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SECRETARY'S BUREAU

July 10, 2012

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

RE: Gas Meter and Regulator Location (Docket No. L-2009-2107155)

Dear Rosemary Chiavetta:

I live in Allentown, PA and I also own property in the Old Fairgrounds Historic District. I would greatly appreciate if the Public Utilities Commission Commissioners (PUC Commissioners) would allow gas meters and regulators to remain in the basements of properties located at least in the Historic Districts for the following reasons outlined below. Many residents are still not happy with the idea of having a gas regulator in the front of their property even though the gas meters would remain in the basements.

Our community residents would ideally like to see all equipment remain in the basement and have a gas vent installed to allow any discharge from the regulator when high pressure gas is being supplied to a property to be vented to the outside atmosphere safely, or would like to have a buried vault on the outside of the property concealing all of the equipment in a safe and corrosion free manner. The residents of my community are opposed to having the gas meters and regulators in front of their properties for the following reasons:

- **Vehicular damage to units-** (there have been 9 articles from our local newspaper about vehicles hitting and even driving through properties within our City over the past 2 years). There have also been other accidents that never made the newspaper - including two accidents that happened down the street from the home of an associate of mine within the last two years.
- **Snow Issues-** Living in an urban area always presents a problem with where to put your snow during inclement weather. When you live on a home that is only 15'-20' wide and you have a front door or steps in the front of your home taking some of the overall available width away from the front of your home...residents have no choice but to pile the snow in front of their homes which will block and potentially damage or freeze-up the meter set as these issues are cautioned of in §59.18 (a) (4) (iv) "falling objects, such as packed snow or ice from a roof" and (c){1} (ii) "Protection from ambient temperatures is necessary to avoid meter freeze-ups". I would also like to mention residents are prohibited from just shoveling all of the snow into the street, so they have no choice but to pile it up in front of their homes.
- **Trip Hazards -** The equipment in question, in many cases can be tripped on or have someone pushing a stroller or something hit these units.

- **Corrosion Issues-** Gas meter sets that were just installed by UGI within the last year are already rusting, showing signs of corrosion. Unfortunately over 60% of Allentown's properties are currently non-owner occupied building (rentals) many of which will not bother to paint the hardware to keep it in sound shape. The City has been working feverishly to de-convert and promote single family owner occupied ownership...but this process doesn't happen overnight.
- **Vandalism-** I live in an urban community where people are constantly walking on the sidewalks....this will always pose a risk of having someone "monkey" with the equipment or at least always make the resident fearful that someone will tamper with the equipment.
- **Misuses of the equipment-** People are chaining trash receptacles and commercial display racks to the gas hardware. I have also seen people securing their bicycles and motorcycles and other items to the equipment as well.
- **Shut off valves on pipe with regulator attached to it-** A great many of the units that UGI has installed have no locking mechanism on the valve, leaving the property owner extremely vulnerable that anyone could walk by their property with a wrench and shut their gas service off, potentially causing a pipe freezing issue in their home if nobody was home to identify a problem with the heating system. Also most of the properties already have curb shut off valves in the sidewalk that are protected from unauthorized people from tampering with them, and if a property doesn't have a curb valve, UGI should be installing one. Also, what if someone turns an unlocked gas valve off/on - if pilot lights are not relit the house can begin to fill up with gas and could cause an explosion itself.
- **Aesthetics-** Not only do the residents feel vulnerable for the reasons previously mentioned - but many people take great pride in maintaining and restoring properties within our Historic Districts and this equipment is just downright ugly directly in the front of people's homes. Keep in mind most of the properties that this will impact range between 15' -20' in total width and have no garden area in front of their property to be able to camouflage this equipment.

After reading the proposed changes Dockets L-2009-2107155 Annex A Title 52. Public Utilities Part I Public Utilities Commission Subpart C. Fixed Service Utilities Chapter 59. Gas Service §59.18 {Location of Meters.} Meter and Regulator location, I would like to point out a few things that I think need to be clarified to avoid confusion:

1. **C) Inside meter locations shall be considered only when: (1) (I) An acceptable outside location is not available due to the restrictions in federally approved Historic Districts or in high risk vandalism districts.**

First I would hope that this language could be changed to read just "Historic Districts" because many Historic Districts throughout Pennsylvania are not federally recognized, but state recognized. Allentown currently has (3) historic districts (Old Allentown, Old Fairgrounds and West Park) which are all recognized by the state of Pennsylvania as a CLG (Certified Local Government) and follow the Secretary of Interior's Standards. Allentown is the third largest city in the Commonwealth.

The (PHMC) Pennsylvania Historical and Museum Commission under the Municipalities Planning Code: which emphatically states in §603. (g) (2) {that} "zoning ordinances shall provide the protection of natural and historic features and resources" and the Historic District Act which authorizes municipalities to create historic districts....to protect the distinctive

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historical character of these districts and to regulate the erection, reconstruction, alteration, restoration, demolition or razing of buildings within the historic district.

In regards to "high risk vandalism districts" - what constitutes "high risk"? In my opinion any property located within an urban area is high risk based on the information I provided in this packet i.e. chained items to gas pipes, vehicular damage risk, trip hazards, potential vandalism, snow being piled against building facades, corrosion issues, unsecured gas valves being tampered with etc...

2. **(C) (1) (ii) Protection from ambient temperatures is necessary to avoid meter freeze-ups.**

I have yet to see UGI "protect" any outside meter set they have installed, and would think that if there is any chance of a meter freezing up, this supports the idea of keeping meters in basements of properties regardless of their location within a historic district.

3. **(a) (9) Meters and service regulators may not be installed in the following locations:**
(i) Directly beneath or in front of windows or other building openings which may be used as an emergency fire exit.

This alone would rule out any meter or regulator in front of 99% of the properties located in downtown Allentown, PA because most building range from 15' to 20' wide and obviously have a front door and anywhere from at least 1-2 window (on average) on the first floor elevation and typically have 1-2 basement windows and most have a grocer's alley door that leads between the town homes.... That being said we're not talking about a lot of real estate here, and a gas meter or regulator is virtually impossible to place under these conditions considering the size and layout of these properties. If someone needed to crawl out of their first floor window to escape a fire...they would be exposed to this equipment while exiting the burning building.

In closing I would thank you for your time and consideration and hope that you find this information helpful and ultimately rule that the gas meters and regulators can remain either in the basements with a gas vent which would allow the gas to vent in the atmosphere in the case of an emergency or in a buried vault outside.

Sincerely,



Patricia A. Jackson
Treasurer, Old Fairgrounds Neighborhood Association
Chairperson, Jordan Heights Project – Allentown, PA
Member, City of Allentown Historical Architecture Review Board