

Chairwoman Gladys Brown Dutrieulle
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Third Floor
Harrisburg, PA 17120
Public Comment on Proposed Rulemaking Regarding Hazardous Liquid Public Utility Safety Standards (Docket L-2019-3010267)

Dear Chairwoman Brown Dutrieulle,

Thank you and the commission for soliciting public comment on new safety rules for hazardous liquid pipelines. This is a critical step in allowing the public to express concerns and have their input considered.

Please consider mine in your decision making process.

Pipeline Conversions-

Pipeline conversions can create an array of problems for the health and safety of Pennsylvanians. Under the current under-regulated process in place in Pennsylvania, abuse of eminent domain has occurred. Specifically, when Mariner East 1 was converted suddenly and without warning my home was in a "buffer zone" or a "blast zone". When I purchased my home I did, and do not, own an easement. Yet, because my home is approximately 450 feet from my dwelling I am now subjected to risk the PUC has identified as "having the potential for mass destruction". I did not accept this risk and was not compensated financially for it. Unfortunately, because the nature of this pipeline there is now over 8,000 people, just in the township of Uwchlan, located in Chester County that find themselves under the same involuntary risks.

Early Warning and Early Detection-

Mariner East's contents has no odorant, is colorless and is heavier than air. This is a dangerous proposition for high consequence areas. When Mariner East was proposed no state agency set out to decide if this was an appropriate risk for the Commonwealth, and if, the high consequence area of Chester County was equipped to responsibly comply with Title 35 Health and Safety statute. Municipal and County governments are not experts in NGL's or pipeline preparedness and mitigation. Municipal and County Emergency responders are not experts in hazard planning for this kind of threat. The EMS teams are mostly volunteers and the programs supporting their efforts are underfunded. The good tax payers should not "foot this bill" to prepare for the first 30 mins of a pipeline emergency. The good fire and police officers should be prepared under the Community and Worker Right to Know Act, not made to sign nondisclosures. Essentially tying their hands from protecting the domestic tranquility from

enemies both foreign and domestic. Should the worse case scenario occur near homes, schools and other places of public assembly without proper planning and public awareness we could be risking a catastrophe. FEMA documents indicate that disasters that have losses of 100-1000 lives could rack of bills in the range of 1 billion dollars. Without responsible action from PEMA that include a hazard and environmental risk assessment how can the state of PA comply with public protections? Who will ensure responsible planning is taking place? Federal codes to exist for the enforcement of proper pipeline siting, however, relief and enforcement can only be done after conversion, construction and planned haphazard routes. This process now is not only unfair to the public but also the industry who will continue to face opposition to their infrastructure around our homes and schools.

PUC Complaint process-

The process in place for complaints is cumbersome and out of reach for most Pennsylvanians. To get relief, hard working Pennsylvanians, must suddenly become lawyers. As a Pro Se Complainant it took me the better part of 2 months to write my complaint. Two additional months of writing and responding to answers. My filing resulted in over 100 pages of arguments. Once filed Energy Transfer hired 7 lawyers and subsequently tried, unsuccessfully, to get the Judge assigned the case to make me pay for their time. I am a stay at home mother to a middle class family, the costs for 7 lawyers would have ruined my family financially. The move was tactical; meant to bully and intimidate. My complaint is now moving forward to a full hearing. Energy Transfer's lawyers have not given me access to information I need to prove my case even though I signed confidentiality agreements causing me extreme prejudice. The process to compel access to the system is that I now need to file more motions that I have not had the time in over a month now to perform. Again, I don't have a team of employees or even a law degree to perform these tasks. The process to read and understand the law, find applicable law, file motions, perform discovery, attend phone conferences is completely overwhelming for the lay person. Even talking to opposing counsel who is immersed and educated in the field of law requires a lay person to essentially "translate" conversations into lay speech for prehearing conferences. There is no time to read, re-read, digest and then after careful deliberation respond in writing. It is all happening, very fast and with people opposing you who have a considerable edge. As we enter the phase of this process for a hearing I fear the courtroom practice and procedures process. ET counsel constantly reminds me, and the court, that I took on the process with full knowledge of the requirements. I vehemently disagree. Having spent NO time in court, having not attended law school, I have, and still have no concept of how to proceed and continue to just "wing it". I liken the process to floating in the ocean with my head just above water and 7 people adding Plastic Water Bottles, like those created by the materials in this pipeline, filled with sand to my feet. One, after another, after another, after another.

-Pipeline Siting

The state of Pennsylvania needs to take a hard look at their ability to keep Pennsylvanians safe. There is responsible industry, and infrastructure, and then there are those corporations that will use their immense bargaining power to take advantage of our Commonwealth and its citizens. They will use their relationships, money and power to create haphazard infrastructure in the most cost effective and convenient of routes. They will lie, downplay, and obfuscate actual risks from first responders, government officials and government agencies. The PUC must step in and hold the line between chaos and order. Please balance the public's needs for safe and reliable service with the agenda of profiteering; on the backs of our great Commonwealth and its citizenry, of utilities.

Truly Yours,

A handwritten signature in black ink, appearing to read "Rebecca Britton".

Rebecca Britton

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