

2658

COMMENTS OF PHILADELPHIA GAS WORKS  
PROPOSED AMENDMENTS TO 25 PA.CODE §126.612

RECEIVED  
MAR 17 2008  
ENVIRONMENTAL QUALITY BOARD

I. INTRODUCTION

PGW is a municipally owned natural gas utility which provides service to 500,000 customers via 6,000 miles of mains and service pipes within the City of Philadelphia. PGW is an environmentally friendly business which has consistently been involved in environmental improvements, such as significant reductions of Nitrogen Oxide (NOx) from natural gas plant emissions, the utilization of compressed natural gas vehicles in the Company's motor vehicle fleet and active participation in the City of Philadelphia's Local Action Plan for Climate Change.

II. COMMENT

PGW's main concern about the diesel idling restriction is the Company's use of diesel-powered commercial motor vehicles for natural gas infrastructure field work. This critical field work, performed on a daily basis, is considered safety and/or emergency-related and requires various diesel powered vehicles at greater than 8500 GVW to respond to these critical needs. Idling beyond the time permitted by 25 Pa.Code §126.611 is required to provide safe and reliable field repairs and services.

The need for this exemption has already been recognized by Title 12 of the Philadelphia Code, which states:

**§ 12-1127. Excessive Idling of and Noise from Motor Vehicles.**

(1) No person shall cause or permit the engine of a motor vehicle to idle for longer than three minutes while parking, stopping or standing, except this prohibition shall not apply to:

\*\*\*

INDEPENDENT REGULATORY  
REVIEW COMMISSION

2008 MAR 24 AM 10:43

RECEIVED

(b) an Authorized Emergency Vehicle, including Public Utility vehicles engaged in emergency repair work and maintenance;

Additionally, the City's Dept. of Public Health Air Management Services Summary of Anti-Idling Requirements provides the same exemption for "[e]mergency or Public Utility vehicles performing emergency work or maintenance."

PGW requests the inclusion of an additional exemption to 25 Pa.Code §126.611 based upon the foregoing. The following sets forth the related exemptions:

**§ 126.612. Exemptions.**

(a) A diesel-powered commercial motor vehicle may idle beyond the time allowed in § 126.611 (relating to idling restriction) for one or more of the following reasons:

PGW proposes for inclusion in 25 Pa.Code §126.612 one of the following exemptions (each alternative has the same effect):

- When a Public Utility vehicle is engaged in emergency repair work and maintenance.

**OR**

- When a motor vehicle is exempted by county, city, town, township, borough or local air authority idling regulations or codes in existence before \_\_\_\_\_. (Note: The blank refers to the effective date of adoption of this proposed rulemaking).

**OR**

- When a Public Utility vehicle is exempted by county, city, town, township, borough or local air authority idling regulations or codes in existence before \_\_\_\_\_. (Note: The blank refers to the effective date of adoption of this proposed rulemaking).

Respectfully Submitted,

Michael W. Handwerk  
V.P. – Technical Compliance  
PGW  
(215) 684-6544