

**PENNSYLVANIA PUBLIC UTILITY COMMISSION
HARRISBURG PENNSYLVANIA 17120**

**Rulemaking to Implement Act 120 of 2018
at 52 Pa. Code Chapters 65 and 66**

**Public Meeting held September 17, 2020
3019521-LAW
Docket No. L-2020-3019521**

STATEMENT OF VICE CHAIRMAN DAVID W. SWEET

Before the Commission is the Notice of Proposed Rulemaking to implement the provisions of Act 120 of 2018, which addresses the financial aspects of a utility's replacement of customer-owned lead service lines and damaged wastewater laterals. There is an extensive Annex A, which proposes specific language to facilitate this implementation.

The Notice of Proposed Rulemaking invites comments of interested entities regarding the proposed language. In addition, I ask that those filing comments respond to the following questions:

1. Does the NOPR adequately carry out the directives in the statute? If not, how should it be changed?
2. Should all water utilities be required to develop and file a lead service line replacement plan? If not, under what circumstances should a plan be required?
3. Does this NOPR conflict with Act 44 of 2017 that prevents the imposition of obligations upon municipal authorities regarding replacement of LSLs by municipal authorities?
4. Does the requirement that the filed plan include the location of customer refusals adequately protect customer information?
5. Does the NOPR grant the utilities and entities with preexisting LSLR activities the flexibility to continue replacing affected lines under already approved terms?
6. Does the NOPR adequately provide due process to both utility and customer?
7. Does the NOPR adequately provide information regarding the process to be used when a filed plan is contested?
8. Should this NOPR be streamlined, and if so, how?

I ask that these questions be included in the publication of the Notice of Proposed Rulemaking.

September 17, 2020
DATE



DAVID W. SWEET
VICE CHAIRMAN