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April 29, 2014

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

**VIA ELECTRONIC FILING**

Re: Petition of Sunoco Pipeline, L.P. for 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 Nos. P-2014-2411941, *et al.*

Dear Secretary Chiavetta,

Enclosed please find the Answer of Sunoco Pipeline, L.P. to the Preliminary Objections of the Delaware Riverkeeper Network and the Delaware Riverkeeper. A copy has been served in accordance with the enclosed certificate of service, including a copy to Judges Salapa and Barnes. If you have any questions, please do not hesitate to contact me.

Respectfully Submitted,

BLANK ROME



Christopher A. Lewis (ID #29375)  
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*Counsel for Sunoco Pipeline, L.P.*

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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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 (consolidated with Welfare of the Public in West Goshen) : Docket Nos. P-2014-2411966, 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

(Not Consolidated)<sup>1</sup>

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**ANSWER OF SUNOCO PIPELINE L.P. TO THE PRELIMINARY OBJECTIONS  
OF DELAWARE RIVERKEEPER NETWORK**

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Pursuant to 52 Pa. Code §§ 5.61(a)(2) 5.91(b) and 5.101(f) Sunoco Pipeline L.P. ("SPLP") hereby files this Answer to the Preliminary Objections filed by the Delaware Riverkeeper Network and the Delaware Riverkeeper ("DRN") in response to SPLP's above-stated Petition 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 ("Petition for Exemption"). For the reasons stated herein, SPLP respectfully requests that the Commission deny the Preliminary Objections of the DRN as moot.

In support thereof SPLP avers as follows:

1. Under 52 Pa. Code § 5.91(b) a party may file an amended pleading as of course within 20 days after service of a copy of a preliminary objection filed under § 5.101 (referring to

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<sup>1</sup> SPLP lists here all 31 pending dockets involving SPLP's Petitions for Exemption because the DRN's pleadings were added to all 31 dockets. However, SPLP's listing of all 31 dockets, which have not been consolidated, should not be interpreted as SPLP's agreement with the docketing of the DRN's pleadings. SPLP reserves the right to challenge the DRN's intervention in any and all dockets.

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preliminary objections). If a party has filed an amended pleading as of course the preliminary objections to the original pleading shall be deemed moot.

2. SPLP will be filing an Amended Petition for Exemption within the 20 days permitted by Section 5.91(b).

3. Consequently all of the DRN's Preliminary Objections are moot.

WHEREFORE SPLP respectfully requests that the DRN's Preliminary Objections be denied upon the filing of SPLP's amended Petition for Exemption.

Dated: April 29, 2014

Respectfully Submitted  
BLANK ROME LLP



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*Counsel for Sunoco Pipeline L.P.*

**VERIFICATION**

Kathleen Shea-Ballay deposes and says she is General Counsel of Sunoco Pipeline L.P. that she is duly authorized to and does make this Verification on behalf of SPLP; that the facts set forth in the foregoing Answer are true and correct to the best of her 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).

  
KATHLEEN SHEA-BALLAY

DATED: April 29, 2014

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document 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 David A. Salapa  
P.O. Box 3265  
Harrisburg, PA 17105-3265

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