

MAY 16 2022

**Independent Regulatory
Review Commission**

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To whom it may concern:

I am writing to comment on PUC docket L-2019-3010267, the proposed changes to Chapter 59 of Title 52, relating to pipeline regulations.

In the proposed 59.131, I agree with the definition of "affected public" as "residents and places of congregation (businesses, schools, and the like) along the pipeline and the associated right-of-way within 1,000 feet, or within the LFL [lower flammability limit], of a pipeline or pipeline facility, whichever is greater." Recently I have learned, thru a justified action I took to point out the truths in this process of regulation and enforcement, which lead to charges of disorderly conducts (causing a hazard with no legitimate purpose, and also now a court ruling of "Not Guilty". I happen to be the defendant Who had to listen to a judge rule based upon justification that the harm I called stopping at pipeline was lesser than a harm that I was trying to prevent- that being the Mariner East Pipelines - I was justified in my actions because I am in imminent danger, in fact I am harmed.

I would like to talk about the things that are still lacking in these rules that are reactive. I would like to help my civil service and do my duty to help identify issues not addressed. I do not wanna change the rules I want to proactively strengthen them with understanding and proving that we are lacking data which is essential in this process AND through the empirical data we currently have available.

Lets be real, most of these rules were established from the experience of the Mariner East and what the watchdog community has observed, documented, and validated as a failure of a system bound by duty, science, and laws brought to the attention of our civil service- with a Critical component: hard evidence and resilience.- which I am very grateful for the state, to actually do what is in their power to make stricter rules then the bare minimum federal standards or guidelines)

All of this is a good start, however it is still neglecting critical elements such as addressing 49CFR195-

Which is a liquid Pipelines regulation which is a federal regulation, AKA bare minimu. YET PENNSYLVANIA can go further and start addressing that these liquid pipeline regulations are antiquated, scientifically speaking, and therefore inadequate when it comes to the safety of them. With HVL and CO2 pipelines, for instance, we are dealing with a different type of liquid when it comes to the regulation of 195 because it was originally intended for liquids with different chemical and physical properties.

These liquids we are dealing with are UNNATURALLY forced into liquid phase solely for the reason of transport, when they are NATURALLY a gas (speaking in terms of chemical/physical properties).

I have many more issues within this rule making proposal and I hope that you give me the opportunity to be a part of this process.

Regards

Christina DiGiulio

Resident of Chester County PA