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November 7, 2014

Rosemary Chiavetta, Secretary
Pa. Public Utility Commission
P.O. Box 3265
Harrisburg PA 17105-3265

Re: Petition of Sunoco Pipeline, LP, 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 in West Goshen Township, Chester County,
Docket No. P-2014-2411966 (consolidated with
P-2014-2411941, *et al.*

Dear Secretary Chiavetta:

Enclosed for filing please find the Answer of Concerned Citizens of West Goshen Township in the above-referenced proceeding. The document was served as required by 52 Pa. Code § 5.42(b), as shown on the attached Certificate of Service.

In addition, we note that the on-line docket for Docket No. P-2014-2411966 is marked "closed." This appears to be a clerical error, as neither the Commission nor an Administrative Law Judge has ordered this docket closed or formally consolidated it with another docket.

The document was filed electronically with the Commission on this date.

Sincerely,



Enclosure

cc: per Certificate of Service
Administrative Law Judge David Salapa
Administrative Law Judge Elizabeth Barnes

BEFORE THE
COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of Sunoco Pipeline, LP, for a Finding :
That The Situation of Structures to Shelter :
Pump Stations and Valve Control Stations is : Docket No. P-2014-2411966¹
Reasonably Necessary for the Convenience or : (Main Docket: P-2014-2411941)
Welfare of the Public in West Goshen :
Township, Chester County :

ANSWER OF
CONCERNED CITIZENS OF WEST GOSHEN TOWNSHIP

Pursuant to 52 Pa. Code § 5.61 and 5.101(e), Concerned Citizens of West Goshen Township ("CCWGT") files this Answer to the Amended Petition filed by Sunoco Pipeline, LP ("SPLP") on May 8, 2014.²

1. Denied. It is denied that SPLP is a public utility corporation and strict proof thereof is demanded. In addition, the paragraph contains alleged legal conclusions to which no answer is required.

2. Denied. It is denied that the existing pipeline in West Goshen Township, Chester County, will be used to transport energy resources to SPLP's Twin Oaks facility and strict proof thereof is demanded.

¹ CCWGT notes that the on-line docket for Docket No. P-2014-2411966 is marked "closed." This appears to be a clerical error, as neither the Commission nor an Administrative Law Judge has ordered this docket closed or formally consolidated it with another docket.

² On June 4, 2014, CCWGT filed Preliminary Objections that allege insufficient specificity of the Amended Petition. Pursuant to 52 Pa. Code § 5.101(e), an Answer is not required until such Preliminary Objections are decided and the ALJ or Commission orders such an answer to be filed. The Commission denied CCWGT's Preliminary Objections by Order entered October 29, 2014, but that Order does not contain a date by which an Answer must be filed. Out of an abundance of caution, CCWGT is filing this Answer within 10 days of the entry of that Order.

3. Denied. It is denied that SPLP will transport propane to SPLP's Twin Oaks facility, or that such propane will be distributed to storage facilities or distribution terminals located within Pennsylvania, and strict proof thereof is demanded.

4. Denied. CCWGT lacks knowledge concerning SPLP's plans to install new pumps and valves stations. The remainder of the paragraph is an alleged legal conclusion to which no answer is required.

5. Denied. CCWGT lacks knowledge concerning SPLP's plans to house equipment. CCWGT also lacks knowledge concerning the reasons why SPLP filed this petition. The remainder of the paragraph is an alleged legal conclusion to which no answer is required.

6. Admitted.

7. Admitted.

8. Denied. It is denied that SPLP is a public utility as to the service it proposes to provide using the proposed building and facilities in West Goshen Township, and strict proof thereof is demanded. In addition, the paragraph contains alleged legal conclusions to which no answer is required.

9. Admitted.

10. The paragraph contains alleged legal conclusions to which no answer is required.

11. Admitted in part and denied in part. It is admitted that SPLP operates an integrated pipeline system. CCWGT lacks knowledge concerning the specific assets used in that system.

12. Denied. CCWGT lacks knowledge concerning SPLP's plans for the transportation of various products between various locations.

13. Denied. CCWGT lacks knowledge concerning SPLP's current use of pipeline assets west of Delmont, Pennsylvania, and the relevance of any such use to this proceeding is denied.

14. Denied. CCWGT lacks knowledge concerning the reasons why SPLP filed an application in 2013. The remainder of the paragraph is an alleged legal conclusion to which no answer is required.

15. The paragraph is an alleged legal conclusion to which no answer is required.

16. The paragraph is an alleged legal conclusion to which no answer is required.

17. The paragraph is an alleged legal conclusion to which no answer is required.

18. The paragraph is an alleged legal conclusion to which no answer is required.

19. Denied. CCWGT lacks knowledge concerning SPLP's planning and engineering for the project, the alleged shortage of propane in retail markets in Pennsylvania, and the expressions of interest by shippers to transport propane within Pennsylvania. CCWGT also denies that the proposed use of the pipeline in West Goshen Township would have any effect on the availability of propane in retail markets in Pennsylvania.

20. Admitted in part and denied in part. It is admitted that SPLP planned the project to be solely for the interstate transportation of petroleum products. It is denied that SPLP changed that plan. It is further denied that if SPLP did change its plan that the change was due to shipper demand and/or the public interest.

21. Admitted in part and denied in part. It is admitted that SPLP has filed the tariff supplement referred to in this paragraph. It is denied that SPLP will be able to begin providing intrastate transportation of propane during the 2014-2015 winter. CCWGT lacks knowledge

concerning the quantity of propane SPLP plans to deliver or the alleged safety benefits of transportation of propane by pipeline instead of truck.

22. Admitted in part and denied in part. It is admitted that SPLP filed to amend the abandonment order and an application to provide pipeline service in a portion of Washington County. It is denied that SPLP plans to offer intrastate deliveries of propane using the facilities.

23. Denied. CCWGT lacks knowledge concerning any of the alleged benefits of the project, and strict proof thereof is demanded.

24. The paragraph is an alleged legal conclusion to which no answer is required.

25. The paragraph is an alleged legal conclusion to which no answer is required.

26. The paragraph is an alleged legal conclusion to which no answer is required.

27. The paragraph is an alleged legal conclusion to which no answer is required.

28. Denied. CCWGT lacks knowledge concerning SPLP's reasons for failing to include copies of the relevant ordinances of West Goshen Township with its Amended Petition.

29. Denied. It is denied that SPLP is working with West Goshen Township or that West Goshen Township would improperly prevent SPLP from constructing any facilities that are necessary or proper for the service, accommodation, and convenience of the public. CCWGT lacks knowledge concerning SPLP's motivation for withdrawing its zoning application to West Goshen Township and instead filing the Amended Petition.

30. Denied. It is denied that a pump station in West Goshen Township is a necessary part of SPLP's project, and strict proof thereof is demanded.

31. Denied. It is denied that a pump station in West Goshen Township is a necessary part of SPLP's project, and strict proof thereof is demanded.

32. Denied. It is denied that valve control stations have any relevance to the Amended Petition concerning the construction of facilities in West Goshen Township.

33. Denied. CCWGT lacks knowledge concerning the specific facilities SPLP plans to construct in West Goshen Township. CCWGT further denies that the vapor combustion unit is not a "building."

34. Denied. It is denied that valve control stations have any relevance to the Amended Petition concerning the construction of facilities in West Goshen Township.

35. The paragraph is an alleged legal conclusion to which no answer is required.

36. Denied. It is denied that the location of the West Goshen pump station is reasonably necessary to ensure efficient and safe operation of the pipeline. It is further denied valve control stations have any relevance to the Amended Petition concerning the construction of facilities in West Goshen Township. It is further denied that the project has the stated benefits to the public.

37. The paragraph contains an alleged legal conclusion to which no answer is required. It is further denied that a general statement of policy can be used to justify the construction of specific facilities and buildings in a specific location.

38. Denied. It is denied that SPLP's situation of a pump station in West Goshen Township is reasonably necessary for the convenience and welfare of the public. It is further denied that valve control stations have any relevance to the Amended Petition concerning the construction of facilities in West Goshen Township.

WHEREFORE, CCWGT respectfully requests the Pennsylvania Public Utility Commission to deny SPLP's Amended Petition. CCWGT also respectfully requests that the Commission refer this matter to an Administrative Law Judge for discovery, the receipt of

testimony (including testimony at a public input hearing in West Goshen Township), cross-examination of witnesses, and such other process as is required.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Scott J. Rubin". The signature is fluid and cursive, with the first name "Scott" and last name "Rubin" clearly distinguishable.

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(Pa. Supreme Court ID: 34536)

Counsel for CCWGT

Dated: November 7, 2014

VERIFICATION

I, Allen R Feinberg, a member of Concerned Citizens of West Goshen Township, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 11/4/14

Allen R Feinberg

CERTIFICATE OF SERVICE

I hereby certify that I have caused to be served this day a true copy of the foregoing document upon the parties listed below by electronic mail (where an email address is shown) and U.S. mail, first-class, postage prepaid, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

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Dated: November 7, 2014


Scott J. Rubin
Counsel for CCWGT