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OAPA Comments on Proposed Rulemakings Docket L-2009-2107155 Meter Locations

The Old Allentown Preservation Association has been promoting restoration and preservation efforts in the Old Allentown Neighborhood for thirty-four years. The neighborhood was designated a historic district in 1978 under city ordinance 112314 and later the same year by the PA Historic and Museum Commission. Our mission has been to protect, preserve and restore the housing stock of the neighborhood to its historic character. Old Allentown consists of approximately 1,000 structures in a sixteen square block area. While varied, the typical architecture of the neighborhood primarily consists of residential row homes typically under 20' in width set within 4' of the public right of way.

Over the last eighteen months we have attempted to work with the local gas service provider (UGI) to reach a compromise regarding meter upgrades and relocation. Unfortunately the results of the work performed in and around our neighborhood have been less than satisfactory and as written the proposed rule change will do little to prevent additional damage from being done. While we understand the need for a robust and safe gas distribution system, the proposed change is vague and does not make clear a property owner's rights in regards to equipment placement. Our primary concern is the requirement that equipment be installed on the façades of structures visible from the right of way. We offer the following observations regarding the proposed rules by section.

Meter locations (1) and (2):

While indoor and outdoor locations are listed as appropriate, it is not made clear as to who determines the ultimate location of the meter and outdoor meter locations are determined by the utility. Additional language should be added to clarify the degree of input a property owner has in equipment placement.

General requirements (3):

Outdoor meters are required "when availability of space and other conditions permit." Who makes this determination and by what standard? Additional language needs to be added defining minimum clearances from window, entry-ways, stairways and the public right of way. Based on some of the recent installations in Allentown, the utility feels any condition will permit an outdoor installation.

General requirements (4):

It is recommended to protect equipment from vehicles, construction equipment, falling objects, packed snow and ice etc. It would seem that an indoor installation would have a distinct advantage in this area.

General requirements (7):

The language used to require accommodation of meter access implies that no indoor meter installations would be allowed. Meter reading is largely done wirelessly and should have no bearing on equipment placement. Lack of access to indoor equipment is largely a failure of the utility to foster customer relations. The requirement to be able to operate the gas shut-off valve begs the question, how accessible does the shut-off valve need to be? A standard tamper resistant below-grade valve at the curb would seem to provide reasonable access. As being currently installed, shut-off valves are unprotected and clearly visible from if not in the right-of-way. We would argue that there is such a thing as too accessible.

Excluded locations (9):

Additional language is required to define proper clearances from windows, doors and air intakes. Consideration of the local architecture reveals that in many cases window and door locations preclude placement of outdoor equipment.

Outside meter or service regulator locations (b) (1):

What qualifies as a protected location needs to be defined. Recent installations include regulators placed in front of concrete porches in the public right of way. One would be hard pressed to explain how this equipment is protected in any sense.

Outside meter or service regulator locations (b) (2):

Placement of regulators is allowed in a properly designed buried vault or meter box. This seems to be a Catch 22 as UGI is unaware of the existence of any such vault or box. We have lobbied UGI to use vaults in lieu of above ground equipment with no success. Additional language is required to define specifications for an appropriate vault.

Inside meter or service regulator locations (c) (1) (i):

Additional language is required to define exempted historic districts. As worded, the majority of historic districts would not be considered as the state authority approves them. High-risk vandalism areas should be identified by local authorities and such determinations should be binding.

Inside meter or service regulator locations (c) (2) and (6):

Here we have a clear contradiction. Paragraph (2) states regulators must be inside and paragraph (6) implies they are allowed inside and provided guidelines for proper venting. Current implementation by UGI is placing all regulators outside regardless of potential safety, aesthetic or practical issues. Clear guidelines need to be written for appropriate circumstances for indoor regulator placement.

Inside meter or service regulator locations (c) (3):

While there is no objection to outside shut-off valves, they should be reasonably tamper proof. Covered below grade valves would seem to meet this condition.

Inside meter or service regulator locations (c) (4):

Steel service lines have been identified as a serious potential risk in the event of excavation incidents. While moving regulators to an outdoor location would mitigate the risks

associated with the steel service lines, other corrective actions are not identified as acceptable options. The replacement of the steel lines with thermoplastic lines in conjunction with automatic shut-off valves as well as an ever improving one-call program achieve comparable safety standards with minimal cost while preserving the aesthetic character of the structure.

Conclusions:

In general the policy is written with no regard to the nature of the local architecture or property owner's rights. The placement of equipment outside under any and all circumstances in the name of safety is, in our opinion, a faulty risk assessment. The policy is so vague as to allow installation of equipment in a manner that is, from a contractors perspective, unacceptable from both a practical and aesthetic standpoint. The two issues the policy attempts to address are safety and utility company access to equipment. The issue it wholly fails to address is practical application and quality of work.

It is clear that there are several options to mitigate safety concerns and these should be reflected in the new code. Implementation of these options should be implemented at the discretion of local historic associations and the property owners. In the case of historic districts, the district's requirements should be within code and binding to the utility provider. Properties not within an established historic district should also have these options available to them in a non binding fashion allowing property owners input on the scope of work to be performed on their properties.

In regard to utility company access to equipment, we have been given the impression that the utility companies would rather deface entire neighborhoods than deal with their customers. We view this as a customer relations and policy enforcement issue on the part of the utility provider. Even in the process of moving equipment UGI has failed to notify property owners that work was scheduled on their homes and we have fielded several calls from residents who have returned home to find work has been conducted on their property without notice or consent. We can't in good conscience support a policy that serves the convenience of the utility at the homeowner's expense.

To be honest, low bid contractors are doing hack job work on our properties because the existing code is vague and the proposed code is of little improvement. Recent installations in and around our neighborhood vary from marginally acceptable to entirely inappropriate. There is little consistency in placement and workmanship and equipment is being placed in any location that offers the path of least resistance to the contractor regardless of appropriateness. There seems to currently be no recourse to address the poor quality of work performed because it technically meets code and the utility says it is required.

Attached are examples of some of the recent installations referenced. These are by no means isolated cases. Entire blocks have been negatively impacted by the implementation of this policy. We encourage PUC board members to get out into the field and see first hand the damage that is being done.

Edward M. Morrison
President OAPA
7/12/12



800 Block of Chew St. 2012 Installation.
Unprotected with excessive exposed piping.



900 Block of Liberty St. 2011 Installation.
Unprotected with excessive exposed piping
terminating under center of front door.

The following is the written response received
when this installation was received.

"Kelly, thanks for getting back to me with your concerns. First I wanted to let you know that I and UGI do take your concerns very seriously even though it may not seem like it. The only thing I can do is to grow our relationship with the city and the residents from here on.

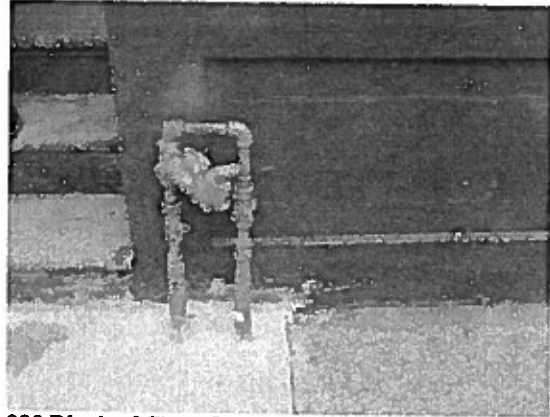
The picture you included was the second time I viewed it. Mark Hartney sent me a similar picture some time ago for me to explain why this was installed this way. Believe it or not there was a reason, if my memory serves me well I believe a section of this house is on a slab and therefore there was no way to enter the home but the way you are looking at. Please rest assure we will be repairing the sidewalk. In fact, I have 3 sidewalk crews in Allentown alone repairing the patches that we have disrupted. Your other question about stamped concrete, if we break it we will repair it to same style and hopefully condition. This is not always easy but we try and work it out with the residents.

I had a meeting with the Mayor the other day and Chew St. and some other streets did come up in

conversation. I have told my contractors that this is a hot spot and that at their earliest convenience to repair these patches.

If you have other questions, please do not hesitate to call me directly at 610-807-3160.

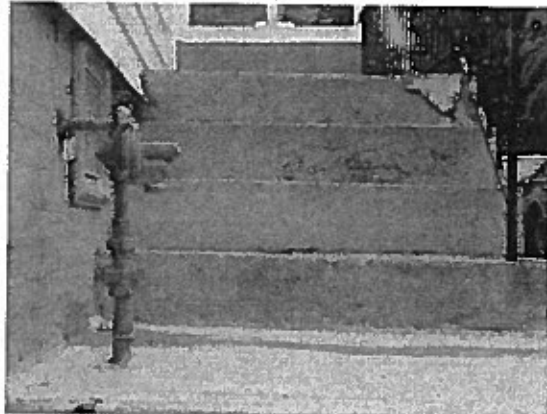
Sincerely,
Brian Slinsky
Operations Manager Lehigh"



900 Block of Chew St. 2012 Installation.
Unprotected and extending into right of way. The regulator was partially blocking stairs and resident complained of hitting leg on it. UGI rotated regulator 90 degrees.



1000 Block of Chew St. 2012 Installation.
Unprotected with excessive exposed piping likely to be utilized as a handrail.

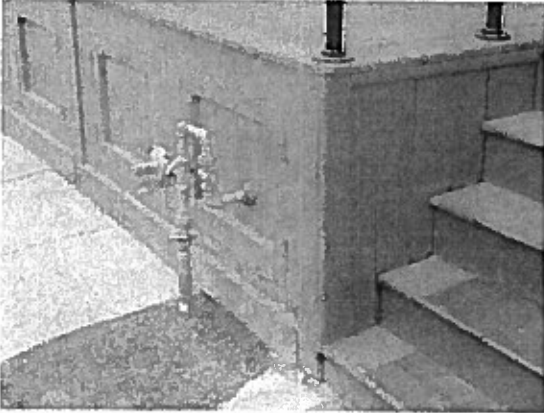


800 Block of Chew St. 2012 Installation.

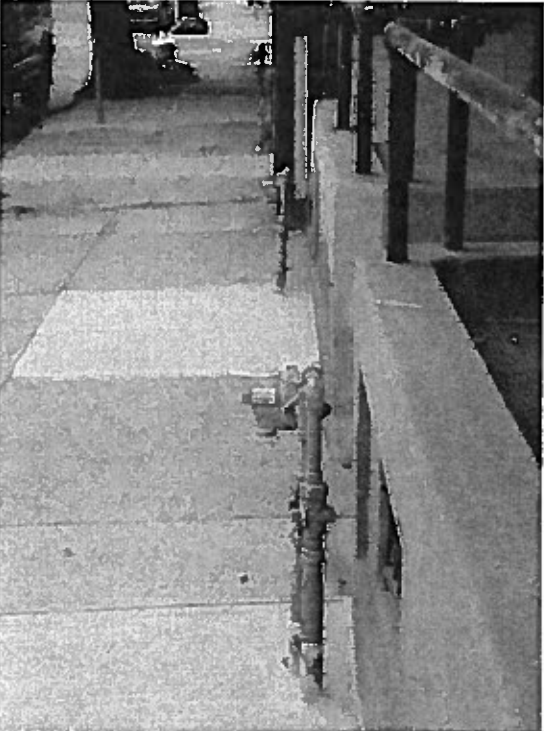
Unprotected and partially blocking steps.



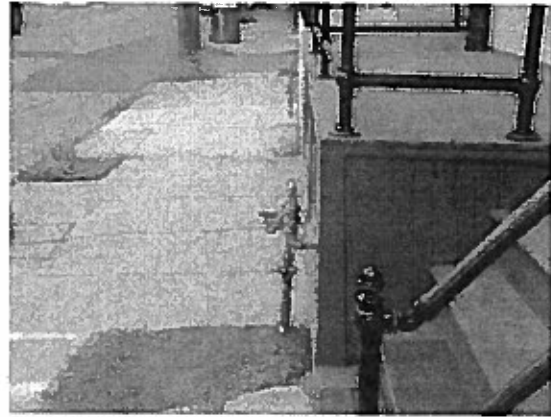
**900 Block of Chew St. 2012 Installation.
Unprotected and in very close proximity to entry point.**



**800 Block of Chew St. 2012 Installation.
Unprotected and extending into right of way with no options for concealment.**



**900 Block of Chew St. 2012 Installation.
View of multiple regulators along Chew St.**



**800 Block of Chew St. 2012 Installation.
View of multiple regulators along Chew St. There are 44 regulator installations between 8th and 10th Streets.**



**1600 Block of Turner St. 2011 Installation.
Excessive exposed piping that is not consistent with other installations on the block.**



**1600 Block of Turner St. 2011 Installation.
Close proximity to stairs and regular foot traffic with no available options to hide or protect equipment.**

These examples represent what UGI has said is the best compromise they can offer. Other neighborhoods would also have outdoor meters along with the regulators.



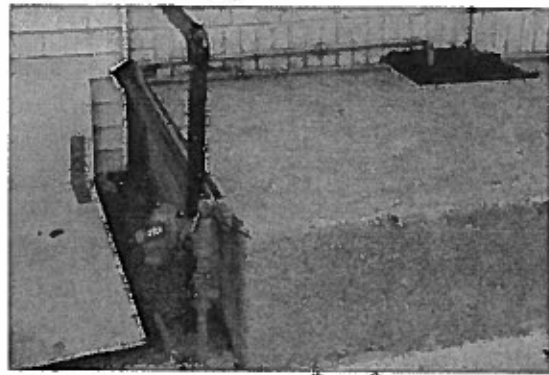
400 Block of 7th Street 2011 Installation.
Regulator presents a clear tripping hazard.



600 Block of 8th St. 2011 Installation.
This is a good illustration of the density of equipment placement.



400 Block of 7th St. 2011 Installation.
Regulator used as security anchor.



Location unknown, possibly 7th of 8th st.
Excessive exposed piping.



Two cars collide in Allentown, then one hits home and detaches gas meter - UPDATE

Published: Friday, May 11, 2012, 12:10 PM | Lastdate: Friday, May 11, 2012 12:10 PM

By Tracy Staudt | The Express-Times
20 Followers

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The cars crashed about 9:15 this morning at North Penn and Chestnut streets in Allentown and one of them then struck a home, detaching the gas meter.

North Penn Street was closed at Linden Street. The home at 111 W. Penn St. was evacuated, and the city was using the gas meter about 10 this morning.

The crash occurred after John Morreale, 39, of Allentown, was driving east on Chestnut Street and failed to stop at a stop sign at that intersection, police Capt. David Hendricks said.

Morreale's car struck a vehicle driven by Warren Cruz, 34, of Middletown Township. Hendricks said, Morreale was seriously injured. He said, but Cruz was taken to an area hospital after complaining of back pain.

Hendricks said Morreale has been cited for a stop sign violation. He told Cruz he did not see the stop sign, Hendricks said.

Contact Allentown reporter Cole Stedley at 484-851-2342 or cstedley@express-t.com



Photo: Scott | The Express-Times
The cars crashed about 9:15 this morning at North Penn and Chestnut streets in Allentown and one of them then struck a home, detaching the gas meter. (Photo: Tracy Staudt | The Express-Times)

This will not be an uncommon occurrence. There are multiple vehicle vs. house accidents in Allentown every year.