

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's	)	
Review of the Gas Pipeline Safety Rules	)	
in Chapter 4901:1-16 of the Ohio	)	Case No. 19-047-GA-ORD
Administrative Code	)	

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**REPLY COMMENTS OF THE OHIO GAS ASSOCIATION**

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The Ohio Gas Association (“OGA”) is a natural gas trade organization which represents over 30 natural gas distribution companies and cooperatives in Ohio.<sup>1</sup> The rules under review in this docket directly impact OGA member companies.<sup>2</sup> Pursuant to the August 14, 2019 and August 30, 2019 Entries in this docket, the OGA respectfully submits these Reply Comments for consideration by the Public Utilities Commission of Ohio (“Commission”).

OGA reviewed the Public Comments as well as the letter from the Village of Evendale. OGA appreciates the safety concerns raised in their respective comments. While these comments originate from good intentions, OGA believes there will be many unintended material consequences to implementing many of the suggestions. The impacts of any rule changes suggested in these comments also need cost-benefit scrutiny. Additionally, the comments contain concepts that are better suited for the Ohio Power Siting Board rules rather than the Gas Pipeline Safety rules. Finally, the comments suggest requirements that would exceed those under the federal Pipeline and Hazardous Materials

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<sup>1</sup> See <https://www.ohiogasassoc.org/about-oga/mission-statement/>

<sup>2</sup> OGA member companies are “operators” under Ohio Admin. Code 4901:1-16-01(P).

Safety Administration (“PHMSA”) rules. The PHMSA rules are not the skeletal, rudimentary standards portrayed in these comments. Rather, these federal standards are feasible to comply with, well-developed, and time-tested.

For these reasons, and because much of these comments lack any proposed rule language, OGA does not have sufficient detail to respond. OGA recommends the Commission schedule a workshop or other forum to address these safety concerns, to the extent the Commission believes these comments have merit.

Finally, OGA has no reply comments to the comments submitted by Northeast Ohio Natural Gas Company or Energy Transfer.

Respectfully submitted,

/s/ Devin D. Parram

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**CERTIFICATE OF SERVICE**

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/s/ Devin D. Parram  
Devin D. Parram

**Attorney for  
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Summary: Reply Comments of The Ohio Gas Association electronically filed by Teresa Orahood on behalf of Devin D. Parram