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March 15, 2022



Ms. Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, PA 17120

RE: Comments on Docket Number L-2019-3010267, Notice of Proposed Rulemaking Order (NOPR)

Dear Secretary Chiavetta,

I am writing in response to the request for comments regarding the modification of Chapter 59 to enable more comprehensive regulations of public utilities that transport petroleum products and other hazardous liquids in intrastate commerce, as found in the above-referenced NOPR, published in the Pennsylvania Bulletin on February 12, 2022.

As a person who submitted comments on the proposed changes in the Advanced Notice of Proposed Rulemaking Order that was published in the Pennsylvania Bulletin on June 29, 2019, I received notice via email when the revised NOPR was posted on the Commission's website under Docket Number L-2019-3010267 on July 15, 2021. Although I did not receive an email, I also noticed when the Errata and corrected Annex and Notice were posted, on August 17 and 18, 2021, and that the July version was removed, although the date of service remained the same on the Order. These events occurred almost two full years after the close of comments on the ANOPR on September 11, 2019.

The Proposed Rulemaking generated some level of interest among the community of corrosion control professionals, of which I have long been a part, even those who do not follow the normal promulgation and comment procedure followed by the Commonwealth. I'm sure that many of us, like I was, were following the advice offered in your letter of September 28, 2019, when you instructed another commenter to

"follow the progression of this Rulemaking on the Commission's website at [www.puc.pa.gov](http://www.puc.pa.gov) by clicking onto "Search for Documents" on the opening page, and then typing in the docket number and hit "search." You may then review all filings associated with this Rulemaking."

We were thus disappointed to discover that, although little has changed on the Commission's website since August, the Pennsylvania Bulletin notice had been published on February 12 of this year, a event that we have been previously informed starts the clock on the new Public Comment period. According to my calculation, the deadline for public comments is now April 13, 2022, a mere 29 days from today.

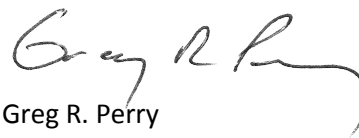
And yet, the Commission's Docket Number L-2019-3010267 website had exhibited no change. In the Case Summary, the Date Posted remains 05/31/2019. There is no indication that an event of any significance has occurred. The most recent item in the listed Daily Actions is from November of 2021. There is no copy of the Pennsylvania Bulletin Notice, as was the case in 2019. I have not been able to

compare the notice published in the Pennsylvania Bulletin to the August 2021 posted version, because the digital formats are different and a comparison must be completed by hand. The length of time that has occurred between August 2021 and February 2022 makes me concerned that the offices of Pennsylvania government that have reviewed the NOPR have made some changes. There may be many interested parties to this Rulemaking who are still unaware.

For these reasons, I request that you post a notice on the Commission's website that the NOPR has been published, that the public comment period has begun, and the deadline for submitting public comments. Furthermore, I request an extension of time for the public to submit comments, preferably in the range of 60 days after your notice is posted.

I appreciate the opportunity to comment of the regulations being developed by the PUC, and support your efforts to safeguard the public and the environment. I intend to post addition comments on the substance of the proposed changes to the regulations in the near future.

Yours truly,

A handwritten signature in black ink, appearing to read "Greg R. Perry", with a long, sweeping horizontal line extending to the right.

Greg R. Perry  
NACE CP Specialist #4419