



April 12, 2022

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

**Re: PUC Proposed Rulemaking- Docket No. L-2019-3010267**

On behalf of Boilermakers Local 13, I am writing to express our strong opposition to the proposed rule that is currently before the Pennsylvania Public Utility Commission (PUC). Docket No. L-2019-3010267 would add new burdens on businesses in our community, add to inflation on consumer prices, and hurt the reliability of our energy supply.

Boilermakers Local 13 plays a vital role in the construction landscape of eastern Pennsylvania. We are a part of the International Brotherhood of Boilermakers --- a labor organization representing more than 50,000 highly skilled workers in all manufacturing industries throughout the United States and Canada. Our local union provides the highest quality services throughout Pennsylvania and even into Delaware. Our storied reputation in Pennsylvania's energy sector renders us particularly invested in the PUC's rulemaking.

Rather than imposing more unnecessary regulations in our commonwealth, we recommend the PUC work to make our business environment more competitive and favorable to investment and the high-paying, family-sustaining, skilled labor jobs that creates.

First and foremost, our country desperately needs to expand our energy supply, so it would be misguided to restrict its production or transportation, as this PUC rule would do. Rising inflation has impacted every single American, and it has been particularly painful in terms of energy prices. Going forward with these proposed regulations would disrupt pipeline service and restrict supply and access to fuels and natural gas. Restricting supply ultimately would mean an increase in prices on industry, small businesses, and consumers.

Compared to other forms of energy transportation, such as rail and trucking, pipelines are the safest method of transport. According to the Pipeline and Hazardous Materials Safety Administration (PHMSA), which has responsibility for ensuring the safety of our national pipeline system, pipelines are “one of the safest and least costly ways to transport energy products.” Our oil and gas pipelines provide the resources needed for national defense, heating and cooling our homes, generating power for business, and fueling a vast transportation network. The PUC’s mission is to ensure “safe and reliable utility service at reasonable rates.” However, this rule would significantly impact reliability. As written, these rules would either disrupt service, or push service to less-safe modes of transportation like truck or rail, as investments in pipeline would diminish.

It is also concerning that no cost-benefit analysis has been conducted for the current rulemaking process, and the PUC should wait for a completed analysis before adopting these regulations. It is crucial that government make decisions based on facts, because unnecessary rules like this one can stymie business development and hurt job creation.

Instead of unnecessary, burdensome rules on energy companies, our state officials should be focused on reducing barriers to economic growth. Pipeline infrastructure keeps our neighbors, employers, and workers connected. It would be a mistake to threaten this progress with burdensome regulations. **We strongly urge the Public Utility Commission to reassess the proposed rulemaking in Docket No. L-2019-3010267.**

Best Regards,

A handwritten signature in black ink, appearing to read "John D. Bland". The signature is fluid and cursive, with the first name "John" being the most prominent part.

John D. Bland

Business Manager/Secretary-Treasurer  
Boilermakers Local 13