BLANK ROME LLP
COUNSELORS AT LAW

Phone: *(215) 569-5793*
Fax: *(215) 832-5793*
Email: *lewis@blankrome.com*

May 8, 2014

VIA FEDEX OVERNIGHT

Rosemary Chiavetta, Secretary
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Re: Amended Petition of Sunoco Pipeline, L.P. for a Finding That The Situation of Structures to Shelter Pump Stations and Valve Control Stations Is Reasonably Necessary for the Convenience or Welfare of the Public
Docket No. P-2014-2411966

Dear Secretary Chiavetta,

Enclosed please find the Amended Petition of Sunoco Pipeline, L.P. for a Finding That The Situation of Structures to Shelter Pump Stations and Valve Control Stations Is Reasonably Necessary for the Convenience or Welfare of the Public related to the above docket number.

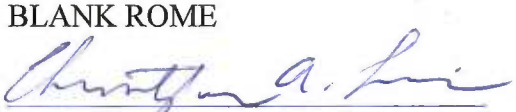
This Amended Petition amends the Petition previously filed on March 21, 2014, which was collectively captioned at separate Docket Numbers as follows: P-2014-2411941, 2411942, 2411943, 2411944, 2411945, 2411946, 2411948, 2411950, 2411951, 2411952, 2411953, 2411954, 2411956, 2411957, 2411958, 2411960, 2411961, 2411963, 2411964, 2411965, 2411966, 2411967, 2411968, 2411971, 2411972, 2411974, 2411975, 2411976, 2411977, 2411979, 2411980. Sunoco Pipeline, L.P. is now filing individual and separate petitions as they relate to each docket.

A copy has been served in accordance with the enclosed certificate of service. Out of an abundance of caution, Sunoco Pipeline, L.P. is serving each Amended Petition to all parties and all persons who were served the original Petition or listed on the dockets as persons of interest. This procedure is being followed in an effort to preserve each person's right to make filings

respecting the particular docket(s) in which they assert an interest. I sincerely regret any inconvenience caused by the service of those Amended Petitions that may not be of interest to certain recipients. If you have any questions, please do not hesitate to contact me.

Sincerely yours,

BLANK ROME



Christopher A. Lewis (ID #29375)
Blank Rome LLP
One Logan Square
Philadelphia, PA 19103
Phone: (215) 569-5793
Counsel for Sunoco Pipeline, L.P.

cc: Administrative Law Judge Elizabeth H. Barnes (via First-Class Mail and E-Mai)
Administrative Law Judge David A. Salapa (via First-Class Mail and E-Mail)
Certificate of Service

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Amended Petition of Sunoco Pipeline L.P. for a Finding That The Situation of Structures to Shelter Pump Stations and Valve Control Stations is Reasonably Necessary for the Convenience or Welfare of the Public	:	Docket No. P-2014-2411966 (West Goshen Township, Chester County)

AMENDED PETITION OF SUNOCO PIPELINE, L.P.
FOR A FINDING PURSUANT TO 53 P.S. § 10619
(West Goshen Township, Chester County)

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Sunoco Pipeline, L.P. ("SPLP") hereby petitions the Pennsylvania Public Utility Commission ("Commission" or "PUC"), pursuant to 52 Pa. Code § 5.41 and Section 619 of the Municipalities Planning Code (the "MPC"), 53 P.S. § 10619, for a finding that structures to shelter a pump station in West Goshen Township, Chester County are reasonably necessary for the convenience and welfare of the public and, therefore, exempt from any local zoning, subdivision, and land development ("Zoning Petition").[1]

In support of this Zoning Petition, SPLP avers as follows:

[1] SPLP is filing, together with this petition, additional petitions that pertain to pipelines on which service has been temporarily suspended, as explained herein. *See* Docket Nos. P-2014-2411941, 2411943, 2411945, 2411965, 2411966, 2411968, 2411971, 2411972, 2411974, 411975, 2411976, 2411977. SPLP is also concurrently filing petitions that pertain to pipeline segments on which certain service has been abandoned, as explained herein. *See* Docket Nos. P-2014-2411942, 2411944, 2411946, 2411948, 2411950, 2411951, 2411952, 2411953, 2411954, 2411956, 2411957, 2411958, 2411960, 2411961, 2411963, 2411964, 2411967, 2411979, 2411980. SPLP expressly requests that these dockets remain unconsolidated.

I. INTRODUCTION

1. Since 2002, SPLP has been a public utility corporation regulated by the Commission, offering petroleum products and refined petroleum products pipeline transportation service within Pennsylvania, subject to the Commission's oversight and jurisdiction.

2. This Zoning Petition relates to SPLP's Mariner East pipeline project and, more specifically, to the segment of the existing pipeline that lies east of Mechanicsburg in West Goshen Township, Chester County. The Mariner East project is an approximately 300-mile project that will make use of SPLP's existing pipeline infrastructure, supplemented by construction of an additional 51-mile extension from Houston, Pennsylvania to Delmont, Pennsylvania, to ship valuable natural energy resources from the Marcellus Shale in Pennsylvania to the Marcus Hook Industrial Complex ("MHIC") on the Delaware River and SPLP's Twin Oaks facilities operated in conjunction with MHIC. A map showing the route of the Mariner East pipeline is attached hereto as **Exhibit "A"**.

3. For the segment of the pipeline infrastructure that lies east of Mechanicsburg (shown on Exhibit "A" in a blue color), SPLP presently holds a certificate of public convenience to provide petroleum products and refined petroleum products pipeline transportation service. As explained more fully below, SPLP will be resuming intrastate transportation service along this segment, so that propane can be shipped by truck from the Marcellus Shale region to Mechanicsburg, where it can then be transferred to the pipeline for further transportation to SPLP's Twin Oaks facilities and thereby allowing further distribution to multiple third-party storage facilities or distribution terminals located within Pennsylvania. This service will allow SPLP to meet the heightened demand for intrastate transportation of propane in the Commonwealth that arose from severe supply shortages of propane that Pennsylvania

experienced this past winter, when temperatures plummeted and demand for propane shipments overwhelmed inadequate shipment capacity. Upon completion of the construction of the pipeline segment from Houston, Pennsylvania to Delmont, Pennsylvania, SPLP also will provide intrastate transportation service of propane from Houston, Pennsylvania to its Twin Oaks facility for further distribution to multiple storage facilities or distribution terminals located within Pennsylvania.

4. As part of the Mariner East project, SPLP will be installing new pumps and valves stations at various locations along the pipeline. Under well-settled law, local municipalities have no authority to regulate the design, location, or construction of these facilities. *See Duquesne Light Co. v. Monroeville Borough*, 449 Pa. 573, 580, 298 A.2d 252, 256 (1972) ("This Court has consistently held, however, that the Public Utility Commission has exclusive regulatory jurisdiction over the implementation of public utility facilities.") (citations omitted).[2]

5. To protect the pump and valve stations from the elements, facilitate maintenance, dampen any ambient noise, and create a more aesthetic appearance, SPLP will house the equipment within structures that resemble residential storage sheds. *See* **Exhibit "B"**. Because local municipalities might contend that these structures are "buildings" rather than facilities, SPLP is filing this Zoning Petition as a precaution in the event that the Commission were to

[2] *See also County of Chester v. Phila. Elec. Co.*, 420 Pa. 422, 218 A.2d 331 (1966) (holding that regulation by a multitude of jurisdictions would result in "twisted and knotted" public utilities with consequent harm to the general welfare); *Newtown Twp. v. Phila. Elec. Co.*, 594 A. 2d 834, 837 (Pa. Commw. Ct. 1991) (noting that "it is clear that no 'implied' power exists in the MPC which would allow the Township to regulate [the Philadelphia Electric Company] through its subdivision and land development ordinance"); *Heintzel v. Zoning Hearing Bd. of Millcreek Twp.*, 533 A.2d 832 (Pa. Commw. Ct. 1987) (holding that township had no power to regulate, under its zoning ordinance, city's erection of water tower because that power was under the exclusive jurisdiction of the PUC).

determine that the structures are not facilities and not exempt from local zoning ordinances absent a finding from the Commission under 53 P.S. § 10619.

II. DESCRIPTION OF THE PETITIONER

6. The name and address of the Petitioner are:

Sunoco Pipeline, L.P.
Attention: Kathleen Shea-Ballay
1818 Market Street, Suite 1500
Philadelphia, PA 19103
Phone: 215-977-3565
Fax: 866-244-8696

7. Petitioner's counsel are:

Christopher A. Lewis, Esq.
Michael L. Krancer, Esq.
Frank L. Tamulonis, Esq.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103
Phone: 215-569-5500
Fax: 215-832-5535

SPLP's attorneys are authorized to receive all notices and communications regarding this Zoning Petition.

8. SPLP is a "public utility" as defined in Section 102 of the Pennsylvania Public Utility Code, 66 Pa. C.S. § 102, and a "public utility corporation" as the term is used in the MPC because SPLP currently holds multiple Certificates of Public Convenience ("CPCs") issued by the Commission pursuant to Sections 1101 and 1102 of the Public Utility Code, 66 Pa. C.S. §§ 1101 and 1102 which authorize shipments of petroleum and petroleum products by pipeline in Pennsylvania.

9. SPLP is a Texas limited partnership formed in 2001 as part of the restructuring of certain subsidiaries of Sunoco, Inc., and is indirectly, wholly-owned by Sunoco Logistics Partners, L.P., a master publicly traded limited partnership (NYSE:SXL).

10. Pursuant to a certificate of public convenience dated January 10, 2002 (and docketed on January 25, 2002), SPLP received approval from the Commission for the transfer, merger, possession and use of, all PA PUC jurisdictional assets of Sun Pipe Line Company ("Sun") and Atlantic Pipeline Corporation ("Atlantic"). In the second ordering paragraph of a Corrected Order docketed on January 28, 2002, the Commission clarified that its approval included "the right of Sunoco Pipeline L.P. to transport petroleum products in the former service territory of Sun Pipe Line Company and Atlantic Pipeline Corp." *See Joint Application of Sunoco Pipeline L.P., Sun Pipeline Corp. for Approval of the Transfer of Assets and Merger of Sun Pipe Line Company and Atlantic Pipeline Corp. to Sunoco Pipeline L.P. for the Right of Sunoco Pipeline L.P. to Transport Petroleum Products in the Former Service Territory of Sun Pipe Line Company and Atlantic Pipeline Corp. and for the Abandonment of Services by Sun Pipe Line Company and Atlantic Pipeline Corp.*, Corrected Order, Docket No. A-140001, A-140400 F2000, A-140075 F2000 (Jan. 28, 2002).

11. The acquisition of the Sun and Atlantic pipeline assets permitted SPLP to operate an integrated pipeline system that included, among other things, an 8" pipeline that extended from Point Breeze to Montello, a 12" pipeline that extended from Point Breeze to Montello, an 8" pipeline that extended from Twin Oaks to Exton, Fullerton, Macungie, and Montello, certain 6", 8" and 14" pipelines in segments that extended from Montello to Williamsport, and an 8" pipeline that extended from Montello to Mechanicsburg, and then from Mechanicsburg to Delmont, Pennsylvania and then from Delmont to Pittsburgh, Pennsylvania.

12. To be able to address the deficit in pipeline infrastructure available for the movement of natural gas liquids from the Marcellus Shale as quickly as possible, the Mariner East project was designed in part to reconfigure certain aspects of SPLP's existing integrated pipeline system to convert certain segments that were in transportation services of certain petroleum products and refined petroleum products (gasoline and distillate) to transportation services of other petroleum products and refined petroleum products (ethane and propane), with the intent that once the Mariner East pipeline system was complete, certain segments of the existing system east of Mechanicsburg would be utilized for both ethane and propane as well as other petroleum products transportation services, while the pipeline segments between Delmont and Mechanicsburg would be initially utilized primarily for transportation services of petroleum products (ethane and propane).

13. SPLP currently continues to provide certificated transportation services of petroleum products and refined petroleum products west of Delmont, PA (in Westmoreland and Allegheny Counties) on this existing pipeline.

14. To facilitate its Mariner East project, in 2013, SPLP filed an application with the Commission to abandon a portion of certain intrastate service along portions of its pipeline system and to suspend a portion of certain intrastate service along other segments for the transportation of gasoline and distillates. Specifically, SPLP sought to abandon transportation services of gasoline and distillates from: (1) Point Breeze to Eldorado, Delmont, Blawnox, and Pittsburgh; (2) Montello to Eldorado, Delmont, and Blawnox; and (3) Twin Oaks to Icedale, Malvern, Eldorado, Delmont, and Pittsburgh. *See Application of Sunoco Pipeline L.P. for: (I) Issuance of a Certificate of Public Convenience approving the Abandonment of a Portion of Its Petroleum Products Pipeline Transportation Service within Pennsylvania, from: (1) Point*

Breeze to Eldorado, Delmont, Blawnox, and Pittsburgh; (2) Montello to Eldorado, Delmont, and Blawnox; and (3) Twin Oaks to Icedale, Malvern, Eldorado, Delmont, and Pittsburgh; and (II) All Other Approvals or Certificates Appropriate or Necessary Under the Public Utility Code to Grant the Relief Requested in the Application, as filed on July 2, 2013 (the "Abandonment Application"), Docket No. A-2013-2371789.

15. Concurrently with the Abandonment Application, SPLP filed a petition to temporarily suspend service for the transportation of gasoline and distillate on certain pipeline routes that extended from (1) Point Breeze to Mechanicsburg and (2) Twin Oaks to Exton, Fullerton, Macungie, Montello, Mechanicsburg, Tamaqua, Williamsport, and Kingston. *See Petition of Sunoco Pipeline, L.P. for Approval of Temporary Suspension of Petroleum Products Transportation Service From: (1) Point Breeze to Mechanicsburg and (2) Twin Oaks to Exton, Fullerton, Macungie, Montello, Mechanicsburg, Tamaqua, Williamsport, and Kingston,* as filed on July 2, 2013 (the "Suspension Petition"), Docket No. P-2013-2371775. In its Suspension Petition, SPLP advised that "[r]ather than abandon those services, SPLP believes it is prudent and consistent with the public interest to preserve the opportunity to provide intrastate service on those segments and, to that end, is requesting through its Petition a temporary suspension of those services." *Id.*

16. By Order entered on August 29, 2013 and subsequently clarified on October 17, 2013, the Commission approved both the Abandonment Application and the Suspension Petition, authorizing SPLP to suspend intrastate pipeline service on the designated routes for 18 months. *See Application of Sunoco Pipeline L.P. for a Certificate of Public Convenience to Abandon a Portion of its Petroleum Products Pipeline Transportation Service in Pennsylvania,* Order, Docket Nos. A-2013-2371789, P-2013-2371775 (Aug. 29, 2013, *as amended* Oct. 17, 2013).

17. The effect of the Commission's approval of the Abandonment Application and Suspension Petition is that SPLP continues to hold a CPC to provide petroleum products and refined petroleum products transportation service on its pipelines between Twin Oaks and Delmont, Pennsylvania; however, service has been temporarily suspended on routes east of Mechanicsburg in accordance with the Commission's approval of the Suspension Petition and a tariff supplement subsequently filed by SPLP (the "Suspension Segment"), and transportation service for gasoline and distillate that included points west of Mechanicsburg and out to Delmont has been abandoned pursuant to a CPC authorizing abandonment (the "Abandonment Segment").

18. In approving the temporary suspension, the Commission observed, among other things, that SPLP stated it "was currently exploring potential capital investments that would allow resumption of service on the Suspension Segment following completion of Mariner East and following completion of the targeted capital additions that would allow resumption of certain intrastate services." *See Application of Sunoco Pipeline L.P. for a Certificate of Public Convenience to Abandon a Portion of its Petroleum Products Pipeline Transportation Service in Pennsylvania*, Order, Docket Nos. A-2013-2371789, P-2013-2371775 (Aug. 29, 2013).

III. DESCRIPTION OF THE MARINER EAST PROJECT

19. SPLP has now completed the planning and engineering of the first phase of the Mariner East project. The rapid expansion of natural gas production from the Marcellus Shale deposits has significantly revitalized local economies across Pennsylvania while also enhancing the country's energy supply portfolio and redefining global energy markets. Even as production has flourished, however, Pennsylvania has experienced severe shortages of propane during periods of peak demand like the 2013-2014 winter season, due in part to lack of adequate pipeline capacity. As a result of the high supply of propane and other NGLs, and given the need

for uninterrupted deliveries of propane in the Commonwealth, the demand for intrastate transportation of propane is significant. To that end, shippers have expressed interest in intrastate pipeline service to transport propane within the Commonwealth.

20. SPLP had initially prioritized for the Mariner East pipeline system to provide *interstate* transportation of ethane and propane from west-to-east. Given the increased interest expressed by shippers in securing *intrastate* pipeline transportation facilities sooner than originally anticipated, and in recognition of the public interest in ensuring adequate pipeline capacity to meet peak demand for propane during the winter season, SPLP is able to answer shipper demand and the public interest and now has acted to offer *intrastate* service as well along the existing pipelines, and will further be able to offer more intrastate service pipeline capacity and more destinations within the Commonwealth upon full completion of the Mariner East pipeline system.

21. To 2014-2015 winter season, SPLP will be resuming service in the Suspension Segment and will file a tariff supplement to implement service between Mechanicsburg and its Twin Oaks facility. This will allow SPLP to transport propane by pipeline from Mechanicsburg and significantly increase the delivery capacity due to the superior efficiency of pipeline transportation as compared to truck transportation. Initially, an estimated additional 5,000 barrels per day of propane will be delivered to Twin Oaks, an incremental change equivalent to approximately 25 additional transport truck loads per day (representing a considerable part of the winter demand for propane). A corollary benefit is the safety benefits and improvements realized by being able to reduce the number of trucks that were previously utilized to deliver propane within the Commonwealth. Thus, transporting propane via pipeline from Mechanicsburg to Twin Oaks will have the dual benefits of significantly increasing delivery

capacity to local customers, while also improving safety and transport and minimizing on road traffic.

22. As part of the Mariner East pipeline system, SPLP will also be filing an application pursuant to Section 703(g) of the Public Utility Code, 66 Pa.C.S. § 703(g), to amend the CPC authorizing abandonment in the Abandonment Segment to reinstate intrastate service that will extend from Delmont to various points east. SPLP will also be filing an application for a CPC to extend its intrastate petroleum transportation system to new service territory that includes Washington County, Pennsylvania for a segment of pipeline to be constructed from Houston, Pennsylvania to Delmont, Pennsylvania. Upon completion of this pipeline system, SPLP will be able to offer intrastate deliveries of propane from Houston, Pennsylvania, as well as Mechanicsburg, to its Twin Oaks facilities.

23. When completed, the Mariner East project will (i) provide desperately needed pipeline infrastructure to transport of ethane, propane, and other petroleum products from the Marcellus Shale to markets in Pennsylvania and elsewhere; (ii) facilitate the repurposing of the Marcus Hook Industrial Complex; (iii) promote sustained economic development and jobs–creation throughout multiple regions in Pennsylvania; and (iv) allow shippers to arrange reliable intrastate transportation of propane during the winter season when demand for this service peaks.

IV. EXEMPTION FROM LOCAL ZONING

24. Section 619 of the Pennsylvania MPC, 53 P.S. § 10619, provides in relevant part:

> This article shall not apply to any existing or proposed building, or any extension thereof, used or to be used by a public utility corporation, if, upon petition of the corporation, the Pennsylvania Public Utility Commission shall, after public hearing, decide that

> the present or proposed situation of the building in question is reasonably necessary for the convenience or welfare of the public.

25. In *Del-AWARE Unlimited, Inc. v. Pa. Pub. Util. Comm'n*, 513 A.2d 593, 596 (Pa. Commw. Ct. 1986), the Commonwealth Court ruled that Section 619 only empowers the PUC to decide if there is reasonable necessity for the *site* of buildings. Public utility facilities that are not "buildings" do not require a determination that the site is reasonably necessary for the public convenience or welfare. *Id.* (holding that Del-AWARE's argument that the PUC should have considered the impacts of a reservoir were meritless because the reservoir was not a "building" and the PUC therefore only had authority to consider the siting of the associated pumphouse).

26. In determining whether a site is reasonably necessary, a public utility does not need to show absolute necessity or that the site chosen is the best site; instead, it need only show that the site chosen is "reasonably necessary..." for the convenience or welfare of the public. *Petition of UGI Penn Natural Gas Inc. for a Finding that Structures to Shelter Pipeline Facilities in the Borough of West Wyoming, Luzerne County, To the Extent Considered To be Buildings under Local Zoning Rules, Are Reasonably Necessary for The Convenience or Welfare of the Public*, 2013 WL 6835113 (Pa. P.U.C. 2013); *see also O'Connor v. Pa. Pub. Util. Comm'n*, 582 A.2d 427, 433 (Pa. Commw. Ct. 1990).

27. On January 11, 2001, the Commission adopted a policy statement providing that the Commission will consider the impact of its decisions upon local comprehensive plans and zoning ordinances. *See* 31 Pa. B. 951 (Feb. 17, 2001). Section 69.1101 of the Commission's Regulations provides that the siting of a public utility "building" under section 619 of the MPC is one of the decisions where the Commission will consider this impact. 52 Pa. Code § 69.1101.

28. This Petition involves the situation of structures in West Goshen Township, Chester County; however, the Mariner East Project spans approximately 300 miles. The local ordinances in these municipalities may impose restrictions on SPLP concerning construction of the structures discussed herein. Due to the number of implicated local ordinances by the Mariner East project, SPLP has not included with this Petition all of the relevant local ordinances. *See In Re Trans-Allegheny Interstate Line Company*, 2008 WL 5786507, at *32 (Pa. P.U.C. 2008). If the Commission would like a copy of these ordinances, SPLP will include them in the record by submitting them as part of the Direct Testimony supporting the Petition.

29. SPLP has pledged and is committed to working with each of the local municipalities to coordinate aesthetic concerns relating to the structures, such as shrubbery and screening. Without, however, Commission exemption as requested herein, SPLP may be prevented by one or more municipalities from constructing the structures that are necessary for the pump or valve control stations required by Mariner East. To ensure that otherwise applicable local ordinances will not bar SPLP's efforts to provide service for the welfare and convenience of the public, SPLP is filing the instant Petition and contends that the proposed situation of the pump and valve control stations is reasonably necessary for the convenience or welfare of the public.

V. THE PUMP STATIONS AND VALVE CONTROL STATIONS

30. As an integral part of the Mariner East pipeline project and the repurposing of its existing pipeline assets, SPLP will be constructing 18 new pump stations and 17 new valve control stations along the pipeline. **Exhibit "C"** provides a list of pump stations and their locations. **Exhibit "D"** provides a list of valve control stations and their locations. These new pump stations and valve control stations will be situated in 31 different municipalities of the

Commonwealth. Twelve of those municipalities lie east of Mechanicsburg, where SPLP has a CPC to provide petroleum products transportation service.

31. The pump stations to be constructed by SPLP will be used to inject energy into the flow of ethane and propane moving through the pipeline. As ethane and propane travel through the pipeline, they lose energy; without the existence of pump stations, they would eventually stop flowing. SPLP is siting the pump stations at points along the pipeline where the energy for transporting ethane and propane drops below an acceptable level. SPLP has identified the minimum number of pump stations that will allow for an efficient flow of ethane and propane. Once an ideal location is identified for a pump station, the location is then refined to ensure site availability and an adequate electrical power source for the pump station, as the pumps themselves are electrically powered. **Exhibit "E"** contains a graph demonstrating that the locations of the pump stations are based on where the amount of fluid energy is dropping below sub-optimal levels.

32. SPLP will be constructing the valve control stations on Mariner East to provide a safety enhancement for the pipeline facilities. The valve control stations will monitor the temperature and pressure of the ethane and propane and are programmed to automatically segment (*i.e.*, cut off) flows on the line if the controls detect a loss in pressure. To ensure safety of the public, valve control stations will be located throughout the pipeline system and, specifically, upstream of large concentrations of population. SPLP has employed a refined site selection process based on available sites in combination with available electrical infrastructure. The alignment of these factors (*i.e.*, location relevant to population concentration, adequate power source, and available land) determines the precise location of a valve control site.

33. Each pump station has two structures that a municipality could characterize as "buildings." First, each station has a structure that surrounds the pump itself. This structure functions to reduce noise, protect the pump equipment from weather impacts, and allow for convenient maintenance of the pump equipment. In addition to this structure, each pump station has a power distribution center, which is a modular building that houses the electrical, control, and communication equipment for the pump.[3]

34. Similarly, each of the valve control stations has a single structure that protects the valve control stations against weather impacts and allows for convenient maintenance at the site. This structure, also known as a power distribution center, is smaller in size than the power distribution centers for pump stations, and houses the electrical, control, and communication equipment for the valve control site.

35. The Commission has held that buildings are reasonably necessary for the convenience or welfare of the public when the buildings present public benefits, which may include "protection of sensitive measuring equipment, the protection for personnel performing maintenance on this equipment," among others. *Petition of UGI Penn Natural Gas Inc., supra.*

36. The construction of these pump and valve control stations is an integral and necessary part of the development of the Mariner East project, and these stations and the project itself will provide benefits to the public. First, the locations of both pump and valve control

[3] Although not relevant to this Petition because they do not involve "buildings," each pump station also includes a vapor combustion unit to contend with the loss of limited ethane and propane that converts into a gaseous state upon loss of pressure. The ethane and propane that travels through the pipeline remains in a liquid state as long as sufficient pressure is applied throughout the pipeline. During maintenance operations at the pump stations, however, reduction in pressure may cause the ethane and propane to convert into a gaseous state. The vapor combustion units ensure that these gases are not directly released into the atmosphere, which promotes safe and environmentally beneficial maintenance operations at the pump stations. The Pennsylvania Department of Environmental Protection ("DEP") has indicated that the emissions from these units have a *de minimis* environmental impact.

stations are reasonably necessary to ensure efficient and safe operation of the new pipeline facilities. Second, the pump stations ensure that the propane is flowing properly, which contribute to the overall safety and efficiency of the project. The valve control stations ensure that the pipeline facilities operate safely and prevent harm to the public and environment. The equipment is enclosed with housing to protect it from the elements and to facilitate maintenance. Finally, as a whole, the Mariner East project results in increased infrastructure to enable the continued development of Marcellus Shale resources, by providing for an efficient outlet for natural gas liquids that are extracted during the process of extracting natural gas from Marcellus Shale wells.

37. In the context of SPLP's abandonment application proceeding last year, the Commission found that abandonment of existing services in order to facilitate construction of the Mariner East project was necessary for the public convenience and welfare. Specifically, the Commission held that "there are significant public benefits to be gained by approving the Application and Petition and that there is minimal impact on customers."[4] The situation of pump station buildings and valve control site buildings is another and near-final step in the development of Mariner East. For essentially the same reasons it granted SPLP's application for abandonment, the Commission should grant the exemptions requested in this petition.

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[4] *See Application of Sunoco Pipeline L.P. for a Certificate of Public Convenience to Abandon a Portion of its Petroleum Products Pipeline Transportation Service in Pennsylvania*, Opinion and Order, Docket No. A-2013-2371789 (Aug. 29, 2013, *as amended* Nov. 14, 2013).

38. For all of the foregoing reasons, SPLP submits that SPLP's situation of pump station and valve control site structures is reasonably necessary for the convenience and welfare of the public.

Dated: May 8, 2014

Respectfully Submitted,
BLANK ROME LLP

Christopher A. Lewis (ID #29375)
Michael L. Krancer (ID # 39443)
Frank L. Tamulonis (ID# 208001)
Blank Rome LLP
One Logan Square
Philadelphia PA 19103
Phone: (215) 569-5793
Counsel for Sunoco Pipeline L.P.

EXHIBIT "A"

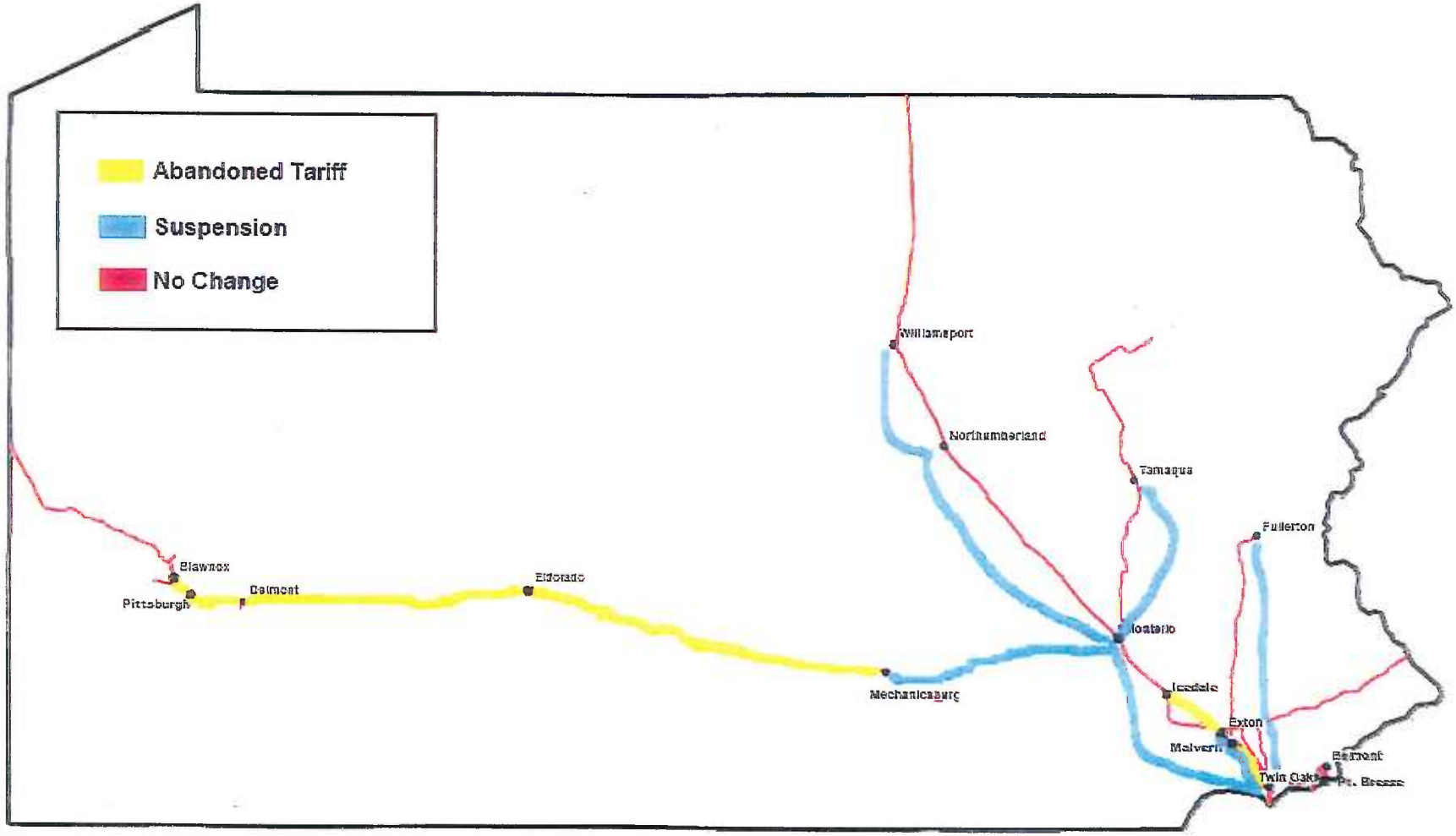

Abandoned Tariff
Suspension
No Change
Williamsport
Northumberland
Tamaqua
Fullerton
Blawnox
Pittsburgh
Belmont
Eldorado
Mechanicsburg
Exton
Malvern
Twin Oaks

EXHIBIT "B"

Housing for the Pump Stations and Control Valve Stations

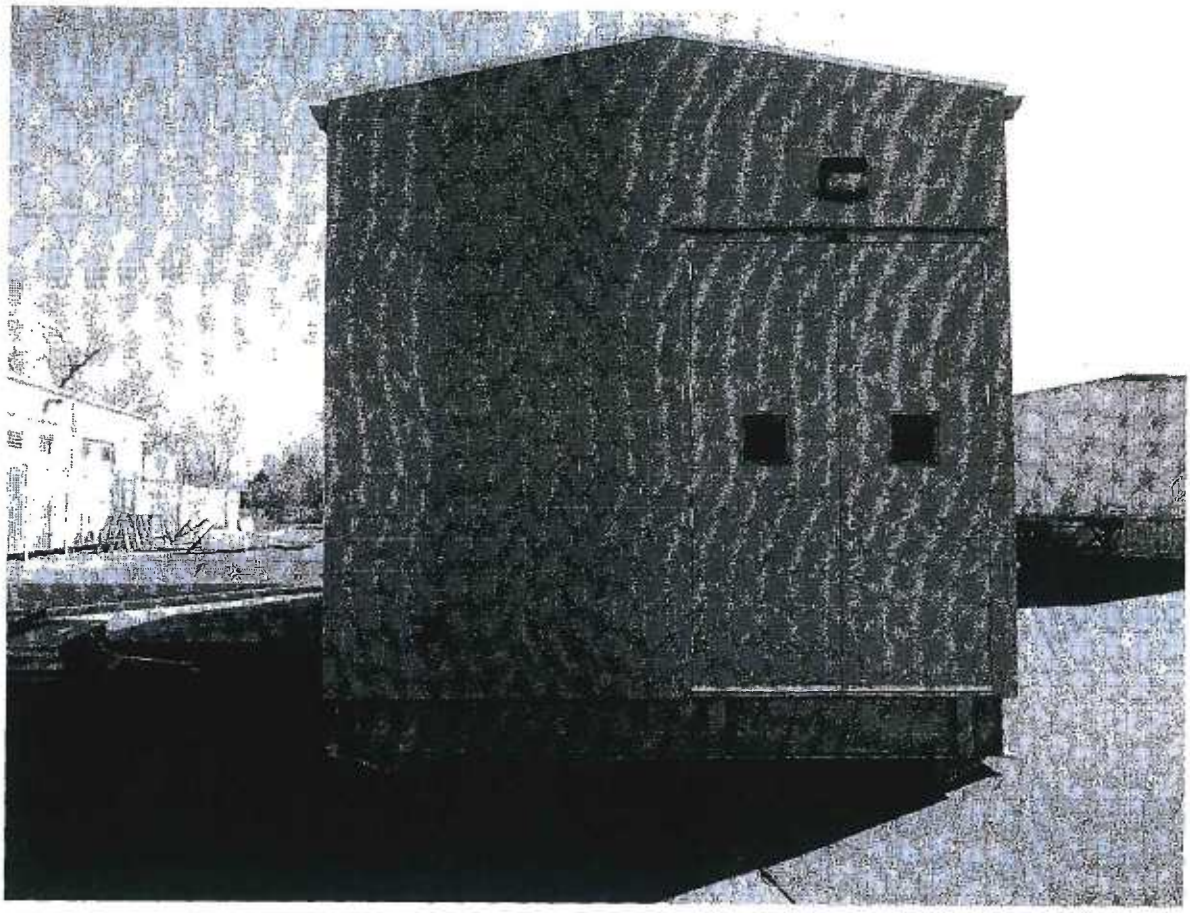


EXHIBIT "C"

List of Pump Stations and Locations

Station Name	Township	County
Delmont	Salem	Westmoreland
Blairsville	Burrell	Indiana
Cramer	East Wheatfield	Indiana
Ebensburg	Cambria	Cambria
Hollidaysburg	Allegheny	Blair
Marklesburg	Penn	Huntingdon
Mt. Union	Shirley	Huntingdon
Doylesburg	Toboyne	Perry
Plainfield	Lower Frankford	Cumberland
Mechanicsburg	Hampden	Cumberland
Middletown	Londonderry	Dauphin
Cornwall	West Cornwall	Lebanon
Blainsport	West Cocalico	Lancaster
Montello	Spring	Berks
Beckersville	Brecknock	Berks
Eagle	Upper Uwchlan	Chester
Boot	West Goshen	Chester
Twin Oaks	Upper Chichester	Delaware

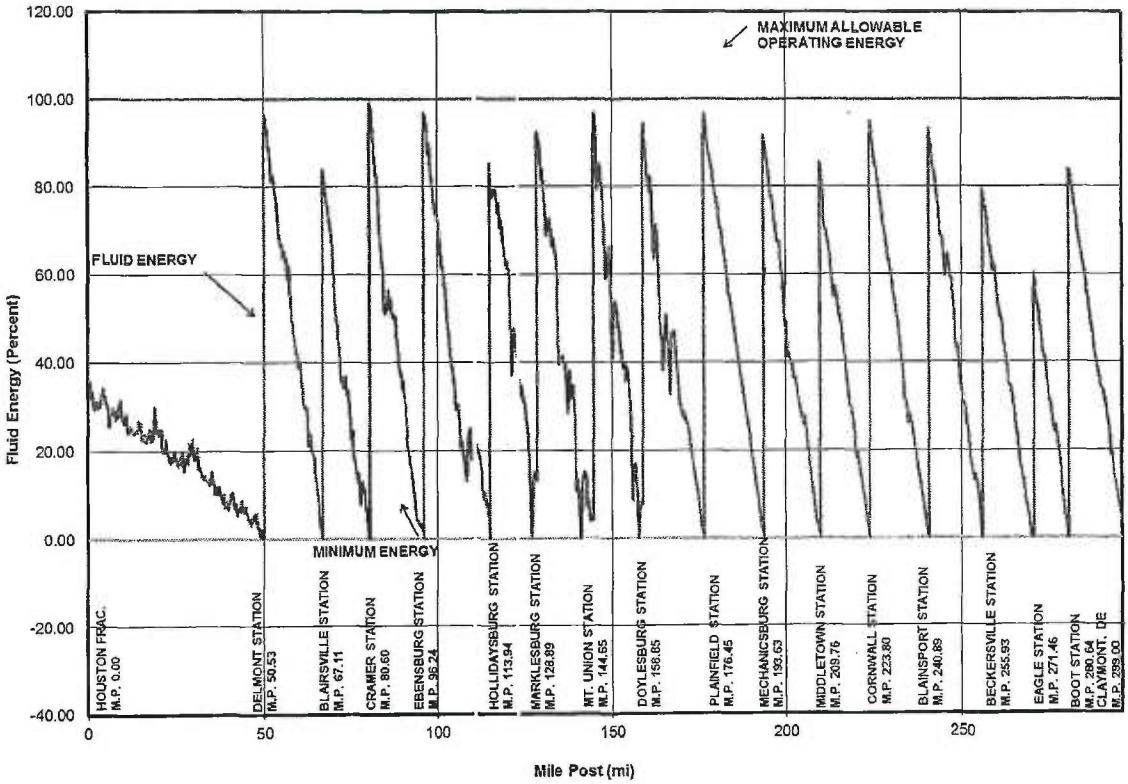
EXHIBIT "D"

List of Valve Control Stations and Locations

Facility Name	Township	County
Houston - Mark West	Chartiers	Washington
Houston - Williams	Chartiers	Washington
West Pike St.	Chartiers	Washington
Ross Rd	North Strabane	Washington
Monongahela River West	Union	Washington
Youghiogheny River South	Rostraver	Westmoreland
Old Harmony Rd	Hempfield	Westmoreland
Old Chestnun Ln	Penn	Westmoreland
West Loyalhanna Dam	Loyalhanna	Westmoreland
W Conemaugh River	Derry	Westmoreland
Juniata River West	Frankstown	Blair
Raystown Lake West	Penn	Huntingdon
Conodoquist River West	N. Middleton	Cumberland
Old York Rd	Fairview	York
Middletown Jct EFRD	L. Swatara	Dauphin
Montello EFRD	Spring	Berks
Walnut Bank	Wallace	Chester

EXHIBIT "E"

Sunoco Logistics, L.P.
72.5 MBPD 67.33 Ethane/Propane Mix Energy Profile



VERIFICATION

Harry J. Alexander deposes and says he is Vice President, Business Development of Sunoco Pipeline L.P. that he is duly authorized to and does make this Verification on behalf of SPLP; that the facts set forth in the foregoing Petition are true and correct to the best of his knowledge information and belief; and that this verification is made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

HARRY J. ALEXANDER

DATED: May 8, 2014

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of May, 2014 cause a true copy of the foregoing document to be served upon the participants listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Via First Class Mail

Honorable Elizabeth H. Barnes
P.O. Box 3265
Harrisburg, PA 17105-3265
Also via email

Honorable David A. Salapa
P.O. Box 3265
Harrisburg, PA 17105-3265
Also via email

Lynn Cain
Salem Township Planning Commission
244 Congruity Road
Greensburg, PA 15601

Rosemary Chiavetta, Secretary
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

David Hoover, Supervisor
Cambria Township Board of Supervisors
184 Municipal Road
Ebensburg, PA 15931

Johnnie Simms, Esquire
Bureau of Investigation and Enforcement
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor West
Harrisburg, PA 17120

Robert Zundell, Chairman
Salem Township Board of Supervisors
244 Congruity Rd.
Greensburg, PA 15601

Tanya McCloskey, Esquire
Aron J. Beatty, Esquire
Office of Consumer Advocate
555 Walnut Street
Forum Place - 5th Floor
Harrisburg, PA 17101-1921

John R. Evans, Esquire
Office of Small Business Advocate
Suite 1102, Commerce Building
300 North Second Street
Harrisburg, PA 17101

Dennis Simmers, Chairman
Cambria Township Planning Commission
P.O. Box 248
Revloc, PA 15948

David E. Burchfield, Jr.
3131 Colonial Drive
Duncansville, PA 16635
Representing Allegheny Township Board of Supervisors

Bruce J. Pergament, Supervisor
Penn Township Board of Supervisors
12281 Redstone Ridge Road
Hesston, PA 16647

John McGarvey, Chair
Shirley Township Planning Commission
15480 Croghan Pike
Shirleysburg, PA 17260

Kenneth A. Umholtz, Chairman
E. Wheatfield Board of Supervisors
1114 Rt. 56
East Armagh, PA 15920

James Burkholder, Jr., Chairman
Lower Frankford Township
Board of Supervisors
1205 Easy Road
Carlisle, PA 17015

James J. Henry
50 Lower Buck Ridge Road
Blain, PA 17006
Representing Toboyne Township Board of Supervisors

James H. Turner, Chairman
Tri-County Regional Planning Commission
Dauphin County Veterans Memorial Bldg.
112 Market Street, 2nd Floor
Harrisburg, PA 17101

Craig Houston, Chairman
Lower Frankford Township
Planning Commission
1205 Easy Road
Carlisle, PA 17015

Jacque A. Smith, Chairman
West Cocalico Township
Board of Supervisors
P.O. Box 244
Reinholds, PA 17569

Leon Eby, Chairman
West Cocalico Township
Planning Commission
P.O. Box 244
Reinholds, PA 17569

Al Bienstock, President
Hampden Township Board of Commissioners
230 South Sporting Hill Rd.
Mechanicsburg, PA 17050

Philip Klotz, Chairman
Hampden Township PlanningCommission
230 South Sporting Hill Road
Mechanicsburg, PA 17050

Patti Smith, Chairman
Spring Township Board of Supervisors
2850 Windmill Road
Sinking Spring, PA 19608

Ronald Kopp, Chairman
Londonderry Township Board of Supervisors
783 S. Geyers Church Road
Middletown, PA 17057

James R. Oswald, Chairman
Spring Township Planning Commission
2850 Windmill Road
Sinking Spring, PA 19608

Carolyn Akers, Chair
Londonderry Township Planning Commission
783 S. Geyers Church Road
Middletown, PA 17057

Jeffrey M. Fiant, Chairman
Brecknock Township Board of Supervisors
889 Alleghenyville Road
Mohnton, PA 19540

John R. Burger, Chairman
Brecknock Township Planning Commission
889 Alleghenyville Road
Mohnton, PA 19540

Catherine A. Tomlinson, Chair
Upper Uwchlan Township
Board of Supervisors
140 Pottstown Pike
Chester Springs, PA 19425

Carl Dei Cas, Chair
Union Township Board of Supervisors
3904 Finleyville-Elrama Road
Finleyville, PA 15332

Anthony Gallagher
Steamfitters Local Union 420
14420 Townsend Road Suite A
Philadelphia, PA 19154-1028

Phil Shelapinsky, Chairperson
Hempfield Township Planning Commission
1132 Woodward Drive, Suite A
Greensburg, PA 15601-9310

James Renner, Chairman
Upper Chichester Planning Commission
P.O. Box 2187
Upper Chichester, PA l9061

Robert J. Schoenberger, Chair
Upper Uwchlan Township
Planning Commission
140 Pottstown Pike
Chester Springs, PA 19425

Russell L. Gibble, Chairman
West Cornwall Township
Board of Supervisors
73 South Zinns Mill Road
Lebanon, PA 17042

Dewey Yoder
West Cornwall Township
Planning Commission
73 South Zinns Mill Road
Lebanon, PA 17042

Paul A. Mullen
3729 Chichester Avenue
Boothwyn, PA 19061-3135
Representing Local Union No 654

Tamira Spedaliere, Township Planner
Rostraver Township
201 Municipal Drive
Belle Vernon, PA 15012

Douglas Weimer, Chairman
Hempfield Township Board of Supervisors
1132 Woodward Drive, Suite A
Greensburg, PA 15601-9310

Michael Gaudiuso, President
Upper Chichester Board of Commissioners
P.O. Box 2187
Upper Chichester, PA 19061

Jodi Noble, Township Manager
Chartiers Township
2 Buccaneer Drive
Houston, PA 15342

Judith A. Hicks, Chairwoman
Shirley Township Board of Supervisors
15480 Croghan Pike
Shirleysburg, PA 17260

Lee Nickovich, Chairman
Chartiers Township Planning Commission
2 Buccaneer Drive
Houston, PA 15342

Frank Siffrinn, Township Manager
North Strabane Township
1929 Route 519
Canonsburg, PA 15317

Robert Balogh, Chairman
North Strabane Township
1929 Route 519
Canonsburg, PA 15317

Andrew Tullai, Chairman
Union Township Board of Supervisors
3904 Finleyville-Elrama Road
Finleyville, PA 15332

Harry Kelso, Chairman
North Middleton Township
Board of Supervisors
2051 Spring Road
Carlisle, PA 17013

Robert P. Stanley, Jr.
Fairview Township Board of Supervisors
599 Lewisberry Road
New Cumberland, PA 17070

Michael A. Powers
Fairview Township Planning Commission
599 Lewisberry Road
New Cumberland, PA 17070

Thomas L. Mehaffie III, President
Lower Swatara Township Board
1499 Spring Garden Drive
Middletown, PA 17057

Bruce Light, Township Manager
Penn Township
2001 Municipal Court
Harrison City, PA 15636-1349

Phillip Miller, Chairman
Penn Township Planning Commission
2001 Municipal Court
Harrison City, PA 15636-1349

Vincent DeCario, Chairman
Derry Township Board of Supervisors
5231 Route 982
Derry, PA 15627

George Henry, Chairman
Frankstown Township Board of Supervisors
2122 Frankstown Road
Hollidaysburg, PA 16648

Scott J. Rubin, Esquire
333 Oak Lane
Bloomsburg, PA 17815
Representing Concerned Citizens of West Goshen Township

Patti Smith, Chairman
Spring Township Board of Supervisors
2850 Windmill Rd.
Sinking Spring, PA 19608

James R. Oswald, Chairman
Spring Township Planning Commission
2850 Windmill Road
Sinking Spring, PA 19608

Rob Jones, Chairman
Wallace Township Board of Supervisors
1250 Creek Road
P.O. Box 670
Glen Moore, PA 19343

John Frommeyer, Chairman
Wallace Township Planning Commission
1250 Creek Road
P.O. Box 670
Glen Moore, PA 19343

Tony Distefano, Supervisor
Burrell Township Board of Supervisors
321 Park Drive
Blacklick, PA 15716

Chauncey D. Knopp
Lower Swatara Township
Planning Commission
1499 Spring Garden Drive
Middletown, PA 17057

Margaret A. Morris, Esquire
Reger Rizzo & Darnall
2929 Arch Street
13th Floor
Philadelphia, PA 19104
Representing East & West Goshen Township

Augusta Wilson, Esquire
Joseph O. Minott, Esquire
135 S. 19th St
Ste. 300
Philadelphia, PA 19103
Representing Clean Air Council

Aaron Stemplewicz, Esquire
925 Canal Street
Suite 3701
Bristol, PA 19007
Representing Delaware River Keeper Network

Lynda Farrell
Pipeline Safety Coalition
331 Norwood Road
Downingtown, PA 19335

Carol N. Tompkins
1245 Victoria Lane
West Chester, PA 19380

Lori Kier
619 Marydell Drive
West Chester, PA 19380

Christian Kier
619 Marydell Drive
West Chester, PA 19380

Ralph E. Hyatt
1266 Delmar Ave.
West Chester, PA 19380-4027

Walker C. Tompkins
1245 Victoria Lane
West Chester, PA 19380

Senator Andy Dinniman
19th District
One North Church Street
West Chester, PA 19380

Representative Rick Saccone
39th District
PO Box 202039
Harrisburg, PA 17120-2039

Senator John C. Rafferty Jr.
44th District
3818 Germantown Pike
Collegeville, PA 19426

Senator Dominic Pileggi
9th District
350 Main Capitol Building
Harrisburg, PA 17120-3009

Senator John Wozniak
Senate Box 203035
The State Capitol
Harrisburg, PA 17120

Senator Patricia H. Vance
31st District
3806 Market Street
Camphill, PA 17011

Representative Frank Burns
House of Representatives
PO Box 202072
Harrisburg, PA 17120-2072

Representative Stephen E. Barrar
House of Representatives
18 East Wing
PO Box 202160
Harrisburg, PA 17120-2160

Representative William F. Keller
House of Representatives
PO Box 202184
Harrisburg, PA 17120-2184

Brian Mercadante
Borough of Marcus Hook
10th & Green Streets
Marcus Hook, PA 19061

Mayor Gene Taylor
Borough of Marcus Hook
10th & Green Streets
Marcus Hook, PA 19061

Barry Coniglio
537 Mantua Avenue
Route 45
Woodbury NJ 08096
Representing C&C Supply Company

Douglas R Lengenfelder, President
Cambria County Commissioners Office
200 South Center Street
Ebensburg, PA 15931

Mark J. Wissinger, Safety Officer
Office of County Commissioners
200 South Center Street
Ebensburg, PA 15931

Thomas C. Chernisky
Office of County Commissioners
200 South Center Street
Ebensburg, PA 15931

Jody Ross, M.D.
437 Nye Road
Hummelstown, PA 17036

Diane & Scott Dombach
Marjory Diane Dombach
402 Burgner's Road
Carlisle, PA 17015

Adam Kron, Esquire
1000 Vermont Ave. NW
Suite 1100
Washington DC 20005
Representing Environmental Integrity Project

Dennis Rochford
240 Cherry Street
Philadelphia, PA 19106-1906
Representing Maritime Exchange For The Delaware River And Bay

Timothy J. Brink
2250 Hickory Road
Suite 100
Plymouth Meeting, PA 19462
Representing Mechanical & Service Contractors Associations of Eastern Pennsylvania & Greater Delaware Valley

Nick Kennedy, Esquire
1414-B Indian Creek Valley Road
PO Box 408
Melcroft, PA 15462
Representing Mountain Watershed Association

Gene Barr
Pennsylvania Chamber of Business and Industry
417 Walnut Street
Harrisburg, PA 17101

David R. Yoder, Esquire
Law Offices of David R. Yoder
PO Box 215
Carlisle, PA 17013
Representing Rolfe & Doris Blume, David & Faith Fertig

Edward Hargraves
2522 Metropolitan Drive
PO Box 28
Trevose, PA 19053-0028
Representing SDA Mechanical Services Inc

Bud Burns
Scheck Mechanical Corporation
4009 Market St
Suite H
Aston, PA 19014

Christopher J. Kemner
201 Fulton Street
Chester, PA 19013

Craig Hahnlen
185 Woodbine Drive
Hershey, PA 17033

Duncan Neilson
Energy Products Co
PO Box 809
3970 Washington Road
McMurray, PA 15317

John & Susan Rapp
1239 Victoria Lane
West Chester, PA 19380

Mary Leitch
526 Reed St
Philadelphia, PA 19147

Nick Garavelas
Service Painting Inc
200 Price Street
PO Box 433
Trainer, PA 19061

Wayne Norris
Dura-Bond Coating Inc
Post Office Drawer 518
2658 Puckety Drive
Export, PA 15632

William E. Knowles Jr.
2 Flamingo Road
Hatboro, PA 19040

Brett Saddler
3301 Green Street
Suite 356
Claymont, DE 19703
Representing The Claymont Renaissance Development Corporation

John Occhipinti
575 Mountain Avenue
Murray Hill, NJ 07974
Representing The Linde Group

Joseph P. Kirk
435 Donner Avenue
Suite 410
Monessen, PA 15062
Representing The Mon Valley Progress Council

Robert J. Shoenberger
Upper Uwchlan Township
140 Pottstown Pike
Chester Springs, PA 19425

Jeff M. Kotula
Washington County Chamber of Commerce
375 Southpointe Blvd.
Suite 240
Canonsburg, PA 15317

Chad Amond
Westmoreland Chamber of Commerce
241 Tollgate Hill Road
Greensburg, PA 15601

James J. White Jr.
J J White Incorporated
5500 Bingham Street
Philadelphia, PA 19120

/s/ Christopher A. Lewis
Counsel to Sunoco Pipeline, L.P.