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June 30, 2014

VIA ELECTRONIC FILING

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

Re: Sunoco Pipeline L.P.'s Answer to the Petition to Intervene of the Environmental Integrity Project, Docket No. P-2014-2411941, *et al.*

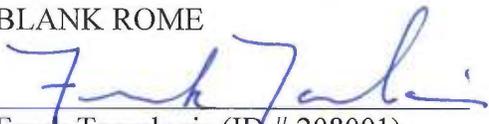
Dear Secretary Chiavetta,

Enclosed please find Sunoco Pipeline L.P.'s Answer to the Petition to Intervene of the Environmental Integrity Project related to the above docket number. A copy has been served in accordance with the enclosed certificate of service.

If you have any questions, please do not hesitate to contact me.

Sincerely yours,

BLANK ROME



Frank Tamulonis (ID # 208001)

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Counsel for Sunoco Pipeline, L.P.

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

**BEFORE THE
COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application 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 and Welfare of the Public

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: Docket Nos. 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

(Not Consolidated)¹

**SUNOCO PIPELINE L.P.’S ANSWER TO THE
PETITION TO INTERVENE OF THE ENVIRONMENTAL INTEGRITY PROJECT**

Pursuant to Section to Section 5.61 of the Commission’s Regulations, 52 Pa. Code § 5.61, Sunoco Pipeline, L.P. (“SPLP”) hereby files the following Answer to the Petition to Intervene of the Environmental Integrity Project (“EIP”) and avers as follows:

1. SPLP asserts, as an affirmative defense, that EIP lacks standing to participate in these proceedings because the interest asserted in paragraph 8 of its Petition to Intervene (*i.e.*, that EIP directly works for itself and others in areas where the pump stations and valve control stations will be located): (*i*) is not an interest which may be directly affected by this proceeding as

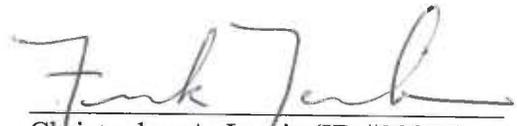
¹ SPLP lists here all 31 pending dockets involving SPLP’s Petitions for Exemption because the EIP’s pleadings were added to all 31 dockets. However, SPLP’s listing of all 31 dockets, which have not been consolidated, should not be interpreted as SPLP’s agreement with the docketing of the EIP’s pleadings. SPLP reserves the right to challenge the EIP’s standing to intervene in any and all dockets. Additionally, SPLP reiterates its express request that these dockets remain unconsolidated.

required by 52 Pa. Code § 5.72(a)(2); and (ii) is not an interest that is direct, immediate and substantial, such that EIP may be “aggrieved”. See *Citizens Against Gambling Subsidies, Inc. v. Pennsylvania Gaming Control Bd.*, 591 Pa. 312, 318, 916 A.2d 624, 628 (2007); see also *William Penn Parking Garage, Inc. v. City of Pittsburgh*, 464 Pa. 168, 346 A.2d 269, 280 (1975).

3. SPLP reserves the right to challenge any and all factual averments and legal conclusions set forth in EIP’s Petition to Intervene relating to SPLP’s Amended Petition.

Dated: June 30, 2014

Respectfully Submitted,
BLANK ROME LLP



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CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of June, 2014, I caused 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

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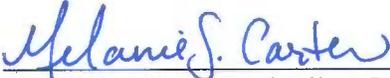
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