

DOCKET # C-2020-3018966

Hearing Date: November 12, 2020

TateExhibit 18-1	Letter
TateExhibit 18-2	Letter
TateExhibit 18-3	Letter
TateExhibit 18-5	Letter
TateExhibit 18-6	Letter
TateExhibit 18-7	Letter
TateExhibit 18-9	Letter
TateExhibit 18-11	Letter
TateExhibit 18-12	Letter
TateExhibit 18-14	Letter
TateExhibit 18-16	Letter
TateExhibit 18-17	Letter
TateExhibit 18-18	Letter
TateExhibit 18-20	Letter
TateExhibit 18-21	Letter
Columbia Hearing Exhibit No. 12	Picture



July 7, 2020

Steven K. Haas
Administrative Law Judge
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

Re: PUC Hearing C-2020-3018966

Dear Judge Haas:


We are writing in reference to the formal complaint filed by Mr. Bryan Tate against Columbia Gas pertaining to the installation of external gas meters to the front of buildings located within York City's Historic District. The proposed project lies within the confines of our respective legislative districts and has the potential to negatively impact many property owners who we represent. There is tremendous interest and significant concern among the residents of our community regarding this project, as evidenced by the heavy volume of correspondence we continue to receive.

While we support Columbia Gas' capital improvement project within the City of York, we are requesting consideration be given to the location of gas meters on historic properties per PUC regulation 59.18(d)(1)(i)(A-D).

Owners of historic properties located in York City's Historic Districts are requesting the same PUC historic exception that was granted by UGI to Harrisburg City's Historic District. This exemption allowed historic homes to retain their old-world charm by only placing a regulator on the outside of the property, leaving gas meters to remain on the inside.

In closing, we are seeking the Public Utility Commission provide equity and fairness among all historic districts across the Commonwealth by providing property owners within the City of York the same options as the residents of the City of Harrisburg.

Sincerely,


Kristin Phillips-Hill
Senator, 28th District

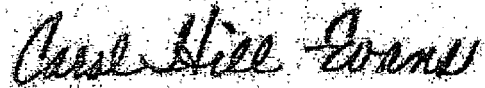

Carol Hill-Evans
Representative, 95th District

Exhibit 18-2

STANLEY E. SAYLOR

MAJORITY CHAIRMAN
APPROPRIATIONS COMMITTEE

245 MAIN CAPITOL BUILDING
PO BOX 202094
HARRISBURG, PA 17120-2094
PHONE: (717) 783-6426
FAX: (717) 783-7655

100 REDCO AVENUE
RED LION, PA 17356
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FAX: (717) 246-2387



House of Representatives
Commonwealth of Pennsylvania
Harrisburg

COMMITTEES
RULES

APPOINTMENTS
EDUCATION COMMISSION OF THE STATES

CAUCUSES
FIREFIGHTER AND EMERGENCY SERVICES
LEGISLATIVE SPORTSMEN
SECOND AMBNDMENT
ARTS AND CULTURE

E-Mail: ssaylor@pahousegop.com
Website: www.repsaylor.com

July 7, 2020

Mr. Steven K. Haas
Administrative Law Judge
Public Utility Commission
400 North Street
Harrisburg, PA 17120

RE: PUC Hearing C-2020-3018966

Dear Judge Haas:

I write to offer my support of Bryan Tate in his formal complaint against Columbia Gas of Pennsylvania regarding the relocation of his gas meter to the front of his property. I ask the PUC to support the historic exception to 052 PA Code § 59.18 (Meter, regulator and service line location).

According to Section (d)(1)(ii) of the Code, inside meter locations shall be considered only when a meter is located in a building that is listed in the National Register of Historic Places or is located within a historic district that is listed in the National Register of Historic Places. Mr. Tate's property is located in York City's Downtown East neighborhood, which is part of the York Historic District, as designated by the Pennsylvania Historical & Museum Commission on August 19, 1979, and entered into the National Register of Historic Places on that date. Therefore, all the buildings located within the York Historic District are eligible for historic exception from having meters placed in the front of the property.

Columbia Gas asserts that gas meters must be moved outside for safety as the pressure is being increased in the new gas lines serving York City. Workable solutions for the York Historic District would include moving lines to the rear of properties and installing meters on the back of buildings, or installing only regulators on the outside of buildings, which would decrease gas pressure entering the building, and leaving meters inside the basement out of sight. One of York's greatest assets is its historic architecture. I urge the PUC to rule in Mr. Tate's favor and for Columbia Gas to place gas meters out of site in the historic district.

Sincerely,


STANLEY E. SAYLOR

GETTLE VAUGHN LAW LLC

13 EAST MARKET STREET
YORK, PENNSYLVANIA 17401

TELEPHONE (717) 854-4899
FAX (717) 848-1603

GREGORY E. GETTLE
JEFFREY A. GETTLE

GREGORY HAROLD GETTLE (OF COUNSEL)
GLENN C. VAUGHN (OF COUNSEL)

PETER M. VAUGHN
JEREMY D. WILLIAMS
DOUGLAS J. KOZAK

C-2020-3018966
11/12/20 Tate

Exhibit 18-3

June 22, 2020


PA Public Utility Commission
400 North Street
Harrisburg, PA 17105

RE: Bryan K. Tate vs. Columbia Gas PUC Hearing
C-2020-3018966

Dear Commissioners:

As you can see from the address on our letterhead, we operate a legal practice at 13 East Market Street in the City of York. Our property is located in the City of York historic district which is a historic district listed on the National Historic Register. We are opposed to the installation of external gas meters in the front of our property. We understand that Bryan K. Tate, an individual who owns a property on Pine Street in the City of York has filed a formal complaint against Columbia Gas in the case referenced above to force him to move gas meters to the external front of his property. We support Mr. Tate in his formal complaint against Columbia Gas and the opposition to the installation of gas meters in the front of properties on Pine Street and on East Market Street in the historic district of the City of York.

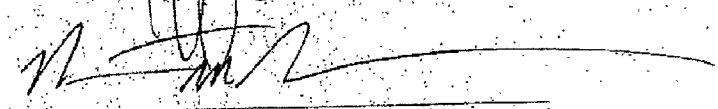
Very truly yours,



GREGORY E. GETTLE, ESQ.



JEFFREY A. GETTLE, ESQ.



PETER M. VAUGHN, ESQ.



JEREMY D. WILLIAMS, ESQ.

Exhibit 18-5

Alliance of Neighborhood Associations of York, PA

June 30, 2020

Steven K. Haas
Administrative Law Judge
PA Public Utility Commission
400 North Street
Harrisburg, PA 17120

Dear Judge Haas:

This letter is written in support of Bryan Tate for his complaint filed against Columbia Gas of Pennsylvania regarding issues with gas meter installations in the City of York, PA. The Alliance of Neighborhood Associations of York, PA, which represents 17 neighborhood associations in the City of York, objects to the front exterior placement of gas meters. We oppose front exterior placement for the following reasons:

The primary issue of exception is the violation of the spirit of the federal Americans with Disabilities Act. Front exterior meter installations disrupt pedestrian sidewalk travel by handicapped residents, particularly those in wheelchairs. Not all residents are capable of safely navigating around the new meters that have been placed in front of homes. Obstructed sidewalks have forced handicapped and other disabled residents to either forgo travel down a certain stretch of sidewalk or travel in the street.

The secondary issue of concern is the safety of front exterior gas meters. These meters can be easily vandalized and gas can be turned off with the simple turn of a wrench. In a dense, urban atmosphere, front exterior meters are too easily accessible for vandalism.

Our final issue of concern is regarding the PUC Regulation exception for properties listed in the York City Historic District, which is listed on the National Register of Historic Places. Front exterior meter installations are in violation of the York City Historic District unless a variance is received from York City Council after approval by the York City Historic Architectural Review Board. Not only do front exterior meters detract from time-period continuity of historic districts, but they violate ordinances supported by the National Register.

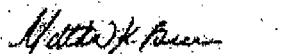
The Alliance of Neighborhood Associations of York, PA recommends that Columbia Gas of PA halt front exterior meter installations on properties in the York City Historic District, on properties in dense, urban parts of York City, and on those properties that will not be safely passable for a handicapped/disabled person. It is recommended to follow the process of installing only an external regulator with an internal meter.

Thank you for your attention to this matter.


Sincerely,
Alliance of Neighborhood Associations of York, PA


Peter Andrews, Chair

Peterandrews52@gmail.com


Matthew Brose, Co-Chair/Treasurer

mkbros@isloud.com


Ryan Supler, Secretary

rrsupler@gmail.com

Downtown East Neighborhood Association

July 5, 2020

Steven K. Haas
Administrative Law Judge
Public Utility Commission
Commonwealth of Pennsylvania
400 North Street
Harrisburg, PA 17120

Your Honor,

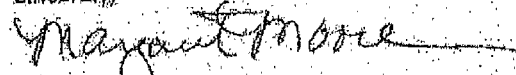
We write to you as the Co-Chairs of the Downtown East Neighborhood Association, the oldest neighborhood association in the City of York, PA. Downtown East organized more than 50 years ago to represent the interests of residents and businesses in the historic east side of York's downtown. Downtown East would like to go on record as being opposed to Columbia Gas relocating gas meters to the outside front of homes and businesses in the City of York, particularly in Downtown East, which is the heart of York's Historic District.

Downtown East is a densely concentrated urban neighborhood consisting of elaborate historic housing stock (including the home of Declaration of Independence signer Congressman James Smith and others), architecturally significant business structures (like York Water Company and others), and decades old workers houses representative of York's industrial boom. Much of our architecture was designed by noted architect J.A. Demppwolf or other architects in his York firm. We believe that our significant architecture must be preserved to maintain one of the assets that the City of York relies on -- its history.

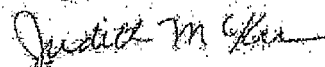
Property owners in Downtown East are required to apply to York's Historic Architecture Review Board when making alterations to the front exterior of their buildings. HARB reviews all modifications to ensure that standards are followed to ensure standards required by the York City Historic District, which was sanctioned by the National Register of Historic Places. Downtown East objects that Columbia Gas to date has not sought or received HARB or City Council approval for the placement of gas meters to the fronts of properties in Downtown East and the York City Historic District.

We object to Columbia Gas refusing to support the historic exception of the PUC Regulation regarding outdoor meter placement. Downtown East expects all gas meters to remain inside properties or be placed in the back of properties when being moved outside.

Sincerely,



Margaret Moore, Co-Chair



Judith McKee, Co-Chair

Downtown East Neighborhood Association

Olde Towne East Neighborhood Association

June 22, 2020

Public Utility Commission
Commonwealth of Pennsylvania
400 North Street
Harrisburg, PA 17120

Dear Commissioners:

Olde Towne East Neighborhood Association offers its support to Bryan Tate in his formal complaint against Columbia Gas of PA objecting to the placement of gas meters to the front of his property or to the fronts of any property in our neighborhood.

In 2009, the Olde Towne East Neighborhood was established by the residents served by the YWCA of York. Neighbors worked in partnership with the YWCA to support and sustain the major investment by the YWCA and funders of millions of dollars of work to the infrastructure and beautification of properties in our community. Olde Towne East and the YWCA worked closely with Columbia Gas to ensure that the major investments in stabilizing our community would not be reversed by relocating gas company equipment to building facades. And Columbia Gas, thankfully, agreed. But now Columbia Gas has reneged on that agreement.

Olde Towne East and the YWCA worked with the York City Historic Architectural Review Board and York City Council to ensure that all improvements met the letter of local ordinances regarding York's Historic District and the National Register of Historic Places. We are dismayed that Columbia Gas refuses to follow the PUC's historic exception in the regulations and at a minimum locate the meters inside and regulators outside. We are extremely disappointed that Columbia Gas refuses to recognize the National Register of Historic Places and the requirements in the York City Historic District.

Olde Towne East is also concerned that the placement of gas meters on the facades of homes and buildings puts all neighbors at risk as external gas meters can easily be tampered with or driven into and they may also restrict the flow of gas during deep snows that cover the meter; this potential is documented on the Columbia Gas website. In addition, meters in the front of properties with shallow sidewalks are impeding proper passage for our neighbors with disabilities violating the Americans with Disabilities Act.

In light of all of the reasons listed above, we ask you to please rule against Columbia Gas's placement of gas meters on the front of properties in Olde Towne East and in the City of York.

Thank you for your time. Please contact me if you need more information.

Sincerely,



Elsbeth Bupp, Secretary
Olde Towne East Neighborhood Association, City of York, PA



YORK COUNTY
HISTORY
= CENTER =

Exhibit 18-9

May 26, 2020

To Whom It May Concern:

At a recent York County History Center Board of Directors' meeting members voted unanimously to support Mr. Bryan Tate's effort to stop the unnecessary and unsightly installation of gas meters in front of downtown York's historic properties. In their decision board members emphasized the fact that these meters degrade the community's character and sense of place created by the National Register of Historic Places designation. As an organization devoted to history and tourism the meters steal the very aspect that makes our community a destination, historic architectural assets. It is deeply disturbing that Columbia Gas blithely ignores the PUC regulation allowing historic properties and districts an exception.

[REDACTED]

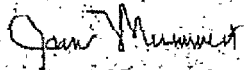
[REDACTED] Add to this the increased risk each meter presents with potential ice accumulation and tripping hazard.

Even more concerning is the location of these meters on main thoroughfares. In 2007 a car drove through one of our historic History Center buildings along Market Street and in 2009 my vehicle was totaled while parked in front of our administrative building also on Market Street. [REDACTED]

[REDACTED]

Painting the meters or creating plantings around them will not improve the risk or their appearance therefore we seek a more appropriate resolution for the safety, security and economic vitality of our community. There is an alternative solution using regulator pipes that we request Columbia Gas use for the remaining areas of downtown York. We respectfully ask for your support of our community.

Sincerely,


Joan J. Mummert
President & CEO



C-2020-3018966
11/12/20 Tate

Exhibit 18-11

Pennsylvania Public Utility Commission
Commonwealth of Pennsylvania
400 North Street
Harrisburg, PA 17120

May 28, 2020

Dear Commissioners:

As property owners in the historic district of the City of York and a company has spearheaded the investment of more than \$40 Million Dollars in the revitalization of the city and to preserve its beautiful historic buildings, we write in support of the position of Bryan Tate in his complaint before the Commission.

RSDC values the history of the buildings in our downtown and designs projects around preserving, restoring, and revitalizing those buildings. York's downtown has won numerous historic preservation awards, and collectively, local businesses have worked together in concert with our city's Historic Architecture Review Board to ensure that renovation and new construction work is compatible with York's rich architectural legacy. As a result, York has a distinctive and vibrant downtown that is proving instrumental in its work to revitalize the economy of the city.

The decision by Columbia Gas to ignore that effort and refuse to cooperate with the City of York and its homeowners is disappointing. The Royal Square District, one of our first revitalization projects, is one of the blocks that have been affected by the decisions of Columbia Gas.

We urge you to respect the very significant efforts and investment of thousands of businesses and homeowners in downtown York by supporting Mr. Tate, and extending that support to all other homeowners and businesses in the City of York.

Sincerely,

Joshua Hankey
JHankey@rsdcinc.com
CEO, RSDC

Exhibit 18-12

326 E Market Street
York, PA 17403

PA Public Utility Commission
400 North Street
Harrisburg, PA 17120

Dear Commissioners:

Let me take this opportunity to express my support of Bryan Tate's efforts regarding the thoughtless proliferation of gas meters in the City of York by Columbia Gas Company.

Several years ago when without any warning or notice external meters appeared along the unit block of West King Street, I and several other individuals met with representatives of Columbia Gas to express our dismay with the lack of consideration of the detrimental effects that these meters had on the appearance of our City and especially on our historic neighborhoods.

We explained that several of our downtown neighborhoods were listed on the National Register of Historic Places and that placing meters along the streetscape was against both national regulations and local ordinance. The response was basically we don't care. The Pennsylvania Public Utilities Commission says we can do it and we are.

The only concessions were that Columbia Gas would be more diligent in notifying residents, that they would install any new meters at the rear or side of the property when possible and would paint the meters to blend in with the building. A request that regulators be installed instead of meters was ignored.

For a brief period of time, the installation of street meters seemed to slow down, but recently there has been no stopping them. I am aware of conversations with the City of York, Historic York, several neighborhood associations, city property owners and downtown residents. All efforts have been met with a lack of support from the state as even more and more meters deface the historic streetscapes of our center city.

The downtown blocks of Market and George Streets are lined with one of the state's most outstanding collections of architecturally distinguished properties. In the fall, local residents were told there were no plans to install meters along East Market Street. Now I understand even this plan has been tossed to the side. I respectfully request that the installation of gas meters littering our sidewalk be terminated immediately.

In closing, when I arrived home in January 2020 after a holiday trip, I found my house at a cool forty degrees. With no phone call, no letter, no email or no posted notice, Columbia Gas had disconnected my gas line. This was inexcusable in that my bill was paid in full and the company had both my phone number and my email address. Of course, I called and complained, and the company did soon appear and restore my service. However, this is just another example of the lack of concern that Columbia Gas has for the local communities that must pay for their ever rising cost for service. I still await replacement of a section of concrete that was destroyed.

Sincerely

Joe Sefora

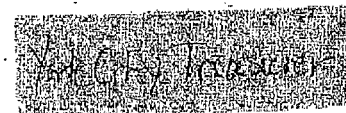


Exhibit 18-13

I am writing this letter in full support of Bryan Tate's formal complaint against Columbia Gas and their desired meter installation in the front of his property on Pine Street in York, PA.

I believe every homeowner should have the right to decide the placement of a gas meter on their own property and should not be directed where it must be installed. There needs to be an equality, or at the least a compromise, between the property owner's location preference and the gas company's cheapest installation costs. Additionally, I believe that many property owners are not consulted about meter placement, particularly absentee landlords. In this case, many tenants make the decision for their landlords by allowing Columbia Gas to install the meters where they see fit. This location appears to be the shortest distance from the street's gas main to the front of the building, rather than a more equitable place like the side, back, or other nonintrusive locations.

At our October 2018 Alliance of Neighborhood Association (ANA) meeting, I made a presentation based on my York Daily Record (YDR) editorial, "Ugly gas meters look like a colostomy bag for a house". The subject was on Columbia Gas's meter placement in our city. The ANA membership in attendance all agreed that the meters have become increasingly an eye-sore in our historic city of York.

Andrew Tubbs, Vice President, External and Customer Affairs, for Columbia Gas of PA and MD, wrote a response to my YDR editorial. He addressed my historic district concerns in stating that Columbia Gas works closely with the Historical Architectural Review Board (HARB) on every project located within the HARB district. At our York Town Hall meeting last year (2019), I asked Mr. Tubbs directly about this working relationship with HARB. He admitted that this does not occur, in other words, his article in part was not the truth. Can we trust a company to do what is best for its customers if it lies?

[REDACTED]

Governor Wolf's Restore Pennsylvania Initiative designed to battle blight in PA could not possibly approve of these outside meters. With every gas consuming business and residence being fitted with an outside meter, this only contributes to the urban blight in our beautiful city and state. Just look around and you will find up to six gas meters at the front door of a previously single-family home that now has six apartments. Columbia Gas boasts that they paint the meters to match the color of the building as an attempt to make them more appealing but that's just "putting lipstick on a pig"!

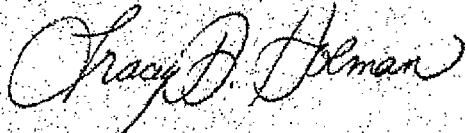
[REDACTED]

[REDACTED]

On July 31, 2019, Columbia Gas was barred from further work in North Franklin Township near Pittsburgh. When the new gas system was engaged, the elevated pressure led to a leak and a devastating explosion where the homeowner, a neighbor, and three firefighters were injured.

Every Pennsylvania city that has fought the issue of gas meter placement has met with stiff opposition from the gas companies. The companies continuously cite safety and PA PUC regulations/mandates for their actions. Now is the time for the PA PUC to rethink their codes, listen to the voice of the people, consider our opinions and concerns, and decide what's best for the safety of the citizens and the preservation of our beautiful state of Pennsylvania.

Thank you,



Tracey A. Holman

York City Resident

Downtown East Association member

Oldtown East Association member

ANA Representative

Ugly gas meters look like a colostomy bag for a house

You: Turn
Tracy Holman
Guest columnist

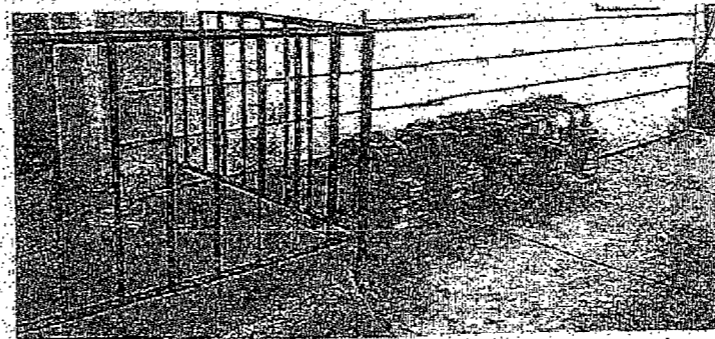
I am writing this letter with pent up anger and frustration over the gas meters that are being installed by Columbia Gas in front of homes and businesses in downtown York. Six months ago, when I saw the meter installation taking place on Newberry Street just north of Philadelphia Street, I thought surely there would be an outcry from residents in that area. Then I witnessed a similar massacre on Prospect Street and no outcry. Now King Street and Pine Street, and my anger is boiling over.

Why is this rape taking place in our

beautiful city? How is this being allowed to happen? Why are these hideous meters placed smack in front of homes? Will they be placed in front of all the businesses and homes in the city? Will they be placed in front of all the homes in all the neighborhoods around town, too? What are the rights of the homeowner? When did the utility companies get a free pass on remodeling our personal property? Where is the power and voice of our elected city officials?

At my first Alliance of Neighborhood Associations meeting our newly elected mayor was there to field questions and concerns from those of us in atten-

See METERS, Page 4D



These gas meters recently were installed on North Newberry Street in York. SUBMITTED

Meters

Continued from Page 1D

dance. When it was my turn to speak, I brought up my disappointment in the appearance of the new gas meters and the averaging of the streets and sidewalks. My answer back was "more or less" if he happened not on his watch. Surprisingly, he was the city council president before mayor. In defense of the mayor, another ANA member stated they believed the installation of the new meters addressed a safety issue wherein the gas company could easily turn off the gas should an emergency occur in such a circumstance. Amazingly, there

In May 2018, our City of York was listed by Reader's Digest as one of the top twenty Most Beautiful Main Streets in America. A top twenty city with beauty and history that is allowing gas meters to be placed in front of businesses, residences, and homes converted into apartments. Meters lined up side by side, sometimes four or more in front of one home. We should be ashamed!

Have you driven up Newberry Street where the new meters were installed? The street and sidewalk restorative job is reprehensible. Who is inspecting the finished project and what is the standard being used to approve this finished project? One year from now when the streets and sidewalks start to sink from this inadequate fix who will be responsible for the addi-

port HARB supporters?

In the past three years I have witnessed tremendous investment and revitalization in our beautiful downtown York. While individuals and corporations are diligently restoring homes and businesses, Columbia Gas is following behind destroying these efforts with jack hammers, backhoes, and exceedingly ugly gas meters. This Rape must stop!

Why as homeowners, businesses, and a city are we allowing this to happen? I need some answers, please. Tracy Holman lives in York City.

L E I D O N G E E R W I N U M P E W O W

New Columbia Gas meters are safe and efficient

Your Turn
Andrew Tubbs
Guest columnist

In response to "Ugly new gas meters in York look like a colostomy bag for a house" (opinion) by Tracey Holman:

The residents of York deserve to have efficient, reliable and, above all, safe natural gas delivery. Columbia Gas of Pennsylvania is committed to providing this service, as mandated by federal and state laws and regulations, as well as through the Company's strong safety practices.

As a public utility, Columbia Gas is regulated by the Pennsylvania Public Utility Commission (PA PUC). This means that Columbia Gas must comply with the PA PUC's regulations. The PA PUC's regulations require that gas meters and pressure regulators be located outside. An exception may be granted if we can readily confirm that the building is, or is eligible to be, listed on the national register of historic places, or is

closely with the Historical Architectural Review Board (HARB) Team on every project located within the HARB District.

Columbia Gas must also comply with its tariff, which is a set of rules that has been approved by the PA PUC. Columbia's tariff provides us with the sole discretion to determine the locations of its meters. A copy of our tariff in its entirety can be accessed through our website at www.ColumbiaGasPA.com.

Consistent with the core value of safety and federal and state laws, we must have ready access to its meter and other lines and equipment to ensure that the equipment is operating safely. An outdoor meter eliminates the risk of shut-off due to access issues, and provides first responders with easy access to your meter in an emergency. We work to find the safest area for outdoor meter placement as both a safety enhancement and a convenience for our customers.

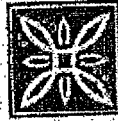
As a part of Columbia's comprehensive pipeline replacement program, the Company is replacing aging portions of its distribution system with state-of-the-

York. As a part of that work, we replace customers' service lines and gas meters at no direct cost to customers.

The general public needs to be informed about the work that we do in the community, and we try hard to provide customers with prior notice of service interruptions and possible traffic disruptions. We also work with local municipalities to coordinate construction schedules with other infrastructure projects, such as the upgrade of water lines and the replacement of local roads, to limit additional inconveniences to all residents in the York area. Due to weather and seasonal conditions beyond our control, full restoration of some properties may take time to complete, but please know that we will repair your property to its pre-construction condition as soon as we possibly can.

Any customer who might have a specific question regarding our service, our pipeline replacement projects or any property restoration may call 1-888-486-8823 for more information.

Andrew Tubbs is vice president, external and cus-



Downtown Inc
DowntownYorkPa.com

May 18, 2020

Pennsylvania Public Utility Commission
Commonwealth Keystone Building
2nd Floor, Room-N201

RE: Bryan Tate v. Columbia Gas PUC Hearing C-2020-3018966

Commissioners:

This letter is in support of Mr. Bryan Tate, a private property owner in the City of York, who has filed a formal complaint against Columbia Gas for issues related to the installation of gas meters in the city. Mr. Tate's hearing is scheduled for May 27.

Downtown Inc is a public-private partnership representing the City of York's business community and promoting investment in Downtown York. Our observation is that Columbia Gas's process for the installation of meters, communications with property owners, and diligence in adhering to historic designations and other protective measures have been significantly flawed. This has led to frustrated property owners and negative physical impact to our historic community. Columbia Gas's actions have undermined our community's collective impact to improve the look, feel, and safety of our community, and counteracted significant state investment in our city.

While the PUC Regulation provides for exceptions for historic properties and properties in federally designated historic districts [Section 59.18(d)(1)(ii)(A-D)], Columbia Gas is ignoring the historic exception, even in cases where property owners like Mr. Tate have requested the exception. Columbia Gas's suggested mitigation of planting bushes and painting meters have neither come to fruition, nor are the corrective actions on par with the impact of the installations. Further, repair work to sidewalks following work has not been consistent or high quality, resulting in public safety hazards and a significant detriment to the historic nature of Downtown York.

Exhibit 18-16

genevieve h. ray

urban conservation & design
101 raiford road
york, pa 17403
717-848-3320
genray@comcast.net

MEMORANDUM

TO: ADMINISTRATIVE LAW JUDGE, PA Public Utility Commission
ON: 20 May 2020
RE: PUC Hearing C-2020-3018966, Bryan Tate vs. Columbia Gas

This memorandum supports the complaint by Bryan Tate, owner of 52 S. Pine St. in downtown York, regarding Columbia Gas' insistence that gas meters be installed at the front facade of his property, a contributing structure in York's historic district listed in the National Register of Historic Places.

I write wearing several hats from a 40-year professional life focused on urban development and historic conservation, in roles ranging from private consultant to elected official, as notes at the bottom of this page indicate.

PRESERVATION IS AN ECONOMIC POWERHOUSE. NOW, DISTRICTS AND DETAILS MATTER

In older times - 80 or 90 years ago - "historic preservation" as a field did not exist. Appreciation was reserved for specific sites where "George Washington slept" or for ornate, high-style architectural gems - mansions of the rich and famous.

But by the mid-20th century, our understanding of what was important had grown to include whole cities and whole neighborhoods, where the setting itself contributed to the significance of the place. Our understanding of the sweep of American history grew to include groups of fine properties such as those found in Mr. Tate's neighborhood.

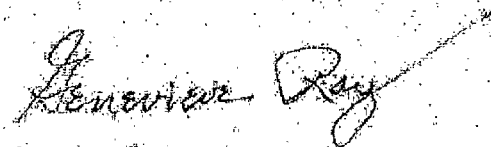
And by 2020, the economic powerhouse provided by well-preserved historic places has become a known factor in urban development. Country-wide, careful attention to the treatment of historic districts is now recognized as an economic driver in cities' revitalization - historic tourism being the fastest growing sector of the tourist industry. And now, skill and details matter. Careful attention is now paid to details of quality that underpin the integrity of historic properties.

COLUMBIA GAS' INTRANSIGENCE IS A STEP BACKWARD. EARLIER AGREEMENTS SHOULD STAND

Gas meters on the primary facades of York's historic buildings diminish the integrity of these properties. Columbia Gas' insistence on placement of these foreign and unsightly objects detracts from the value of our well-preserved structures, and impairs urban revitalization efforts that York's private and public actors are making all over downtown.

Finally, there is no reason for this stand-off. There is precedence for amicable solutions, and as Mr. Tate has pointed out, the current case is a step backward from agreements earlier hammered out in Harrisburg and elsewhere in York.

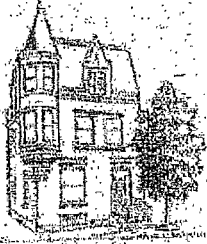
I urge the PUC - and Columbia Gas - to take a step forward.



Genevieve Ray

York, PA - City Council President, 2009-2011
York, PA - City Planning Commission Chair, then City Council member, 2005-2011
City of Cincinnati, OH - Urban Conservator, primary staff person to the city's Historic Conservation Board, 1981-1987
City of Cleveland, OH - Executive Director of the non-profit riverfront development district, Flats Oxbow Assn. 1987-1990
Cambridge, MA - Loeb Fellow, Harvard University Graduate School of Design 1978-79

Exhibit 18-17



KATHERMAN & PERRY

ATTORNEYS AT LAW
345 EAST MARKET STREET
YORK, PENNSYLVANIA 17403
(717) 854-6124
FAX 843-2690

J. ROBERT KATHERMAN
RONALD PERRY
STACEY R. MAONEAL
JAYNE B. KATHERMAN

June 12, 2020

PA Public Utility Commission
400 North Street
Harrisburg, PA 17105

RE: External Gas Meters

Dear Commissioners:

I am the owner of 345 East Market Street in the City of York, Pennsylvania. Our building is a magnificent brownstone which has the distinction of being included on the National Historic Trust. The 300 block of East Market Street has many such fine structures. Strong zoning enforcement and the Historical Architectural Review Board have preserved this neighborhood. Sometimes this rigid enforcement has been costly and frustrating, but there is no question it has been a bulwark against crass commercialization and disparate land uses.

It was with horror and outrage that I heard that Columbia Gas wants to place their large and unsightly gas meters on the front sidewalks of our properties. This despite the previous assurances from Columbia Gas that they would not so desecrate our homes and offices.

If I would ever be so foolish as to try to place some mechanical fixture on the ground level external front of my building, multiple municipal agencies would prevent me from doing so. They would state that the rules and regulations are in place to maintain the historic, architectural, and aesthetic integrity of the neighborhood.

So, why in the world would Columbia Gas be allowed to violate these same historic, architectural, and aesthetic standards just to increase its profits?

The City of York struggles to maintain its once magnificent neighborhoods. Please do not allow Columbia Gas to drive one more stake into the heart of those efforts. Please, just say no!

Very truly yours,
KATHERMAN & PERRY

J. Robert Katherman

JRK/lls

Stock and Leader

ATTORNEYS AT LAW

When Decisions Matter

BUSINESS • GOVERNMENT • PERSONAL

June 9, 2020

Ronald L. Herzner, Esquire
Direct Dial: (717) 849-1133
rherzner@stockandleader.com

Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17105

Re: Gas meters on East Market Street, York

Dear Commissioners:

I am the Managing Partner of Stock and Leader, LLP a law firm in York Pennsylvania, but I write this letter in a personal, not a professional capacity.

For nearly 13 years I lived on East Market Street in York, first at 373 East Market and then at 377 East Market. The two homes I owned and in which I resided were among the many beautiful and historic homes in what is known as the Downtown East neighborhood. My first home at 373 is a carefully restored colonial style residence built around the original (perhaps 200 year old) log house that was likely one of the first homes in that section of the City. The second at 377 is a magnificent and stately Federal/Georgian style mid-19th century residence that is one of the finest private homes in the city. The second and third blocks of East Market Street are blessed with some of the most attractive and historically significant homes in the City of York. Most have been carefully restored and renovated. If properly maintained and protected into the future these blocks can rival any of the historic neighborhoods of Annapolis, Maryland, Alexandria, Virginia, or Georgetown, DC. So I shudder when I learn that the beautiful and historic street scape might be marred by the relocation of gas meters to the front of these dwellings.

This might seem like a small matter to someone who does not appreciate the importance of preservation of an historic environment. Yet one of the comments I so often hear from out of town visitors is an appreciation of the architectural beauty of York's downtown. So many other cities of a similar size have lost the character of the historic housing stock and attractive street scape. To maintain an attractive and desirable urban residential environment it is important to

June 9, 2020

Page 2

have not only quality housing stock, but also a well-maintained and attractive street scape. When that residential environment is also historic and architecturally significant it is vital to preserve not only the fine structures but also preserve an aesthetically pleasing street scape.

I urge you to deny the request to relocate gas meters to the street side of these properties. The relocation of meters would harm the historic, aesthetic, and architectural value of these properties and would diminish one of the great attributes of the City of York.

Very truly yours,

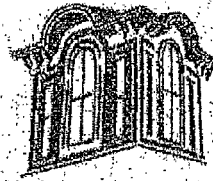


Ronald L. Hershner

RLH/glb

cc: Mr. Bryan Tate
Niles Benn, Esquire

Exhibit 18-20



HISTORIC YORK
Building the Future with Architecture of the Past



June 1, 2020

Mr. Steven K. Haas
Administrative Law Judge
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

RE: Bryan Tate vs. Columbia Gas PUC Hearing C-2020-3018966

Dear Judge Haas:

I write to you in support of Bryan Tate and his formal complaint against Columbia Gas of PA regarding the placement of gas meters on the external front of his property and other properties in York City's Historic District. Historic York asks the PA Public Utility Commission to honor the historic exception of the PA Code regulating gas meter placement.

Over the years, York has seen too many significant buildings altered beyond recognition due to neglect. Many times, simple measures could have saved the historic integrity of each of these properties – like a more attentive owner, or public awareness, or partner corporate utilities – and could have saved York's architectural heritage. This is why the Pennsylvania Historical & Museum Commission placed the York Historic District on the National Register of Historic Places – to protect York's historic structures from exterior alteration and desecration.

Historic York welcomes the opportunity to partner with utilities to improve and modernize services while also honoring state and federal protections for historic integrity of buildings in recognized historic districts. However, Columbia Gas has not sought partnership with any local government, permitting, neighborhood, historic organization, or residents, to produce workable solutions to avoid installing gas meters in front of properties in York's Historic District.

Therefore, we cannot sit by while Columbia Gas continues to destroy York's Historic District – York's architectural gems – York City's greatest assets. We ask the PUC to uphold the historic exception of the PA Code regulating gas meter placement.

Sincerely,

Matt Gallagher
Board President

25 North Duke Street Suite 303
York, Pennsylvania 17401



Pennsylvania State Historic Preservation Office
PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

July 21, 2020

Steven K. Haas
Administrative Law Judge
PA Public Utilities Commission
400 North Street
Harrisburg PA 17120

RE: Bryan Tate v. Columbia Gas
PUC Hearing C-2020-3018966

Dear Mr. Haas:

The State Historic Preservation Office (SHPO) was contacted recently about the above complaint. We commented on the draft Amendment to 52 Pa. Code Sec. 59.18 regarding meter location and suggested some revisions on the provisions related to historic buildings. The City of York is one community that has long worked to preserve its historic character. In 1970 the City passed an ordinance to designate the downtown area as a local historic district under the 1961 Pennsylvania Historic District Act, and an even larger area was listed in the National Register of Historic Places in 1979. The boundaries of both the National Register and local historic districts are available online to the public on our agency's Cultural Resources Geographic Information System, and the local district also appears on the City of York's zoning map. In the SHPO's opinion, there is no question that Columbia Gas should have been able to verify that Mr. Tate's property meets the criteria to be considered for an inside meter location, as specified in Section 59.18 (d)(1)(ii).

The intent of this provision in the regulation was to recognize the significant character of these historic districts and give communities an opportunity to consult with their local gas supplier as a strategy for preserving the architectural integrity of their historic buildings. We fully support this approach and further recommend that, before starting these relocation projects, gas companies reach out to property owners and to the municipality's Historic Architectural Review Board to outline parameters or design guidelines for choosing an appropriate place for the gas meter and regulator. This would allow residents and gas companies alike to rely on a predictable and consistent process that would improve the safety of the gas supply network, as well as maintaining and preserving the architectural character of these historic districts

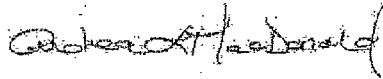
[REDACTED]

In stark contrast, Columbia Gas seems to be treating all properties without regard to their historic designation, and even when property owners request an inside location under the provisions of 59.18, few, if any, exceptions are approved.

The PA Historical and Museum Commission's State Historic Preservation Office urges PUC to carefully consider Mr. Tate's complaint and direct Columbia Gas to negotiate in good faith with historic property owners, as provided in the current regulations.

Please feel free to contact our office if you need any additional information about Pennsylvania's historic districts or sensitive meter locations.

Sincerely,

A handwritten signature in cursive script, appearing to read "Andrea L. MacDonald".

Andrea L. MacDonald,
Director and Deputy State Historic Preservation Officer
Pennsylvania State Historic Preservation Office

**City of York
Historical Architecture Board of Review (HARB)**

101 S. George Street York, PA 17403

Hello,

I write on behalf of the appellant, Bryan Tate. I serve as the Chair of the York City Historic Architectural Review Board (HARB). We have heard numerous appeals and complaints from residents of our historic district who have attempted without success to stop the installations of new gas meters at the front of their historic houses. We have had encouraging conversations with a representative of the gas company who indicated a current window of opportunity for strong representations of the district and the owners who seek relief from the installation of gas meters at the front of these historic homes.

Mr. Tate's home is in exceptionally fine condition and is highly representative of this housing type from it's time of construction. The York City Historic Architectural Review Board has strongly encouraged alternative placement of new gas metering systems so as to preserve the street facing view of all historic homes in the district. We believe this house to be a stellar example of a 19th Century Home. We would strongly encourage Columbia Gas to look for alternative locations of a new meter system that would not obstruct or otherwise malign the street face view of this important property in the district.

We urge the PUC to seriously consider the esthetic value of such conscientiously maintained historic properties in the community and urge that Columbia Gas find alternative sites for metering and preserve the facing street view of this fine Pine Street house that Mr. Tate owns.

Thank you for your consideration and if you have any questions please do not has to take to contact me at 717-586-7381 or via email.

Sincerely,



Wm. Craig Zumbrun
Chair

Exhibit 12

