



**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

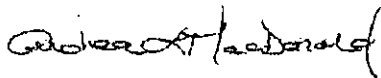
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In stark contrast, Columbia Gas seems to be treating all properties without regard to their historic designation, and even when property owners request an inside location under the provisions of 59.18, few, if any, exceptions are approved.

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

