



CITY OF PHILADELPHIA

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COMMISSION

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11 July 2012

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

RE: Comments on Docket No. L-2009-2107155, Amendment to 52 Pa. Code Sec. 59.18 Meter Location

Dear Secretary Chiavetta:

Thank you for providing the Philadelphia Historical Commission (PHC) with an opportunity to comment on the above-mentioned proposed rulemaking order regarding the locations of natural gas meters. The PHC is the regulatory agency responsible for ensuring the preservation of historically significant buildings, structures, sites, objects, interiors, and districts in the City of Philadelphia, which is recognized as a Certified Local Government by the National Park Service and Pennsylvania Historical & Museum Commission. Created by City Council ordinance in 1955 and reorganized in 1985 under Section 14-2007 of the Philadelphia Code, the PHC identifies and designates historic resources, listing them on the Philadelphia Register of Historic Places. It regulates preservation through the City's building and other permitting processes. With its federal certification, the PHC performs federally-mandated environmental clearance and historic preservation reviews for public and quasi-public municipal agencies. During all of its reviews, both local and federal, the PHC safeguards the city's unique heritage and wealth of cultural resources as it encourages economic development, promotes healthy and sustainable communities, enhances property values, attracts new residents, businesses, and tourists, provides educational opportunities, and fosters civic pride.

The PHC has reviewed the proposed rulemaking order and recommends the following revisions to ensure that historic resources in the City of Philadelphia are protected from adverse effects, both physical and visual, that might otherwise result from the installation of gas metering equipment. The PHC notes that it enjoys a collaborative, productive relationship with the Philadelphia Gas Works, the local natural gas utility, which could be disrupted if the proposed regulation is implemented in its current form. The PHC recognizes the need for natural gas to be supplied safely, efficiently, and reliably, but respectfully requests that the Pennsylvania Utility Commission consider these comments regarding the proposed regulation for gas meter placement and location to safeguard historic resources. The site of the founding of our nation, Philadelphia is one of our country's most historic cities and its historic resources are one of its most valuable assets. Every measure should be taken to protect these assets, which not only inform us of our shared past, but also promise a prosperous future.

The PHC comments that the language in the proposed regulation identifying historic resources is not only vague, but is also not customary in historic preservation discourse. Therefore, the PHC suggests adding the following as Section 59.18.a.13:

- (13) Properties shall be considered historic if they are:
- (i) individually listed on or within a historic district listed on the National Register of Historic Places, or,
 - (ii) individually listed on or within a historic district listed on a register of historic places regulated by a local government recognized as a Certified Local Government by the National Park Service and Pennsylvania Historical & Museum Commission.

The PHC contends that historic preservation considerations should be taken into account when considering where and how to install gas metering and regulating equipment. Therefore, the PHC suggests adding the following design and location criterion to Section 59.18.b.3:

- (3) A utility shall consider proper design and location criteria for a meter box, including the following:
- (viii) The physical and visual impact of meters and service regulators on historic properties as defined in Section 59.18.a.13.

The PHC asserts that the term "considered" used in the proposed regulation at Section 59.18.c.1 is too vague and should be replaced. The PHC also asserts that the wording in Section 59.18.c.1.i is awkward and open to various interpretations. Therefore, the PHC suggests the following amendments to Section 59.18.c.1 without comment on the clause related to "high risk vandalism districts":

- (1) Inside meter locations shall be ~~considered only~~ provided when:
- (i) the subject property is historic as defined in Section 59.18.a.13 and an outside installation will damage or obscure historic features and/or will be conspicuous from the public right-of-way.

Thank you for the opportunity to comment and for your consideration of these suggestions. Please contact me if I may provide any additional information.

Yours truly,

A handwritten signature in black ink, appearing to read "Jon F", with a long horizontal flourish extending to the right.

Jonathan E. Farnham, Ph.D.
Executive Director