



COMMONWEALTH OF PENNSYLVANIA

October 7, 2024

E-FILED

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

**Re: Replacement of Older Plastic Pipe in Natural Gas Distribution Systems /
Docket No. M-2024-3050313**

Dear Secretary Chiavetta:

Enclosed please find Comments in response to the Tentative Order dated August 26, 2024, on behalf of the Office of Small Business Advocate (“OSBA”), in the above-referenced proceeding.

If you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ Rebecca Lyttle

Rebecca Lyttle
Assistant Small Business Advocate
Attorney I.D. 201399

Enclosures

cc: Kevin Higgins

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Replacement of Older Plastic Pipe in :
Natural Gas Distribution Systems : **Docket No. M-2024-3050313**
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**COMMENTS OF THE
OFFICE OF SMALL BUSINESS ADVOCATE**

The Office of Small Business Advocate (OSBA) supports the Pennsylvania Public Utility Commission’s (Commission) Tentative Order regarding the accelerated replacement of older plastic pipe by public utilities distributing natural gas. The OSBA agrees it is important to install and maintain safe and reliable infrastructure in the Commonwealth’s natural gas distribution systems. Consequently, the OSBA agrees it is appropriate for the Commission to explore the acceleration of older plastic pipe replacement.

The Tentative Order calls for re-issuing a data request to natural gas distribution companies to gather information on the approximate current mileage and service tees of the older plastic pipe installed and operational in Pennsylvania. The OSBA supports the objective of understanding the full universe of older plastic pipe materials in operation and agrees this is an important first step.

Regarding the proposal in the Tentative Order to modify long-term infrastructure improvement plans to target the replacement of older plastic pipes and the proposed requirement for non-distribution system improvement charge eligible utilities to file Pipeline Replacement

plans, the OBSA emphasizes the need to strike a balance between the speed of pipe replacement and the cost to customers. The OBSA supports the objective of replacing older plastic pipe and advocates for the impact to customer rates to be considered as part of the Pipeline Replacement plan.

Respectfully submitted,

/s/ Rebecca Lyttle

Rebecca Lyttle
Assistant Small Business Advocate
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DATE: October 7, 2024