



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

**RE: Answer to Sunoco Pipeline, L.P.'s Amended Petitions (Docket Nos. P-2014-**

Dear Secretary Chiavetta,

Enclosed please find for filing pursuant to 52 Pa. Code § 5.61 the Delaware Riverkeeper Network and the Delaware Riverkeeper's Answer with regard to Sunoco Pipeline L.P.'s Amended Petitions for a Finding That the Situation of Structures to Shelter Pump Station and Valve Control Stations is Reasonably Necessary for the Convenience and Welfare of the Public.

Dated: November 20, 2014

/s/ Aaron Stemplewicz

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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	:	Docket Nos. P-2014-2411941,
Shelter Pump Stations and Valve Control	:	2411942, 2411943, 2411944,
Stations is Reasonably Necessary for the	:	2411945, 2411946, 2411948,
Convenience and Welfare of the Public	:	2411950, 2411951, 2411952,
		2411953, 2411954, 2411956,
		2411957, 2411958, 2411960,
		2411961, 2411963, 2411964,
		2411965, 2411966, 2411967,
		2411968, 2411971, 2411972,
		2411974, 2411975, 2411976,
		2411977, 2411979, 2411980.

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**DELAWARE RIVERKEEPER NETWORK’S ANSWER TO SUNOCO PIPELINE, L.P.’S  
AMENDED PETITIONS**

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Pursuant to 52 Pa. Code § 5.61 the Delaware Riverkeeper Network and the Delaware Riverkeeper, Maya van Rossum (“DRN”), submit the following Answer with regard to Sunoco Pipeline L.P.’s (“Sunoco”) Amended Petitions for a Finding That the Situation of Structures to Shelter Pump Station and Valve Control Stations is Reasonably Necessary for the Convenience and Welfare of the Public (“Petitions”).

1. Denied. It is denied that Sunoco is a public utility corporation and strict proof thereof is demanded. In addition, the paragraph contains legal conclusions to which no answer is required.
2. Denied. DRN lacks sufficient information or knowledge as to the nature of the Mariner East project, use of the existing pipeline infrastructure and its planned extension of facilities, and strict proof thereof is demanded.

3. Denied. It is specifically denied that Sunoco holds a certificate of public convenience to provide petroleum product or refined petroleum product transportation service for a segment of its pipeline infrastructure from Mechanicsburg to Twin Oaks or to third-party storage facilities or distribution terminals in southeastern Pennsylvania. DRN lacks sufficient information or knowledge of any increased demand for intrastate transportation of propane or supply shortages of propane, and strict proof thereof is demanded.
4. Denied. DRN lacks sufficient information or knowledge in regard to Sunoco's plans to install new pump and valve stations at various segments along the pipeline, and strict proof thereof is demanded. The remainder of paragraph 4 consists of legal conclusions to which no answer is required.
5. Denied. DRN lacks sufficient information or knowledge concerning the reasons for Sunoco's plan to house equipment, and strict proof thereof is demanded. The remainder of paragraph 5 consists of legal conclusions to which no answer is required.
6. Admitted.
7. Admitted.
8. Denied. It is denied that Sunoco is a public utility as to the service it intends to provide using the proposed buildings and facilities cited in the petitions, and strict proof thereof is demanded. In addition, paragraph 8 contains legal conclusions to which no answer is required.
9. Admitted.
10. Denied. DRN lacks sufficient information or knowledge in regard to Sunoco's certificates of public convenience and prior Orders of the Commission, and strict proof thereof is

demanded. In addition, paragraph 10 contains legal conclusions to which no answer is required.

11. Denied. DRN lacks sufficient information or knowledge of Sunoco's specific assets used in its system, and strict proof thereof is demanded.
12. Denied. DRN lacks sufficient information or knowledge concerning Sunoco's plans for the transportation of various products between various locations, and strict proof thereof is demanded.
13. Denied. DRN lacks sufficient information or knowledge concerning Sunoco's current use of pipeline assets west of Delmont, Pennsylvania, and strict proof thereof is demanded.
14. Denied. DRN lacks sufficient information or knowledge concerning the reasons why Sunoco filed an application in 2013 to abandon service along portions of its pipeline, and strict proof thereof is demanded. The remainder of paragraph 14 is a legal conclusion to which no answer is required.
15. This paragraph is a legal conclusion to which no answer is required.
16. This paragraph is a legal conclusion to which no answer is required.
17. This paragraph is a legal conclusion to which no answer is required.
18. This paragraph is a legal conclusion to which no answer is required.
19. Denied. DRN lacks sufficient information or knowledge concerning Sunoco'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. DRN also lacks sufficient information or knowledge to admit or deny that the proposed use of the pipeline in would have an effect on the availability of propane in retail markets in Pennsylvania, and strict proof thereof is demanded.

20. Admitted in part and denied in part. It is admitted that Sunoco initially planned the project to be solely for the interstate transportation of petroleum products. It is denied that Sunoco changed that plan. It is further denied that if Sunoco did change its plan, that the change was due to shipper demand and/or the public interest, and strict proof thereof is demanded. It is denied that Sunoco will be offer more intrastate service as a result of the project, and strict proof thereof is demanded.
21. Admitted only that Sunoco intended to file a tariff supplement. DRN further lacks sufficient information or knowledge as to whether Sunoco will be able to begin providing intrastate transportation propane during the 2014-2015 winter, the quantity of propane Sunoco plans to deliver, or the alleged safety benefits of transportation of propane by pipeline, and strict proof thereof is demanded.
22. Denied. DRN lacks sufficient information or knowledge in regard to Sunoco's intent to amend the abandonment order or the application to provide pipeline service in a portion of Washington County. It is denied that Sunoco plans to offer intrastate deliveries of propane using the proposed facilities, or that it has legal authority to do so, and strict proof thereof is demanded.
23. Denied. DRN lacks sufficient information or knowledge concerning any of the alleged benefits of the project, and strict proof thereof is demanded.
24. This paragraph is a legal conclusion to which no answer is required.
25. This paragraph is a legal conclusion to which no answer is required.
26. This paragraph is a legal conclusion to which no answer is required.
27. This paragraph is a legal conclusion to which no answer is required.

28. Denied. DRN lacks sufficient information or knowledge concerning Sunoco's reasons for failing to include copies of the relevant local ordinances with its amended petition, but states that Sunoco must specify what ordinances or requirements are to be overridden by Commission action in this case.
29. Denied as stated. DRN lacks sufficient information or knowledge in regard to Sunoco's work with townships and whether one or more municipalities will seek to prevent Sunoco from constructing structures they seek to construct.
30. Denied. DRN lacks sufficient information or knowledge concerning the necessity for the pump stations, and strict proof thereof is demanded.
31. Denied. It is denied that pump stations are a necessary part of Sunoco's project, and strict proof thereof is demanded. DRN lacks sufficient information or knowledge concerning the necessity to site pump stations at specific locations and strict proof thereof is demanded.
32. Denied. DRN lacks sufficient information or knowledge as to safety enhancements or the operation of valve control stations, and strict proof thereof is demanded.
33. Denied. DRN lacks sufficient information or knowledge concerning the specific facilities Sunoco plans to construct, and/or which of those facilities would constitute "buildings," and strict proof thereof is demanded. To the extent paragraph 33 constitutes a legal conclusion, no answer is required.
34. Denied. DRN lacks sufficient information or knowledge concerning the valve control stations and power distribution centers that Sunoco plans to construct, and which of those facilities would constitute "buildings," and strict proof thereof is demanded.
35. This paragraph is a legal conclusion to which no answer is required.

36. Denied. DRN denies that the location of the pump stations is reasonably necessary to ensure efficient and safe operation of the pipeline, and strict proof thereof is demanded.
37. Denied. DRN denies that the approval of abandonment of service includes a finding of public benefits from a future service not before the Commission for any action in that proceeding, and strict proof thereof is demanded. Further, paragraph 37 contains a legal conclusion to which no answer is required.
38. Denied. It is denied that Sunoco's location of a pump stations or valve controls are reasonably necessary for the convenience and welfare of the public, and strict proof thereof is demanded.

Dated: 11-20-14

Respectfully Submitted by:

/s/ Aaron Stemplewicz

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*Counsel for Delaware Riverkeeper Network, and  
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**VERIFICATION**

I, Maya K. van Rossum, hereby state that the facts above set forth in the Answer are true and correct (or 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).

Dated: November 20, 2014

/s/ Maya K. van Rossum

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**CERTIFICATE OF SERVICE**

I, Aaron Stemplewicz, do hereby certify that a true and accurate copy of the foregoing ANSWER were served upon the following on November 20, 2014, pursuant to the requirements of 52 Pa. Code § 1.54(b)(3) (relating to service by a participant):

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