



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

April 12, 2022

Dear Ms. Chiavetta,

On behalf of the International Brotherhood of Electrical Workers Local 654, we urge the Pennsylvania Public Utility Commission (PUC) to reconsider its proposed rulemaking, **Docket No. L-2019-3010267**.

As President and Assistant Business Manager of IBEW Local 654, I have seen the exceptional work product that our craftsmen deliver to each project they are involved with. They use the safest and most efficient tactics possible to complete each job. This means that first and foremost they ensure that regulations are met and kept during any project.

Pennsylvania already has some of the highest regulations when it comes to pipelines projects out of any state in the country. Moreover, comprehensive, and adequate federal safety regulations already exist, administered by the Pipeline and Hazardous Materials Safety Administration (PHMSA). The current PHMSA federal gas safety regulations already ensure pipeline safety. If the PUC regulations were imposed, Pennsylvania would be the only state regulated to this degree.

Many of the changes proposed, such as digging each section of the pipeline deeper than current regulations require, and potentially digging up existing lines, will increase cost and disruption. In some areas, the cost increase with the proposed rulemaking could be up to \$10 million per mile of pipeline in rural areas and up to \$30 million per mile in urban and suburban areas.

For these reasons and others, I urge you to reconsider **Docket No. L-2019-3010267**. Thank you.

SINCERELY,

Bill Adams

President and Assistant Business Manager

International Brotherhood of Electrical Workers Local 654