



PENNSYLVANIA ENERGY INFRASTRUCTURE ALLIANCE

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August 27, 2019

Secretary Bureau
Pennsylvania Public Utility Commission
Commonwealth Keystone Building - 2nd Floor
400 North Street
Harrisburg PA 17120

L-2019-3010267

re.: Advance Notice of Proposed Rulemaking Order (ANOPR) and Notice of Proposed Rulemaking (NOPR)

To Whom It May Concern:

Pennsylvania has emerged as one of the country's leading energy producers and suppliers. Since 2013, the commonwealth has surpassed five states to become the United States' second-largest producer of natural gas, which has had a tremendous impact on the state's economy and local communities.

The oil and natural gas industry now supports more than 322,000 jobs in Pennsylvania and more than \$44 million in economic activity. In 2017, the median income with one of the state's top producers exceeded \$113,000 --- nearly double the state's overall median.

Pennsylvania's shale success owes itself largely to pipeline construction, which provides the safest and most reliable mode of energy transportation. The need for midstream infrastructure has helped the industry grow in recent years by more than 150 percent, and that is responsible for more than 21,000 jobs, so the variety of product produced here can be safely and reliably brought to market.

Our coalition, the Pennsylvania Energy Infrastructure Alliance (PEIA), represents a number of labor, materials, and business groups in the commonwealth that rely on energy infrastructure projects for employment. With the resurgence of shale production in western Pennsylvania and accompanying infrastructure projects and critical energy assets in the eastern portion of the state, thousands of lives have been improved.

The proposal to "more comprehensively" regulate Pennsylvania's energy pipeline developers threatens to reverse that hard-earned growth. The energy industry, specifically midstream, already has tremendous oversight and regulation through federal and state entities. These

regulations trickle down to the hands-on aspect. Union workers, which account for a large portion of the employees on these jobs and as members of PEIA, are required to routinely test, revise and refresh their safety skillsets to maximize their own safety and the quality of the projects they undertake.

Developers and unions have a vested interest in ensuring public safety, protecting local lands and water, and in the successful construction and operations of each project. Many pipelines, including Mariner East, not only meet regulatory standards, but voluntarily go above and beyond what is required. Regulators must remember that we share the commonwealth and its communities as our homes, too.

The Mariner East project employs the latest technologies to ensure the long-term safety of the project. The line utilizes internal monitoring systems, automated controls and shutoff capabilities, smart pig inspections and new construction techniques --- like specialized coatings to prevent erosion and X-rayed welds --- and materials that exceed industry standards.

Energy Transfer, the company developing the pipeline, has been proactive in consulting stakeholders to account for on-the-ground and ecological sensitivities. It has provided comprehensive trainings to local personnel to minimize the likelihood risks and implement response protocols in the event of an incident.

As production in Pennsylvania continues to grow the state must be able to swiftly develop the proper infrastructure to utilize the many resources available. Piling on additional regulation will only overburden the industry and workers unnecessarily.

As a representative of the workers and industry, and for the well-being of commonwealth, the Pennsylvania Energy Infrastructure Alliance kindly asks that the PUC considers the reality that our state already has adequate regulations for the pipeline industry to ensure the public's safety. Pipelines are the safest means to transport energy resources; implementing unnecessary regulations will only discourage pipeline infrastructure development, subjecting communities to increased rail and truck transport, which could have adverse impacts on community safety.

SINCERELY,



Kurt Knaus

Pennsylvania Energy Infrastructure Alliance

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