



**Danielle M. McGrath**, President

**Mindy Westrick Brown**, Vice President

- ▶ AES Indiana
- ▶ Boonville Natural Gas Corp.
- ▶ CenterPoint Energy
- ▶ Citizens Energy Group
- ▶ Community Natural Gas Co., Inc.
- ▶ Duke Energy Indiana
- ▶ Fountaintown Gas Co., Inc.
- ▶ Indiana Michigan Power
- ▶ Indiana Natural Gas Corp.
- ▶ Midwest Natural Gas Corp.
- ▶ Northern Indiana Public Service Co.
- ▶ Ohio Valley Gas Corp.
- ▶ South Eastern Indiana Natural Gas Co., Inc.
- ▶ Sycamore Gas Co.

May 13, 2022

Mr. Jeremy Comeau  
Indiana Utility Regulatory Commission  
101 W. Washington Street  
Suite 1500 East  
Indianapolis, Indiana 46204

Dear Mr. Comeau:

On behalf of the Indiana Energy Association (IEA), I would like to thank you for the opportunity to work through the strawman document related to 170 IAC 5-3 with Pipeline Safety Division (PSD). The members of the IEA take pipeline safety seriously, and this is a matter of which to give considerable thought and attention. The IEA would kindly request that if the PSD feels it is necessary to incorporate the new federal rules at this time that the proposed rulemaking be limited to adoption of the federal rules only. The federal rules are comprehensive in nature. The IEA would also encourage PSD to research whether generic language incorporating all current and future federal rules could be adopted to prevent the need for future rulemakings.

Upon preliminary review, there are concerns that the more stringent rules proposed may actually have adverse implications in some instances. Should PSD insist on moving forward with something more than an incorporation of current and future federal rules, the IEA would kindly request that PSD grant the IEA request from April 29, 2022, which was a 90 day extension so that the IEA can articulate the significant costs and changes to operations proposed. The IEA remains committed to pipeline safety and believes the incorporation of the federal rules will keep Indiana in good standing.

Info@IndianaEnergy.org  
317.632.4406  
IndianaEnergy.org  
One American Square  
Suite 1600  
Indianapolis, Indiana 46282

Sincerely,

A handwritten signature in black ink, appearing to read 'MWB', with a long horizontal flourish extending to the right.

Mindy Westrick Brown  
Vice President

MWB/djf