

July 29, 2019

**Via Electronic Filing**

Rosemary Chiavetta, Esquire  
Secretary  
PA Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Re: Docket No. L-2019-3010270**  
**NOPR : 52 Pa. Code Chapter 73**  
**Comments of The County Of Chester**

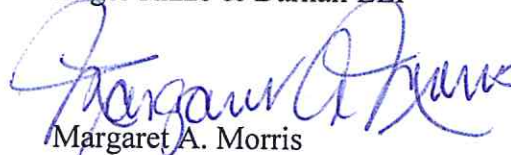
Dear Secretary Chiavetta:

Attached for filing, is The County of Chester's Comments to the Notice of Proposed Rulemaking Order Regarding Depreciation Reporting and Capital Planning for Crude Oil, Gasoline, Petroleum Products Transportation Pipelines, 52 Pa. Code Chapter 73.

If there are any questions, please do not hesitate to contact me.

Very truly yours,

Reger Rizzo & Darnall LLP



Margaret A. Morris

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cc: Darren Gill, Bureau of Technical utility Services [w/enc]  
Colin W. Scott, Law Bureau [w/enc.]  
Thomas L. Whiteman, Esquire, Chester County Solicitor's Office [w/enc.]

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Rulemaking Regarding Depreciation :  
Reporting and Capital Planning for :  
Crude Oil, Gasoline, or Petroleum Products : Docket No. L-2019-3010270  
Transportation Pipelines :  
52 Pa. Code Chapter 73 :

**THE COUNTY OF CHESTER'S COMMENTS TO THE  
NOTICE OF PROPOSED RULEMAKING ORDER**

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Date: July 29, 2019

*Counsel for The County of Chester*

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Rulemaking Regarding Depreciation	:	
Reporting and Capital Planning for	:	
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Transportation Pipelines	:	
52 Pa. Code Chapter 73	:	

**THE COUNTY OF CHESTER’S COMMENTS TO THE  
NOTICE OF PROPOSED RULEMAKING ORDER**

On June 13, 2019, the Pennsylvania Public Utility Commission (Commission) entered the Notice of Proposed Rulemaking Order (NOPR) seeking comments from interested persons regarding proposed amendments to the annual depreciation reporting, service life sturdy reporting and capital investment reporting regulations at Chapter 73 of its Regulations.<sup>1</sup> Chapter 73 currently applies to electric service, gas service and water service public utilities. The NOPR would require crude oil, gasoline and petroleum products transportation pipeline public utilities to file annual depreciation reports, service life study reports and capital investment plan reports.

The County of Chester (Chester County) supports the proposed regulations which will increase pipeline operation transparency and will help to ensure that crude oil, gasoline and petroleum products transportation pipeline public utilities are financially fit to complete the needed short and long-term maintenance for these public utilities to continue to operate safely throughout the Commonwealth. There is no valid reason to exclude crude oil, gasoline and petroleum products transportation pipeline public utilities from the mandatory reporting requirement for other regulated public utilities.

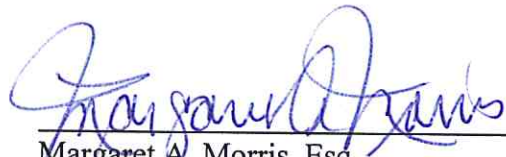
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<sup>1</sup> 52 Pa. Code § 73.1 *et seq.*

Chester County thanks the Commission for the opportunity to file comments on these important issues and believes the Commission has taken an important step in the right direction in amending the regulations set forth in Chapter 73. Chester County looks forward to working cooperatively with the Commission and interested stakeholders to achieve this common goal.

Respectfully submitted,

Date: July 29, 2019



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