



February 19, 2025

Honorable Brian Stewart
Chairman, Finance Committee
Ohio House of Representatives
77 South High Street, 13th Floor
Columbus, Ohio 43215

Re: House Bill 54

Dear Chairman Stewart and committee members:

On behalf of the Ohio Gas Association (“OGA”), please find below my testimony on House Bill 54, Ohio’s biennial transportation budget. OGA is a natural gas trade organization which represents over 30 natural gas distribution companies and cooperatives in Ohio.¹

For the reasons explained below, OGA submits testimony opposing language related to the abandonment of telecommunications and utility structures.

There are several key reasons why OGA opposes such provisions:

Resource Allocation Impact: Enforcing the removal of abandoned lines as mandated by these provisions will divert significant resources, including time, manpower, equipment, and financial investment, from vital initiatives aimed at expanding and improving Ohio’s infrastructure. These resources would be better allocated to building new systems to serve the growing needs of Ohioans, rather than focusing on the costly and time-consuming process of removing abandoned infrastructure for an undetermined benefit to the public or customers. OGA is unaware of significant issues with ODOT related to abandoned infrastructure and is uncertain why a legislative fix is needed.

OGA also opposes language that would leave complete, unilateral discretion to ODOT without any limits on the remediation that ODOT might require. This concern is aggravated by the unlimited and difficult to budget financial ramifications to telecommunications and utility companies impacted by this bill. This issue is further made worse by a lack of language that would require removal to be tied to an actual ODOT project.

Damages to Existing Infrastructure: The removal of abandoned lines can lead to significant damage to not only the roadways but also other critical infrastructure that may be located adjacent to or beneath them. These unintended consequences could result in substantial remediation costs that could far exceed the expected benefits of removing the structures. Repairing these damages would further drain resources and delay other essential projects.

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

Safety and Collaboration: Safety remains the highest priority for OGA members. OGA is actively engaged in collaborative efforts, such as those through the Ohio Underground Damage Prevention Coalition (OUDPC), to identify and implement solutions for issues, including abandoned lines. OGA strongly believes that this ongoing process will yield more thoughtful, comprehensive, and effective solutions, which will ultimately help reduce damages and increase safety across the state. OGA urges that this process be allowed to continue developing, so we can reach a consensus that best serves all stakeholders.

Given these concerns, OGA respectfully opposes language related to abandonment of telecommunications and utility structures, and instead favors further collaborative efforts to address these important issues in a more comprehensive manner. Currently, there are similar discussions taking place with the Abandoned Lines Subcommittee of the OUDPC. That committee brings contractor, gas, electric, PUCO and OHIO811 leadership experience to that discussion, with a committee open to all governmental, contractor and utility types. The Abandoned Lines Subcommittee is progressing toward finding suitable language that can be agreed upon and supported by the OUDPC that can be moved forward for legislative changes. With progress being made at that level, with input from excavators at the contractor and utility level, we feel it is important for those voices to be heard and to allow the positive work from this committee to play out to completion. While ODOT has never approached OGA about its concerns with abandoned facilities, OGA would be pleased to collaborate with ODOT in that process.

Thank you for your time and consideration. We appreciate your attention to this matter and your commitment to improving Ohio's infrastructure and safety.

Sincerely,

A handwritten signature in blue ink that reads "Jimmy Stewart". The signature is written in a cursive, flowing style.

Jimmy Stewart
President, Ohio Gas Association