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March 7, 2016

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Rulemaking re Steam Heat Distribution System Safety Regulations,
52 Pa. Code Chapters 61 & 67,
Docket No. L-2015-2498111

Dear Secretary Chiavetta:

Enclosed for filing are the Comments of Veolia Energy Philadelphia, Inc. to the proposed rulemaking in the above-referenced matter. Copies are being served in accordance with the attached Certificate of Service. Thank you for your cooperation.

Very truly yours,

Barnett Satinsky

BS:mo
Enclosure

cc: Michael Smedley (*via email*)
Lindsey Sands, Esq. (*via email*)
Certificate of Service (*w/enclosure*)

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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RULEMAKING RE STEAM HEAT DISTRIBUTION :
SYSTEM SAFETY REGULATIONS, 52 Pa. Code : Docket No. L-2015-2498111
Chapters 61 and 67 :

COMMENTS OF VEOLIA ENERGY PHILADELPHIA, INC. TO PROPOSED
RULEMAKING RE STEAM HEAT DISTRIBUTION SYSTEM SAFETY REGULATIONS

Veolia Energy Philadelphia, Inc. ("VEPI") is the largest steam utility operating in the Commonwealth of Pennsylvania. Having participated in stakeholders meetings which led to the adoption of the proposed rulemaking regarding distribution system safety regulations, VEPI agrees with many of the proposed requirements, most of which VEPI already is performing on an operational level. However, certain edits are proposed in these comments, either for clarification and consistency.

Attached to these comments as **Appendix 1** is a marked copy of the proposed regulations containing VEPI's suggested edits. Many of the edits are self-explanatory, but some warrant a broader discussion. Of greatest concern is that the proposed rulemaking was intended to address distribution system safety regulations, but as proposed the regulations conflate issues of distribution system safety with that of plant safety. It is respectfully suggested that rules pertaining to distribution system safety be clearly separated from those pertaining to plant safety, either by adopting the proposed edits or by a more global rewriting of Chapter 61.

Comments on some other specific sections of the proposed regulations follow below.

GENERAL PROVISIONS

Suggested Comments to Sections 61.1, 61.11, and 61.12

Section 61.1 Definitions

To address VEPI's concern that the adopted regulations clearly distinguish between distribution system safety and general plant or facility safety, VEPI proposes two additional definitions set

for “steam distribution system” and “steam utility” to be used throughout to help make this distinction. VEPI has not noted in its summary explanations every use of these terms, but the attached redline highlights where VEPI suggests a clear distinction be made.

Section 61.11 Accidents

VEPI suggests changing the use of “may” in Section 61.11(c) to “shall” so that the steam utility clearly understands what type of injuries do not need to be reported. As written, “may” allows for uncertainty, ambiguity and discretion.

Section 61.12 Interruptions of Service

Section 61.12 and Section 67.1 seem to be addressing the same type of service outages; therefore, VEPI’s suggested changes make reference to Section 67.1 to clarify that the records to be kept under Section 61.12 are for those outages defined in Section 67.1. In addition, VEPI suggests that maintaining records for three years is more reasonable than six years, and three years also is consistent with the record-keeping requirements under Section 61.42 and Section 61.49.

SAFETY REQUIREMENTS

Suggested Comments to Sections 61.41 – 61.53

Sections 61.41 – 61.53 New Safety Requirement Regulations

Unless other highlighted herein, VEPI believes all of its comments to Sections 61.41 – 61.53 are self-explanatory and no further explanation is provided.

Section 61.44 – Operating and Maintenance Plan

Section 61.44(a) sets forth requirements for establishing an operations and maintenance plan that complies with the new safety requirements. To ensure compliance, VEPI requests an exact date by which such plan is required to be in place. In addition, Section 61.44(a) provides that any revisions to a plan shall be submitted at least 30 days prior to the effective date of the “original plan”. VEPI seeks clarification on whether this sentence is referring to the original plan to be filed by the to-be-determined date, or if the sentence is referring to subsequently revised plans. Perhaps the reference to “original plan” should be to “any revised plan”.

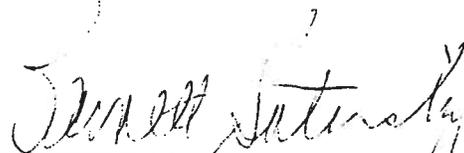
Section 61.50 Welding – Qualification and Nondestructive Testing

VEPI seeks further guidance on the mechanism required for pressure testing required in Section 61.50(a)(b). These clauses seem to be redundant, but also are not specific as to whether air testing or another method of nondestructive testing is required. In addition, VEPI recommends that pressure testing should not be required for new construction pipelines if it is able to perform X-rays of the field welds, as such X-rays will be sufficient to determine the strength of such welds, are safer to perform than pressure testing, and least intrusive to the distribution system.

Section 61.51 Steam Leaks and Steam Emergency Reports

VEPI's comment in Section 61.51(g) is meant to specify that the requirement to complete emergency reports and inspection does not apply to vaporization that simply occurs when a form of natural water, such as rain or groundwater, or when general vapor from the steam utilities distribution system, comes into contact with heated pipes. Such general vaporization does not indicate a steam main leak.

VEPI respectfully requests that the Commission review the foregoing comments and incorporate the attached edits when adopting the proposed regulations in final form.



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Attorney for Veolia Energy Philadelphia, Inc.

APPENDIX 1

ANNEX A
TITLE 52. PUBLIC UTILITIES
PART I. PUBLIC UTILITY COMMISSION
Subpart C. FIXED UTILITY SERVICES
CHAPTER 61. STEAM HEATING SERVICE

GENERAL PROVISIONS

§ 61.1. Definitions

The following words and terms, when used in this chapter, have the following meanings, unless the context clearly indicates otherwise:

* * * * *

Service line—The pipe connecting[Connecting distribution facilities or pipelines of]the utility main to the customer's piping. The point of service termination is the customer's property line, unless otherwise provided by contract. [Service lines may be of either of the following types:

(i) *Low pressure*—The distribution facilities or pipeline extension of the utility which connect a steam main in the public highway or right-of-way of the utility with the inlet connection of the service line of the customer.

(ii) *High pressure*—The distribution facilities or pipelines of the utility which connect the facilities of the utility with the service line of the customer.]

Service line of the customer—The pipe of the customer which extends from the [utility] service line termination point to the point of utilization.

Steam distribution system – the pipelines, distribution mains, service lines, expansion joints and other similar equipment used to distribute or furnish steam.

Steam Utility – Persons or corporations owning or operating equipment or steam distribution systems in the Commonwealth for distributing or furnishing steam to or for the public for compensation.

SERVICES AND FACILITIES

§ 61.11. Accidents.

(a) *General.* A ~~steam~~public utility shall submit a report of each reportable accident involving the facilities or operations of the public utility in this Commonwealth. The reports shall be addressed to the Secretary of the Commission.

(b) *Reportable accidents.* Reportable accidents are those involving utility facilities or operations which result in one or more of the following circumstances:

(1) The death of a person.

(2) Injury to a person sufficient that the injured person requires immediate treatment at a hospital emergency room or in-patient admittance to a hospital, or both[an employee on duty sufficient to incapacitate him from performing his ordinary duties for a period longer than 3 days].

(3) [Injury to a person other than an employee on duty sufficient to incapacitate the injured person from following his customary vocation, or mode of life, for a period of more than 1 day]An event that involves a release of steam from the steam facility, which results in estimated property damage, including the cost of lost steam, of at least \$50,000 in market value.

(4) An occurrence of an unusual nature, whether or not death or injury of a person results, which apparently will result in a prolonged and serious interruption of normal service.

(5) An event that results in an emergency shutdown of the steam facility.

(6) An occurrence of an unusual nature that is a physical or cyber-attack, including an attempt against cyber security measures as defined in Chapter 101 (relating to public utility preparedness through self-certification) which causes an interruption of service or over \$50,000 in damages, or both.

(c) *Exception.* Injuries, as defined in subsection (b)(1) and (2), may shall not include those suffered as a result of a motor vehicle accident with utility facilities unless a vehicle involved in the accident is owned by the utility or driven by a utility employee while on duty.

(d) Telephone reports. A report by telephone shall be made immediately to the Commission's Gas Safety Division after the utility becomes aware of an occurrence of a reportable accident under subsection (b)(1), (3), (4), or (5). A report by telephone shall be made within 24 hours after the utility becomes aware of a reportable accident under subsection (b)(2). [*Telegraphic reports.* A report by telephone or telegraph shall be made at once in the event of the occurrence of a reportable accident resulting in the death of a person, or in the event of an occurrence of an unusual nature-].

(d)](e) Written reports. A written report shall be made on Form UCTA-8 within 30 days of the occurrence of a reportable accident. For reportable accidents under subsection (b)(6), a utility may remove from Form UCTA-8 information that would compromise the security of the utility or hinder an active criminal investigation. Accidents reportable on forms required by the Bureau of Workers' Compensation, Department of Labor and Industry, or the United States Department of Transportation, Pipeline and Hazardous Materials Safety Administration, may be reported to the Commission by filing a copy of the forms in lieu of a report on Form UCTA-8, as long as the alternative forms, at a minimum, provide all of the following information [immediately following the occurrence of a reportable accident as defined in subsection (b). Accidents reportable to the Commission which reports are also required by the Bureau of Workmen's Compensation, Department of Labor and Industry, may be reported by transmitting a copy of the reports in lieu of a report on Form UCTA-8.]:

- (1) The name of the steam utility.
- (2) The date of the reportable accident.
- (3) The date of the report.
- (4) The location where the reportable accident occurred.
- (5) The name, age, residence, and occupation of the injured or deceased parties.
- (6) The general description of the reportable accident.
- (7) The name and telephone number of the reporting officer.

(f) Form availability. Blank UCTA-8 forms are available for download on the Commission's web site.

(g) Reports not exclusive. The reporting under this chapter is not limited to the requirements in this section and does not limit requests for additional information.

§ 61.12. Interruptions of service.

(a) Records. A steam ~~public-utility~~ shall keep a record of all steam service outages required to be reported under Section 67.1 which records shall include data showing the time, duration and cause of ~~an interruption of such~~ service outage (as defined therein)

affecting its entire steam distribution system or a major division of its steam distribution system. The records shall be preserved for a period of 63 years.

* * * * *

SAFETY REQUIREMENTS

§ 61.41. Purpose and Policy.

(a) The purpose of this section is to prescribe the minimum safety requirements for the design, fabrication, installation, inspection, testing, operation, and maintenance of steam distribution systems in the Commonwealth of Pennsylvania.

(b) All ~~public~~ steam utilities engaged in the distribution of steam via pipeline shall comply with the rules set forth in this section.

(c) The Commission will have the authority to inspect the steam distribution systems of ~~steam-public~~ utilities.

(d) This section does not apply to:

(1) Piping and facilities used for or in connection with the generation or production of steam.

(2) Piping downstream of the customer's property line.

§ 61.42. Safety and compliance with standard code.

(a) *Responsibility.* A steam utility shall at all times use every reasonable effort to properly warn and protect the public from danger, and shall exercise reasonable care to reduce the hazards to which employees, customers, and others may be subjected to by reason of its ~~equipment or facilities~~ ownership, operation and/or maintenance of the steam distribution system.

(b) *Standard Code.* Steam distribution ~~pipeline facilities~~ systems installed after the effective date of this regulation shall be designed, constructed, tested, operated, and maintained in accordance with the most updated and applicable standards of the American Society of Mechanical Engineers, <https://www.asme.org/>~~https://www.asme.org/~~, Two Park Avenue, New York, NY 10016-5990. The Commission ~~has the~~ shall exercise reasonable discretion to determine whether a redesign, repair, modification, or replacement of a ~~facility~~ steam distribution system constitutes a new ~~facility~~ subject to steam distribution system for purposes of these regulations.

(c) A steam utility shall comply with the Underground Utility Line Protection Act ("PA One Call" or "Act 287") at 73 P.S. §176 et. seq. (relating to excavation and demolition).

(d) Enforcement. A steam utility shall be subject to inspections as may be necessary to assure compliance with this section. The facilities, books, and records of a steam utility shall be accessible to the Commission and its staff for the inspections. A steam utility shall provide the Commission or its staff with the reports, supplemental data, and information requested by the Commission staff to administer and enforce this section.

(e) Records. A steam utility shall keep adequate records as required for compliance with this subsection for 3 years. The records shall be accessible to the Commission and its staff.

§ 61.43. Notification of major construction.

A steam utility shall notify the Commission and the Gas Safety Division of proposed major construction, reconstruction, or maintenance of its facilities at least 30 days prior to the commencement of work. Major construction, reconstruction, or maintenance is defined for this reporting as a single project involving an expenditure in excess of \$300,000 or 10% of the cost of the utility's plantsteam distribution system in service, whichever is less. This notification of proposed construction shall include all of the following:

- (1) Description and location (city, township, county) of proposed work.
- (2) Type of facility (for example, distribution mains, service lines, expansion joints, and the like).
- (3) Estimated starting date.
- (4) Estimated completion date.
- (5) Design pressure.
- (6) Estimated cost.
- (7) Name and address of reporting steam distribution-utility.
- (8) Name, address and telephone number of person to be contacted regarding the project.
- (9) Notification to the Commission of the completion date.

§ 61.44. Operating and maintenance plan.

(a) ABy [DATE], a steam utility shall establish and file with the Secretary of the Commission and the Gas Safety Division a detailed, written operating and maintenance plan for complying with all provisions of this chapter. Revisions to a plan shall be submitted at least 30 days prior to the effective date of the original plan.

(b) The operating and maintenance plan shall include, at a minimum, all of the following:

(1) Detailed instructions for employees covering operating and maintenance procedures during normal operations and repairs.

(2) Procedures for welding, brazing, and welder qualifications.

(3) Procedures for reporting, investigating, classifying, handling, and monitoring steam leaks.

(4) Procedures to correct, within specified timeframes, deficiencies found during inspections, evaluations, tests, and the like required by this chapter.

(5) Procedures for continuing surveillance of steam facilities to determine and take appropriate action concerning failures, leakage history, and other unusual operating and maintenance conditions.

(6) An established list of qualified persons who exclusively may approve the turn-on of any section of the steam distribution system.

(7) Procedures to ensure that the turn-on of any section of the steam distribution system is accomplished only by persons specifically trained, qualified, and approved for that purpose.

(c) A steam utility shall adhere to its operating and maintenance plan filed with the Commission.

§ 61.45 Security planning and emergency contact list.

(a) A steam utility shall develop and maintain written plans for physical and cyber security, emergency response, and business continuity in accordance with 52 Pa. Code § 101.3 (relating to security plan requirements).

(b) Within its Chapter 101 emergency response plan, a steam utility shall provide procedures for all of the following:

(1) The availability of personnel, equipment, tools, and materials, as needed at the scene of an emergency.

(2) Actions directed toward protecting people first, and then property.

(3) Emergency shutdown in any section of the pipeline steam distribution system necessary to minimize hazards to life or property.

(4) Making safe any actual or potential hazard to life or property.

(5) Safely restoring any main or service outage in the steam distribution system.

(c) During January of each year, a steam utility shall file with the Commission's Secretary and the Gas Safety Division a list of the utility's responsible officials who may be contacted in the event of an emergency. The steam utility shall serve this list on all municipalities within which its facilities are located. Revisions to this list within the year shall be immediately reported to the Gas Safety Division and affected municipalities.

§ 61.46 Customer education and information program.

(a) A steam utility shall initiate and maintain, on a continuing basis, a satisfactory program for customer education and information designed to assist its customers and

appropriate governmental organizations to recognize steam emergency conditions and situations and to notify the steam utility of those emergency situations.

(b) The program and the ~~medi~~communication used must be as comprehensive as necessary to reach all customers.

(c) During January of each year, a steam utility shall file with the Commission's Secretary and the Gas Safety Division a current description of its customer education and information program, including a detailed statement of the means of its implementation and samples of all descriptive literature and other educational aids.

§ 61.47. Employee training.

(a) ~~An~~Every employee and supervisor involved in the operation, maintenance, or testing of steam ~~pipelines and related facilities~~distribution systems (or any part thereof) shall satisfactorily complete annual training at all progression levels to ensure effective and safe implementation of the procedures required by this chapter. Every employee and supervisor shall receive annual training.

(b) ~~A new employee~~(b) A new employee of the steam utility who will be involved in the operation, maintenance, or testing of steam distribution systems (or any part thereof) shall receive basic classroom training prior to on-the-job training in field operations.

§ 61.48. Periodic inspections.

(a) Steam traps and trap piping assemblies shall be inspected by the steam utility for general condition and proper operation at least three times each calendar year.

(b) Blow-off valves shall be checked for operability immediately prior to closing each associated main valve during a scheduled shutdown of a section of the steam distribution pipeline system. Removal of condensate from a shutdown section of pipeline must be accomplished prior to reopening main valves.

(c) Accessible expansion joints shall be inspected at least twice annually. The inspection shall include checks for leakage, proper alignment and traverse measurement.

(d) Service valves owned by the steam utility located within the customer's building shall be inspected at least once annually.

(e) Manholes owned by the steam utility ~~containing~~located within the steam ~~facilities~~distribution system shall be inspected for general conditions and adequacy of insulation at least once annually.

(f) Remote system pressure indicating devices shall be inspected and tested for accuracy at least once every 2 years. At a minimum, pressure indicating gauges shall be installed at the interface between portions of the steam distribution system which are designed for different operating pressures.

§ 61.49. Records.

A steam utility shall maintain records documenting inspections, maintenance, tests, and all other matters required by this chapter for at least 3 years. All records and copies shall be kept on file in the Commonwealth of Pennsylvania at the steam utility's offices and be readily accessible to Commission staff.

§ 61.50. Welding – qualification and nondestructive testing.

(a) Welding shall be performed by qualified welders employing qualified welding procedures. Welders and welding procedures shall be qualified in accordance with the most updated and applicable standards of the American Society of Mechanical Engineers, <https://www.asme.org/>, Two Park Avenue, New York, NY 10016-5990.

(b) Field welds that are inaccessible or not in a manhole on new steam pipelines shall be nondestructively tested. The new pipeline using x-ray, or if unable to use x-ray, shall be pressure tested at the system operating pressure.

(c) New construction pipelines shall be pressure tested to 1.5 times the maximum allowable operating pressure.

(d) Field welds made on existing steam pipeline facilities distribution systems shall be subject to a program of random unannounced nondestructive testing to assess the quality of welding and test the work of each welder. The required minimum testing rate shall be 10% of all welds made during a calendar year. If 10% or more of the welds tested in a calendar year are found to be unacceptable, the test rate shall increase by five percent for the ensuing calendar year. If fewer than 10% of the welds are found to be unacceptable in a year where the required test rate was greater than 10%, the test rate may be decreased by 5% for the ensuing calendar year.

§ 61.51. Steam leaks and steam emergency reports.

(a) Emergency leaks require an immediate response to protect life and property and shall be worked continuously until repairs are completed or until the condition is no longer hazardous. An emergency leak includes any leak which could cause property damage or personal injury or any leak which, in the judgment of the operating personnel at the scene, is regarded as potentially hazardous.

(b) Nonemergency leaks include any leak which is not immediately hazardous at the time of discovery and can be reasonably expected to remain that way. Nonemergency leaks shall be reexamined within 6 months from the date of discovery, and repaired within a reasonable time.

(c) A steam leak record, identified by number, shall be used to depict the entire history of a leak from the time of discovery through repair. The record must contain information as to the nature of the repair.

(d) A steam utility shall record data and compile a written report of each steam leak and steam emergency leak, as defined in subsection (a).

(e) An event log shall be kept and maintained on file recording the receipt and handling of each event and must contain all of the following information:

(1) The location of leak or emergency.

(2) The time the report is first received.

(3) A description as to type of leak or emergency.

(4) The time personnel are first dispatched to the location.

(5) The time of arrival of personnel at the location.

(6) The times of dispatch and arrival of any additional personnel called to the location.

(f) A steam utility shall have available for inspection by the Commission's Gas Safety Division, on or before the 16th30th day of each calendar month, a summary analysis of its performance in responding to reports of steam leaks and emergencies.

(g) For purposes of this Section 61.51, a leak shall mean a leak that is sufficient enough to produce a visible vapor condition, and not general vaporization caused by water infiltration of rain or ground water or vapor produces from typical steam trap discharge]

§ 61.52. Facility Steam distribution system failure investigation.

(a) A steam utility shall establish procedures to analyze each failure that causes injury or damage for the purpose of determining its cause and to minimize the possibility of recurrence. The procedures must include a method to select samples of the failed facility steam distribution system or equipment for laboratory examination when necessary.

(b) The procedures shall provide for complete cooperation with Commission staff, including using independent consultants, approved by the steam utility, in testing or surveying equipment or systems deemed necessary by staff or the consultants for the investigation and analysis of a failure or accident to determine its cause and to minimize the possibility of recurrence.

(c) A facility steam distribution system failure occurs when the facility steam distribution system fails to perform the function it was designed for.

§ 61.53 Asbestos control.

(a) A steam utility shall have procedures to safely manage and abate asbestos materials from accessible manholes, vaults, and other areas that contain steam facilities.

(b) A steam utility shall have emergency procedures to control and eliminate asbestos -contaminated debris resulting from the failure of a the steam pipeline or facility distribution system.

(c) A steam utility shall have a program to maintain, in safe condition, asbestos materials on exposed piping and fittings in the steam distribution system and to eliminate asbestos materials to the extent practicable and feasible.

(d) The procedures must comply with applicable rules and regulations regarding the removal, handling, and disposal of asbestos materials.

CHAPTER 67. SERVICE OUTAGES

§ 67.1. General provisions.

(a) Electric, gas, water, steam, and telephone utilities holding certificates of public convenience under 66 Pa.C.S. § § 1101 and 1102 (relating to organization of public utilities; and beginning of service and enumeration of acts requiring certificate) shall adopt the following steps to notify the Commission with regard to unscheduled service interruptions.

(b) All electric, gas, water, steam, and telephone utilities shall notify the Commission when 2,500 or 5.0%, whichever is less, of their total customers have an unscheduled service interruption in a single event for 6 or more projected consecutive hours. A service outage report shall be filed with the Commission within 10 working days after the total restoration of service. Where storm conditions cause multiple reportable interruptions as

defined by this section, a single composite service outage report shall be filed for the event. Each report must contain the following information:

- (1) The approximate number of customers interrupted during the event.
- (2) The approximate number of trouble cases for each county affected during the event. Trouble cases are non-outage cases such as primary and secondary line-down calls and emergency calls.
- (3) The approximate number of outage cases for each county affected during the event.
- (4) The number of outage cases exceeding 6 or more hours in duration.
- (5) A listing of each outage case exceeding 6 or more hours in duration, including the following:
 - (i) Approximate geographic location (county, city, municipality or township).
 - (ii) Total number of customers affected.
 - (iii) Duration of the outage.
 - (iv) Initial date and time of the outage.
 - (v) Restoration time and date.
- (6) The reason for the interruption.
- (7) The projected time for service restoration of the event.
- (8) A listing of the number of utility workers assigned specifically to the repair work by general function, that is linemen, trouble men, tree crew, and the like.
- (9) A listing of the number of contract workers assigned specifically to the repair work by company and by general function, that is linemen, trouble men, tree crew, and the like.
- (10) A listing of the number of workers received as mutual aid by company and by general function, that is linemen, trouble men, tree crew, and the like.
- (11) The date and time of the first information of a service interruption.
- (12) The date and time that repair crews were assembled.
- (13) The actual time that service was restored to the last affected customer.
- (14) A general description of the physical damage sustained by the utility facilities as a result of the event. The description must include facilities replaced due to damage and a listing of the number of poles, transformers, spans of wire, pipes or valves replaced.
- (15) For weather-related events, the utility's weather reports, outlooks or scenarios for the day before and the day of the interruption event.
- (16) For all interruption events that caused outages to more than 10% of customers in the utility's service territory, and to the best of the utility's ability to access historical data, the historical ranking of the event in terms of the number and duration of outages and examples of two comparable events, including the number and duration of outages for those comparable events.

(c) In addition to the requirements of subsection (b), the utility shall notify the Commission by telephone within 1 hour after preliminary assessment of conditions reasonably indicates that the criteria listed in subsection (b) may be applicable. Subsection (b)(1), (3), (6) and (7) shall be used as guidelines for the telephone report. The Commission will maintain telephone lines for this purpose and will notify each utility of

the numbers to be called. Blank outage reporting forms are available for download on the Commission's web site.

(d) The Commission will implement a plan to govern its internal operations in receiving notification of service interruptions, in investigating such interruptions, and in assisting the customers of the utility, the utility and Commonwealth agencies in restoring service.

(e) All electric, gas, water, steam, and telephone utilities shall list in the local telephone directories of their service areas, and on their web sites, a telephone number to be used during normal operating hours and an emergency telephone number to be used 24 hours in emergency service situations.

(f) As defined in subsection (b), the service outage report must contain the required information except for the following utilities:

(1) Gas and steam utilities are not required to submit the information under subsection (b)(2), (5), (14), (15) and (16).

* * * * *

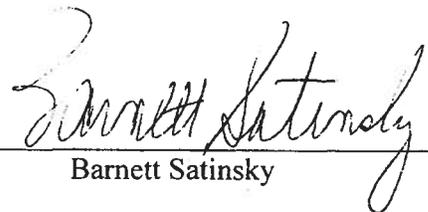
BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RULEMAKING RE STEAM HEAT DISTRIBUTION :
SYSTEM SAFETY REGULATIONS, 52 Pa. Code : Docket No. L-2015-2498111
Chapters 61 and 67 :

CERTIFICATE OF SERVICE

I hereby certify that this 7th day of March, 2016, I served a copy of the foregoing
Comments of Veolia Energy Philadelphia, Inc. to the Proposed Rulemaking re Steam Heat
Distribution System Safety Regulations upon the persons listed below in the manner indicated in
accordance with the requirements of 52 Pa. Code Section 1.54:

Rosemary Chiavetta, Secretary Pennsylvania Public Utility Commission PO Box 3265 Harrisburg, PA 17105-3265 <i>(Via e-Filing)</i>	Office of Consumer Advocate 555 Walnut Street 5th Floor Forum Place Harrisburg, PA 17101-1923 <i>(Via Federal Express)</i>
Bureau of Technical Utility Services Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street Harrisburg, PA 17120 <i>(Via Federal Express)</i>	Office of Small Business Advocate 300 North Second Street, Suite 202 Harrisburg, PA 17101 <i>(Via Federal Express)</i>
Bureau of Investigation and Enforcement Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street Harrisburg, PA 17120 <i>(Via Federal Express)</i>	


Barnett Satinsky