



October 7, 2024

Via Electronic Filing

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

Re: Tentative Order Regarding Replacement of Older Plastic Pipe in Natural Gas
Distribution Systems
Docket No. M-2024-3050313

Dear Secretary Chiavetta,

The Public Utility Commission's ("PUC" or "Commission") Bureau of Investigation and Enforcement ("I&E") offers this letter in lieu of comments in support of the Commission's Tentative Order regarding Replacement of Older Plastic Pipe in Natural Gas Distribution Systems, as referenced above. It is the PUC's mission to protect the public interest and ensure safe and reliable utility service to the citizens of this Commonwealth. As the PUC's enforcement division, we see firsthand the significant risk older plastic pipe poses. Accordingly, I&E appreciates the Commission's commitment to accelerating the replacement of older plastic pipe to further promote safe and reliable gas service to the public.

The United States Department of Transportation, through its Research and Special Programs Administration, has issued four (4) advisory bulletins indicating the difficulty to detect brittle-like cracks in the plastic pipe installed from the 1960s through the early 1980s until a significant amount of gas has already leaked from the pipe. Encouraging national gas distribution companies ("NGDCs") that are eligible for a Distribution System Improvement Charge ("DSIC") under Act 11 of 2012 to amend their long-term infrastructure improvement plans ("LTIIPs") to focus on the replacement of older plastic pipe highlighted in the United States Department of Transportation's advisory bulletins will be greatly beneficial to ensure that the public has safer natural gas service. LTIIPs related to the replacement cast iron and bare steel pipe have been successful in the Commonwealth. Although cast iron and bare steel has not been completely replaced, significant steps have been made related to identifying known risks and making plans for the replacement within a specified timeframe. We can expect the same for the replacement of older plastic pipe.

Regarding smaller natural gas public utility systems that may not be eligible to use a DSIC, the proposed Pipeline Replacement Plans and their filing requirements, including replacement timeframes and compliance with replacement performance metric, allow for reasonable opportunities for these smaller systems to make their systems safer while still working within their financial restraints.

I&E supports the Commission's Tentative Order, as its purpose is to promote the PUC's mission to ensure safe and reliable utility service. Amending LTIIPs to target the accelerated replacement of older plastic pipes will promote the PUC's mission to ensure safe and reliable utility service. Additionally, the requirement for non-DSIC eligible public utilities distributing natural gas to file Pipeline Replacement Plans provides smaller utility services the opportunity to make their services safer while working within financial and time constraints. Accordingly, I&E commends the Commission for taking steps contained in the Tentative Order to accelerate the replacement of older plastic pipe.

Respectfully submitted,



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