream shutoff valve at the curb. It is a common practice for operators to install an upstream valve at the riser and not at the curb. This practice is satisfactory according to § 192.365.[260]

To be clear, Columbia and the Commission have given the short shrift to safety. Safety concerns should have been better dealt with to protect the public. George Milligan, Columbia's employee that provided public testimony at the Public Input Hearing was not properly explored with discovery nor were the concerns of Columbia's workers when they voted to go on strike for safety reasons.¹

¹ More than 200 Columbia Gas workers authorize strike <https://www.wtae.com/article/columbia-gas-workers-authorize-strike/38221293#> The workers said they are concerned over unsafe work by contractors. ... Union members said there have been at least 50 safety incidents caused by contractors over the last 13 months involving equipment not being installed properly, leading to gas leaks in homes.

Mr. Kempic is wrong and so is I&E witness and employee Mr. Merritt. Mr. Merritt omitted some other very important safety references in his response.

Title 66 § 192.803 Definitions. Abnormal operating condition means a condition identified by the operator that may indicate a malfunction of a component or deviation from normal operations that may:

(a) Indicate a condition exceeding design limits; or

(b) Result in a hazard(s) to persons, property, or the environment.

... Qualified means that an individual has been evaluated and can: Perform assigned covered tasks; and Recognize and react to abnormal operating conditions.

George Milligan, Columbia's employee, in his testimony, showed he could recognize abnormal operational conditions and tried to react by going to his management and the Commission with safety concerns. So did Culbertson in October 2016 and thereafter when Columbia installed its service line at 1608 McFarland Road in front of a window after they abandoned their service line that did have a curb valve. Culbertson's reacting extends from October 2016 to this document.

Not having the proper valves in the proper location during an emergency can result in disaster—death, injury, property damage, and disruption to communities.

Mr. Kempic, I&E's attorney, and Mr. Merritt of I&E should be well aware of the gas explosion in Millersville, Pennsylvania.

From the National Transportation Safety Board Pipeline Accident Brief UGI Utilities Natural Gas-Fueled Explosion Millersville, Pennsylvania, July 2, 2017.

<https://www.nts.gov/investigations/AccidentReports/Reports/PAB1901.pdf>

*The technician was near the gas meter for 206 Springdale Lane when the explosion occurred. The two gas employees, who were digging at the main in front of the home, had fully excavated the plastic main and were ready to squeeze-off the plastic main line when the explosion occurred. [There was no curb valve but there should have been] The representative from LASA [Lancaster Area Sewer Authority] was walking in the cul-de-sac when the explosion occurred. **The technician located near the gas meter was killed, and three others were injured.***

Being at the meter during an explosion is not a safe place to be. During an emergency, the valve at the meter is not readily accessible.

There are also other legal and practical reasons to install curb valves. *Title 66 § 1510. Ownership and maintenance of natural and artificial gas service lines.*

A public utility shall not be authorized or required to acquire or assume ownership of any customer's service line. ... Maintenance of service lines shall be the responsibility of the owner of the service line.

Line testing is a maintenance function. The curb valve becomes the method of determining the location of a leak -- on the utility's property or the private property owner's property.

The most outrageous inclusion was the position of Columbia's president that **curb valves** were no longer necessary. Granted it is normally more efficient to turn off gas to a home at the meter – but not necessarily in an emergency. Then Inspections and Enforcement submits an opinion of their internal expert that supports Columbia's opinion but leaves out the most important part of the Federal Safety Regulations – safety.

That probably means I&E is not nor will not enforce the required use of curb valves with other PA gas distribution companies. That is alarming and dangerous! The five-member Commission must recognize that not having curb valves and other valves appropriately can be harmful to persons and property.

I&E for some reason defends Columbia over customers. I&E had a different position with UGI in 2020.

Explosion at Millerville.

PUC Approves Gas Explosion Settlement with UGI Utilities, Inc. – Gas Division

Published on 10/29/2020

Filed under: [Gas](#)

Extensive Safety and Training Enhancements Required Following PUC Investigation of Deadly 2017 Explosion in Millersville, Lancaster County

HARRISBURG – The Pennsylvania Public Utility Commission (PUC) today approved a [Joint Petition for Approval of Settlement](#) with UGI Utilities, Inc. – Gas Division (UGI) that includes new gas safety enhancements, the opening of a new company emergency response training center and a **\$1.1 million civil penalty**.

The settlement was reached as part of an investigation into a 2017 natural gas-fueled explosion that resulted in one fatal injury to a UGI employee, non-life-threatening injuries to three other individuals, and approximately \$2.2 million in damage to the surrounding properties on the Springdale Farms residential development in Millersville, Lancaster County.

As the result of this PUC settlement, UGI will spend more than \$50 million on safety enhancements, infrastructure replacement and additional training – all focused on preventing future incidents.

The Commission voted 4-0 to [approve the settlement](#) - filed on September 1, 2020, by the Commission’s Bureau of Investigation and Enforcement (I&E) and UGI, concerning the [Formal Complaint filed by I&E against UGI on October 4, 2018](#). In addition to the new training center and civil penalty, the settlement contains certain gas safety enhancements, including:

-Enhanced emergency response training for UGI personnel and contractors on changes related to the company’s General Operations Manual (GOM), Emergency Plan, and Incident Command Structure;

-Clarified dispatch procedures and new employee training in the “Make Safe” and emergency Pennsylvania One Call requirements incorporated into the GOM;

-Ensured availability of UGI’s “One Call” Operations and Engineering Personnel for emergency response;

-Continued acceleration of UGI’s Mechanical Tapping Tees remediation activities, as part of its Distribution Integrity Management Program;

-Improved ability to identify valves and isolate gas flow during hazardous leak events:

-Improved procedures concerning first responders’ authority to shut valves and curtail electricity in appropriate circumstances during an

emergency; **Enhanced safety perimeters** during Abnormal Operating Conditions, based on best practices using operating pressure and size of pipe to determine the size of the perimeter; and

-Assessment of current procedures, and possible modifications of procedures, for managing atmospheric gas found in a structure and potentially removing gas meters when atmospheric gas is detected.

The complaint filed by I&E alleged that UGI failed to follow its internal, written procedures on July 2, 2017, and the company's procedures in place at the time of the explosion were deficient, especially in recognizing and managing an underground blowing gas situation.

UGI provides service to approximately 650,000 residents and businesses in 45 counties across Pennsylvania.

Culbertson Note: It appears I&E did not identify or address the root cause of the explosion. The faulty part was an outside problem, at the main, the leak should have vented outside, but somehow the leak vented inside the home. That would be an installation deficiency of the lack of a curb valve. If the utility had installed a curb valve, the leak at the main would have vented at the curb valve, not into the home. Granted, the gas leak should have never vented into the home.

Not having a curb valve may have

cost the life of a utility worker.

It is unbelievable and outrageous that the same Pennsylvania Public Utility Commission's Bureau of Investigation and Enforcement (I&E) with UGI files a complaint regarding the identification of valves during an emergency and requires "-Improved ability to identify valves and isolate gas flow during hazardous leak events" – then I&E has an employee who agrees with the President of Columbia gas that valves at the meter are good enough. Then the ALJs' make the wrongful assertions of the President of Columbia and I&E's witness a finding of fact.

So with this, what is the position of the Commission regarding the installation, maintenance, and use of curb valves? The requirements are different from Columbia and the rest of the gas distribution companies? Curb valves are no longer required for all Pennsylvania gas distribution companies? Or, that I&E, I&E's witness, Columbia's President, and the ALJ's erred, and it is the position of the Commission that curb valves are required consistent with good safety, regulatory and legal requirements.

Again from I&E's employee witness:

Q. DO YOU AGREE THAT COLUMBIA'S PRACTICE COMPLIES WITH THE REGULATIONS?

A. Yes. According to § 192.365, "each service line must have a shutoff valve in a readily accessible location that, if feasible, is outside of the building." § 192.365 also states, "Each service line valve must be installed upstream of the regulator or if there is no regulator, upstream of the meter."

§ 192.365 does require a "covered durable curb box or standpipe" for each underground service line valve, but it does not specify that an operator must install the upstream shutoff valve at the curb. It is a common practice for operators to install an upstream valve at the riser and not at the curb. This practice is satisfactory according to § 192.365.[260], "each service line must have a shutoff valve in a readily accessible location that, if feasible, is outside of the building." § 192.365 also states, "Each service line valve must be installed upstream of the regulator or if there is no regulator, upstream of the meter."

I&E should have had follow-up questions based on Columbia's internal policy, the legal responsibilities of owners of service lines and customer's service lines, and regulatory requirements. The questions should have been about the adequacy of Columbia's operating procedures as they are or are not consistent with safety regulations, standards, and codes. Does Columbia have shut-off valves that are readily available to safely shut off gas to a building?

49 CFR § 192.365 Service lines: Location of valves.

(a) Relation to regulator or meter. Each service-line valve must be installed upstream of the regulator or, if there is no regulator, upstream of the meter.

(b) Outside valves. **Each service line must have a shut-off valve in a readily accessible location** that, if feasible, is outside of the building.

(c) Underground valves. Each underground service-line valve must be located in a covered durable curb box or standpipe that allows ready operation of the valve and is supported independently of the service lines.

So what is a "**readily accessible location?**"

Per 49 CFR § 192.181 - Distribution line valves. (c) 1) The valve must be placed in a readily accessible location so as to facilitate its operation in an emergency.

Readily accessible also means readily visible and finable.

From the Pipeline and Hazardous Materials Safety Administration (PHMSA), Interpretation Response #PI-00-0101 (08-01-2000) <https://www.phmsa.dot.gov/regulations/title49/interp/PI-00-0101>

*““Of particular interest is § 192.365(b), which requires each service line valve to have “a” shut-off valve in a readily accessible location that, if feasible, is outside of the building.” **This regulation is intended to facilitate the control of gas flow to a building in an emergency.**”*

If there is no curb valve, then emergency responders are put at undue risk.

From the PHMSA – To PA PUC

May 17, 1989

Mr. Williams E. Smeigh, Jr., Supervisor

Commonwealth of Pennsylvania

Pennsylvania Public Utility Commission

P.O. Box 3265

Harrisburg, PA 17120

Dear Mr. Smeigh:

Your May 9, 1989, letter requests guidance as to the meaning of "feasible" under 49 CFR 192.365(b), which reads:

(b) Outside valves. Each service line must have a shut-off valve in a readily accessible location that, if feasible, is outside of the building.

Under Part 192, ordinary words, such as "feasible," that are not defined in §192.3 and do not have a special pipeline meaning are used as they are commonly understood by English speaking people in the U.S. In this sense, the word "feasible" means capable of being done or accomplished.

Given this understanding, **we believe a situation would seldom occur in which it is not feasible to install a service line shut-off valve outside a building in a readily accessible location**. Certainly, none of the excuses put forth in your letter allows an operator to avoid outside installation under §192.365(b). Outside installations by the other operators under your jurisdiction in similar situations should readily support this position.

Sincerely,

Richard L. Beam,

Director

Office of Pipeline Safety

<https://www.phmsa.dot.gov/sites/phmsa.dot.gov/files/legacy/interpretations/Interpretation%20Files/Pipeline/1989/PI89005.pdf>

From Columbia Gas of Pennsylvania STANDARDS FOR CUSTOMER SERVICE LINES, METERS, AND SERVICE REGULATORS (Plumber's Guide)

1.6 DEFINITIONS: "Accessible, Readily – Immediate availability in case of emergency, repair, or inspection."

https://www.columbiagaspa.com/docs/librariesprovider14/contractors-and-plumbers/plumber-qualifications/plumber's-guide.pdf?sfvrsn=e6447951_11

Just based upon §192.365, safety considerations and legal responsibilities of owners of service lines and customer's service lines, Columbia should have installed curb valves on all of its service lines.

PA PUC I&E should also have asked their internal expert. What about the requirement of 49 CFR § 192.385 Manual service line shut-off valve installation? And why didn't they -- Not knowing it existed or an intentional omission?

(Not to be confused with 49 CFR § 192.365 Service lines: Location of valves.)

49 CFR § 192.385 Manual service line shut-off valve installation.

(a) Definitions. As used in this section:

Manual service line shut-off valve means a curb valve or other manually operated valve located near the service line that is safely accessible to operator personnel or other personnel authorized by the operator to manually shut off gas flow to the service line, if needed. [The valve at the end of the riser is excluded because it connects to the meter assembly not the service line or the customer's service line.]

(b) Installation requirement. **The operator must install either a manual service line shut-off valve** or, if possible, based on sound engineering analysis and availability, an EFV for any new or replaced service line with installed meter capacity exceeding 1,000 SCFH.

(c) Accessibility and maintenance. Manual service line shut-off valves for any new or replaced service line **must be installed in such a way as to allow accessibility during emergencies.**

Manual service shut-off valves installed under this section are subject to regular scheduled maintenance, as documented by the operator and consistent with the valve manufacturer's specification.

[Amdt. 192-121, 81 FR 71002, Oct. 14, 2016] [Emphasis added.]

The Commission's Bureau of Investigation and Enforcement must understand the Commission's regulation on safety 52Pa Code § 59.33. Safety.

§ 59.33. Safety.

(a) Responsibility. **Each public utility shall at all times use every reasonable effort to properly warn and protect the public from danger, and shall exercise reasonable care to reduce the hazards** to which employees, customers and others may be subjected to by reason of its equipment and facilities.

That means avoiding – “single point (or source) of failure”, without a curb valve there is a single point of failure. In critical systems there is built-in redundancy. The Commission's and Columbia's experts and management should know that. Service lines without curb valves is a hazard – a deliberate hazard. Just as bad as disconnecting the emergency brake on a vehicle.

PUC and its Commission's Bureau of Investigation and Enforcement (I&E) by not understanding, complying with, and enforcing the Federal Safety Standards may have degraded the integrity and safety of Pennsylvania gas distribution systems.

Safety goes beyond theoretical or legal argument -- Some recent safety cases in point that occurred close to Culbertson's rental property and residence.

Case 1.

On September 29, 2022, at 1605 Memorial Way Columbia destroyed the gas service line, and the customer's service line, which was private real property.



This is 1605 Memorial Dr. Dormont, PA. It is speculated it may be being foreclosed by a lender. The real estate taxes are current. For some reason, it has been vacant probably for over a year – probably just 2 years. This property is right in the back of the Culbertson property at 1608 McFarland Road. This is a very nice property with a two-car garage. Zillow values this property at \$241,900. If it comes on the market, Culbertson may try to purchase it.

This property has no visible curb valve installed by Columbia. Any knowledgeable investor in the area knows when this property goes on the market it will sell rapidly and sell for a significant amount. Certainly, there will be the future need and use of gas service on this real property – including the appurtenance, of the customer's service line.



Columbia dug up the street and cut the service line to the home.

Columbia did not install a curb valve, so when Columbia severed the service line, they also destroyed the customer's service line. If Columbia had a curb valve and if the curb valve were closed, the customer's service lines would not have been destroyed.



From a perspective of an interested buyer, they may conclude gas service should be available – the electricity is still on. Columbia removed their meter but did not remove their meter hanger and locking pin on the riser valve, circled in red. The riser is part of the customer’s service line. The locking pin prevents the testing of the customer’s service line by the owner or interested buyer. From the style of the riser, this is a fairly new plastic customer service line and had many years of service life remaining.

When Columbia did this, it violated PUC regulation *52 Pa. Code § 59.36. Abandonment of inactive **service lines**. [Not customer’s service lines.] (2) Service lines which have been inactive for 3 months and for which there is a reasonable prospect of future use shall be shut off [not abandoned] ... A review of the status of inactive lines shall be made annually, at periods not exceeding 15 months. Lines which no longer qualify for retention shall be abandoned under paragraph (1). (and for which there is no prospect of reuse shall be scheduled for abandonment under 49 CFR 192.727)*

When Columbia abandons service lines inappropriately, it harms the value of the property to the current and a prospective buyer -- but also the municipality, county, school, and state taxes that are determined proportionately to sales prices and income. Ultimately the cost to sever the service line and replace these lines should be deemed unallowable cost – as the work was not necessary and reasonable.

Case 2.

On October 19, 2022, (based upon the media, personal observations, and a discussion with a contractor employee) a contractor while installing fiber optic cable on Bower Hill Road, Mt Lebanon, PA drilled, with about a 6” bit, into a Columbia Gas 8” low-pressure gas main line.

See the media report and video from WPXI TV. <https://www.wpxi.com/news/local/contractors-hit-major-gas-line-work-site-near-st-clair-hospital-busy-road-shut-down/QGCM662GFRFYRIXB7TCLZ7NMTY/>

An accident or error caused a **major leak to the plastic main** that was or could not be shut off for **about six hours**. The location of this occurrence was the opposite side of the road of the Emergency entrance to St. Clair Hospital, the largest hospital in the south hills of Pittsburgh. Bower Hill Road in front of the Hospital was closed for 8 to 10 hours. For some reason, Columbia was not or did not use a valve to shut off the gas in this emergency. Columbia instead, to conduct the repairs, had to dig with heavy equipment in the opposite side of the four-lane highway and dig down to the main and pinch off the plastic line – like one would do with a plastic water hose to stop the flow of water.

It appeared Columbia's options and capabilities in an emergency in this case were low. Poor emergency avoidance and response. This incident must be investigated and evaluated as to how Columbia responded. Determine if Columbia violated the safety standards or its procedures. Also, what was the root cause of the incident?

Six hours to stop the leak? Was it a lack of care to prevent or capability to stop the major leak? The public must be better protected. The time required to control the flow gas was too long. The amount of gas that escaped was probably larger than the amount saved in a year through the efforts to find small leaks in their system.

It is unknown how much this emergency and repair incident may have impeded the free access to the emergency room entrance.

Conclusion:

The Commission must not defer determinations or dismiss important safety matters that can harm people and property until Columbia's rate case is determined in a couple of months. The conclusion of Columbia's rate case may not even address the safety issue regarding curb valves.

The testimony and positions of the Pennsylvania Public Utilities Commission's Bureau of Investigation and Enforcement are alarmingly wrong, and it appears their understanding of curb valve safety requirements has been wrong for a long time. This misunderstanding may have caused a lack of safety enforcement, which can make the safety of the distribution systems less safe. The Commission must understand the extent of competence and reliability of I&E and force necessary corrections and improvement.

A rate case does not stop the Commission from taking appropriate action under its responsibilities and jurisdiction – including what is going on with its Bureau of Inspection and Enforcement and with the rate case proceeding that put the public at risk. All of this leads back to the lack of internal controls of the Commission – and that must stop.

The Public Utility Code, *“Title 66 § 308.2., requires the Commission to 6) Insure adequate maintenance, safety, and reliability of utility networks.”* This would include the use of curb valves connected to service lines.

Under 49 CFR 195.55, the lack of necessary curb valves may constitute a reportable condition.

Keeping the public and customers safe from unsafe conditions of a public utility that may harm people and things is one of the most important functions of the Pennsylvania Public Utility Commission. The Commission must keep public utilities honest, but it must also keep itself honest, by having effective internal controls, a competent workforce, avoiding wrongdoing, and doing good.

Exposing the lack of understanding on the required installation of curb valves raises concerns on other fundamental operational required knowledge. Processes and infrastructure – to satisfy these concerns, independent auditors and inspectors must be engaged to provide the public some assurance that Columbia’s distribution is safe.

The Commission is requested to address and ameliorate these shown and explained safety threats as required and expected from the public.

The Commission should find it necessary to review the deficiencies found and promises made by NiSource to Pennsylvania as a result of the NiSource Deferred Prosecution Agreement coming out of the occurrence in the Merrimack Valley, MA on September 13, 2018. See Appendix A.

Respectfully submitted,



Richard C. Culbertson, Pro Se

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October 24, 2022

Appendix A.

NiSource Deferred Prosecution Agreement

Columbia Gas/ NiSource are of particular concern. NiSource is still under three-year probation with a Deferred Prosecution Agreement with the U.S. Justice Department.

<https://www.justice.gov/usao-ma/page/file/1252061/download>

NISOURCE'S OBLIGATIONS

11. NiSource also agrees, as to each of its subsidiaries involved in the distribution of gas through pipeline facilities in Massachusetts, Indiana, Ohio, Pennsylvania, Maryland, Kentucky, and Virginia to implement and adhere to each of the recommendations from the National Transportation Safety Board (“NTSB”) related to NTSB Accident ID PLD18MR003 regarding the Event.

Completed Investigation – Gas explosions and fire

Merrimack Valley, MA

<https://www.nts.gov/investigations/Pages/pld18mr003.aspx>

Recommendations

- **P-18-005 TO THE COMMONWEALTH OF MASSACHUSETTS**
- **P-18-006 TO NISOURCE:** Revise the engineering plan and constructability review process across all of your subsidiaries to ensure that all applicable departments review construction documents for accuracy, completeness, and correctness, and that the documents or plans be sealed by a professional engineer prior to commencing work. (Urgent) (Did that occur in Pennsylvania with Columbia Gas—what are the engineers doing with curb valves?)
- **P-18-007 TO NISOURCE:** **Review and ensure that all records and documentation of your natural gas systems are traceable, reliable, and complete.** (Urgent)
- **P-18-008 TO NISOURCE:** Apply management of change process to all changes to adequately identify system threats that could result in a common mode failure.
- **P-18-009 TO NISOURCE:** Develop and implement control procedures during modifications to gas mains to mitigate the risks identified during management of change operations. Gas main pressures should be continually monitored during these

modifications and assets should be placed at critical locations to immediately shut down the system if abnormal operations are detected

- [P-19-014](#) TO THE PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION: Revise Title 49 Code of Federal Regulations Part 192 to require overpressure protection for low-pressure natural gas distribution systems that cannot be defeated by a single operator error or equipment failure. <https://www.nts.gov/safety/safety-recs/recletters/P-19-014-018.pdf>
- [P-19-015](#)
- [P-19-016](#) Commonwealth of Pennsylvania - Open - Await Response

From NTSB

To Commonwealth of Pennsylvania

Date 02/12/2021

Type Official Correspondence

Response We normally expect actions to address our recommendations to be completed within 3 to 5 years. **It has now been over a year since this recommendation was issued, and we have not received any additional information regarding your state's actions to implement it.** We would appreciate receiving a response from you within 90 days regarding actions that Pennsylvania has completed or planned in response to this recommendation. Pending our receipt of an update, Safety Recommendation P-19-16 remains classified OPEN– AWAIT RESPONSE.

- [P-19-017](#)
- [P-19-018](#) TO NISOURCE, INC.: Review your protocols and training for responding to large-scale emergency events, including providing timely information to emergency responders, appropriately assigning NiSource emergency response duties, performing multi-jurisdictional training exercises, and participating cooperatively with municipal emergency management agencies.

Related Reports

- [PSR-18-02](#)
- [PAR-19-02](#)

Recommendation: The PA PUC should engage an external independent expert(s) to determine if Columbia has satisfied the requirements of the Deferred Prosecution Agreement.

CERTIFICATE OF SERVICE

Re: Pennsylvania Public Utility Commission :
:
v. : Docket No. R-2022-3031211
:
Columbia Gas of Pennsylvania, Inc.

I hereby certify that I have this day served a true copy of my Motion to the Commission to Expedite Determinations Regarding the Pipeline Safety and provided to a party of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below: Dated this 24th day of October 2022.



Richard C. Culbertson

I. SERVICE BY E-MAIL ONLY

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