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DEPARTMENT OF ECONOMIC DEVELOPMENT
AND NEIGHBORHOOD REVITALIZATION

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SECRETARY'S BUREAU

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July 10, 2012

Pennsylvania Public Utility Commission
Attn: Secretary
P.O. Box 3265
Harrisburg, PA 17105-3265

RE: Comment on Docket No. L-2009-2107155, Amendment to Pa. Code § 59.18 Meter Location

Dear Commissioners:

I am submitting the following comments to the proposed **Rulemaking Amendment to 52 Pa. Code § 59.18** on behalf of the City of Lancaster's Historical Commission, the review body responsible for oversight of the City's local Heritage Conservation District.

The PUC Proposed Rulemaking Order ("Rule") contains language that addresses the placement of meters and regulators on exterior locations of buildings "with the exception of historic districts." The members of the Historical Commission appreciate the incorporation of special provisions within the proposed Rule that would allow for sensitive and appropriate alternative locations for equipment on buildings within designated historic districts. However, references to "historic districts" within the proposed Rule require clarification.

Historic District Definitions and Exceptions

Item (7) (c) (1) of the PUC Proposed Rulemaking Order (Rule) states that "Inside meter locations shall be considered only when: "(i) an acceptable outside location is not available due to restrictions in Federally-approved historic districts." Language elsewhere in the Rule allows for placement of entire meter sets inside a building based on "historic area prohibitions and zoning ordinances." The Rule appears to allow for utility companies to consider alternatives to exterior meter placement within historic districts, but does not clearly define "historic district" status nor does it clearly state what types of "restrictions" would trigger this exception.

The City of Lancaster has one of the largest federally-designated National Register Historic Districts in the United States, containing more than 14,000 historic structures within the boundaries of the City's original four square miles. The locally-controlled Heritage Conservation District was established by Lancaster City Council in 1999 and overlays the large National Register Historic District, providing for public review of alterations, demolition and new construction activity that impacts individual buildings as well as wider neighborhoods and the historic district as a whole.

The Rule should clarify whether local utility companies will alone determine the siting of meters or will permit local municipalities to uphold existing regulations and design guidelines contained within their local historic district ordinances.

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Alternative Locations for Meters

The proposed Rule states that: "Allowances for inside meter and regulator sets are based upon historic area prohibitions and areas that have high amounts of vandalism." The Rule allows for, but does not require, inside meter locations, while stating that "the utility will make the ultimate siting determination."

The proposed Rule should require local utility companies to establish design guidelines or provide concrete examples of alternative placement of exterior meters and regulators within historic districts, addressing both safety concerns and the physical and visual impact that equipment will have on individual buildings and streetscapes within historic districts.

The majority of buildings within Lancaster's Heritage Conservation District are contiguous rows of nineteenth-century houses and commercial buildings, not freestanding structures, and these buildings have limited setbacks and generally lack front yards. When reviewing applications for work within the Conservation District, the members of the Historical Commission must consider the design guidelines contained within the historic district ordinance as well as the federal *Secretary of the Interior's Standards for Rehabilitation of Historic Structures*. The proposed Rule should establish clear criteria for placement of meters and regulators since exterior installations may conflict with guidelines adopted within local historic district ordinances.

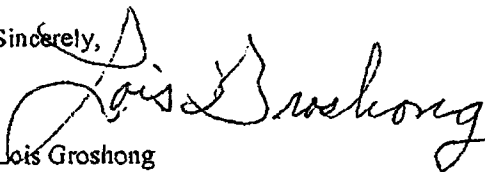
Public Notification

The proposed Rule has no specific provisions for public notification of impending meter installations or any accommodation for property owner input or consent. The Rule should be revised to include clear procedures that require local utility companies to alert customers to impending meter installations, with a defined timetable for implementation of the work and *alternatives available to property owners within designated historic districts*. This notification process should allow sufficient time for property owners to consider their alternatives and options.

The members of the City of Lancaster's Historical Commission urge the Pennsylvania Public Utility Commission to add more specific provisions to the PUC Proposed Rulemaking Order that will balance public safety with local historic district ordinances that have been enacted by municipalities to safeguard the character of historic neighborhoods and to protect and preserve irreplaceable historic architecture.

Thank you for your consideration of these comments.

Sincerely,



Lois Groshong
Chairperson

City of Lancaster Historical Commission