



April 8, 2022

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street – Second Floor North  
Harrisburg, PA 17120

**Proposed Rulemaking Docket No. L-2019-3010267**

On behalf of JARI, a nonprofit economic development organization that has been a devoted partner of the business community in Cambria and Somerset counties since 1974, please accept these comments regarding proposed new rules related to the pipeline transport of petroleum products and hazardous liquids in intrastate commerce. Elements of this proposal would have a direct effect on our region.

Given the effectiveness of current safety regulation, the costs of imposing these regulations far outweigh any potential benefits of adopting this rulemaking, especially when it comes to products that are imperative to our economy and Pennsylvania's electricity supply. Specifically, the proposed rulemaking would add onerous, unnecessary regulations for public utilities operating pipelines that transport petroleum products and hazardous liquids, such as ethane.

Ethane is delivered by Mariner East 2 to Competitive Power Ventures Inc.'s Fairview Energy Center in Jackson Township, Cambria County, a power plant that uses ethane in part to supply electricity. This state-of-the-art energy center is meeting the energy needs of more than 1 million Pennsylvania homes.

The way this regulation is designed, it makes it potentially retroactive in nature. While we believe these proposed regulations should not be applied to any pipelines, in particular they should not be imposed on existing, in-service pipelines and facilities. If pipeline developers would have to go back and change depth of cover and underground clearance for existing lines, as proposed, they would have to loop the line, lay a new line next to it, or excavate it and find a way to safely lower it.

This would directly conflict with the PUC's mission to ensure "safe and reliable utility service at reasonable rates." Pipeline utilities would be forced to file additional rate cases and ultimately raise rates to recover costs. This would mean utilities and/or shipping communities pay more and pass on that cost to the consumer. Costs would rise significantly for fuel and natural gas liquids like ethane,

propane and butane. Now is not the time to potentially drive up electricity prices, which have seen significant increases and will likely continue to increase in the near future.

Pipelines remain the safest and most efficient way to transport our energy resources to supply consumers, manufacturers, and big and small businesses alike. The benefits aren't off in some distant location or far off in the future. They are happening right now and already providing huge benefits in places like Cambria County. We do not want to see proposed regulations that would roll back these advancements or deter investment in our region.

Sincerely,



Linda Thomson, President  
Johnstown Area Regional Industries (JARI)