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January 30, 2026

Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, Pennsylvania 17120

**Re: TUS Data Request Addressed to Public Utilities Distributing Natural Gas
Concerning Plastic Pipe Data - 2025
Docket No. M-2024-3050313**

Dear Secretary Homsher:

The Energy Association of Pennsylvania submits this letter on behalf of its natural gas distribution company (“NGDC”) members regarding the above-referenced data request. Our members may be submitting varying levels of information in response to the Bureau of Technical Utility Services’ data request, and we write to provide context and highlight key policy considerations that inform their responses.

As detailed in our October 7, 2024 comments and October 22, 2024 reply comments, EAP supports a risk-based approach to older plastic pipe replacement that centers on each utility’s Distribution Integrity Management Plan (“DIMP”). The DIMP process provides the appropriate framework for identifying threats, assessing risks, prioritizing mitigation measures, and determining the appropriate timing for replacement of older plastic pipe based on each company’s unique circumstances.

We respectfully maintain that a “one size fits all” approach does not appropriately account for critical differences among Pennsylvania’s NGDCs, including: the age and composition of each system; risks already identified and prioritized through DIMP; the nature and demographics of service areas; and the financial condition of utilities coupled with ratepayer ability to absorb costs. Risk mitigation decisions should remain with utility management, informed by ongoing DIMP analysis and subject to Commission safety oversight through regular audits.

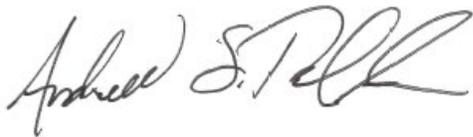
Several of our members have already incorporated older plastic pipe replacement into their Long Term Infrastructure Improvement Plans based on their DIMP risk assessments. Others are proactively removing first-generation plastic pipe attached to higher-risk mains being

replaced as part of existing pipe replacement programs. The data the companies provide to this data request will similarly vary.

EAP appreciates the Commission's focus on this important safety issue and supports continued collaboration between the Commission, its Safety Division, and individual NGDCs through the existing DIMP audit process. We believe this approach better serves public safety by allowing for tailored solutions that reflect each system's specific risk profile while maintaining rigorous regulatory oversight.

EAP and its members remain committed to working with the Commission and Commission staff to ensure the safe and reliable operation of natural gas distribution systems throughout Pennsylvania.

Very truly yours,

A handwritten signature in black ink, appearing to read "Andrew S. Tubbs". The signature is fluid and cursive, with the first name being the most prominent.

Andrew S. Tubbs
President & CEO

CC: Matthew Stewart, Bureau of Technical Utility Services (via email—mattstewar@pa.gov)