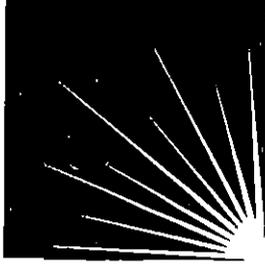


Clean Air Council



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PA P.U.C.
SECRETARY'S BUREAU

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

January 9, 2015

Re: First Set of Interrogatories and Request for Production of Documents of the Clean Air Council, Docket Nos. P-2014-2411941, et seq.

Dear Secretary Chiavetta,

Please find enclosed for filing the Certificate of Service evidencing service by the Clean Air Council on the parties of record of the First set of Interrogatories and Request for the Production of Documents of the Clean Air Council in the above-referenced proceedings.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Augusta Wilson".

Augusta Wilson, Esq.

PA Attorney #316969

Clean Air Council

135 S. 19th St., Ste. 300

Philadelphia, PA 19103

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BEFORE THE
COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PA P.U.C.
SECRETARY'S BUREAU

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.

**FIRST SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION OF
DOCUMENTS OF THE CLEAN AIR COUNCIL**

Pursuant to 52 Pa. Code § 5.341, the Clean Air Council hereby serves on Sunoco Pipeline, L.P. ("SPLP") the following First Set of Interrogatories and Requests for Production of Documents. SPLP shall respond to the following within 20 days of service:

Definitions

1. "Affiliate" or "Affiliated interest" means an affiliated interest as the term is defined in 66 Pa. C.S. § 2101(a).
2. "Commission" refers to the Pennsylvania Public Utility Commission.
3. "SPLP" refers to Sunoco Pipeline, L.P.
4. "Petition" or "Petitions" refers to the 31 Amended Petitions of Sunoco Pipeline, L.P., filed at Docket Nos. P-2014-2411941 et seq. on May 8, 2014.

5. "Communication" shall mean the transmittal of information or request for information in any form, including but not limited to by telephone, letter, email, during a meeting, or by any other means.
6. "Documents" shall mean all materials, including but not limited to any handwritten, printed, typed, photographic, recorded, filmed, or computer-generated materials of any kind or nature, however produced or reproduced, and includes drafts, revisions of drafts, preliminary and preparatory materials, alterations, modifications, amendments, any written comments concerning the foregoing, originals, copies, emails, attachments, exhibits, removable notes, and all translations and summaries thereof, in whatever form, stored or contained in or on whatever medium, including computerized memory or optical or magnetic media.
7. The terms "agent" or "agents" shall mean past or present agents or representatives, including attorneys and accountants.
8. The term "including" shall mean including without limitation.
9. The terms "all," "each," and "any" are used in their broadest sense and shall be construed as all and any.
10. The conjunctions "and" and "or" shall be construed either disjunctively or conjunctively, as necessary, to bring within the scope of a discovery request all responses that might otherwise be outside its scope.
11. The terms "concerning" and "concerns" shall mean, in whole or in part, referring to, describing, evidencing, constituting, containing, comprising, embodying, connected to, reflecting, analyzing, showing, discussing, identifying, illustrating, stating, regarding, supporting, refuting, rebutting, responding to, commenting on, evaluating, about, in

respect of, mentioning, dealing with, or in any way pertaining to, either explicitly or implicitly.

12. "Person" shall mean any natural person, alive or deceased, and/or any business, legal, or governmental entity or association.
13. The term "identify" with respect to persons shall mean to give, to the extent known, the person's full name, present or last known address and, when referring to a natural person, present or last known place of employment.
14. The term "identify" with respect to documents shall mean to give, to the extent known, the (i) type of document; (ii) general subject matter; (iii) date of the document; and (iv) author(s), addressee(s), and recipient(s).

Instructions

15. These interrogatories and requests for production of documents shall be deemed to be continuing. SPLP is obligated to change, supplement, and correct all answers within a reasonable time to conform to available information, including any information that becomes available after the answers are filed.
16. The answers should first restate the question asked and also identify the person or persons supplying the information. Each answer should begin on a separate page.
17. All information is to be divulged that is within the knowledge, possession, control, or custody of SPLP or any and all of its subsidiaries, affiliates, attorneys, agents, employees, or other representatives.
18. Use of the past tense includes the present tense unless otherwise explicitly stated.
19. Use of the singular form of any word includes the plural and vice versa.

20. No interrogatory shall be construed with reference to any other interrogatory for purposes of limitation.
21. If SPLP objects to the scope or breadth of any of these discovery requests, SPLP shall, to the extent possible, respond to the request notwithstanding its objection
22. *If any of these discovery requests cannot be answered in full, SPLP shall answer to the extent possible, specifying the reasons for its inability to answer the remainder and stating what information, knowledge or belief SPLP has concerning the unanswered portion.*
23. If SPLP claims any privilege with respect to any response to a discovery request, SPLP shall state the basis on which the privilege is claimed and appropriately identify any responsive documents or communications on its privileged document schedule.

Interrogatories

1. Identify by street address and geographic coordinates the specific physical location on which SPLP proposes to construct each of the valve stations and pumping stations referred to in its Amended Petitions.
2. Provide site plans and specifications for each of the valve stations and pumping stations referred to in the Amended Petitions. Include the location of all existing and planned structures on the properties, including access roads and other paved areas.
3. Identify by street address and geographic coordinates the specific physical location of any and all existing pump stations and valve control stations connected to the Mariner East pipeline.
 - a. Describe the operational status of any such facilities identified.

4. What types of vehicles will have access to the sites for the valve stations and pumping stations referred to in the Petitions during the construction process for the proposed Mariner East pipeline?
5. What types of vehicles will have access to the sites for the valve stations and pumping stations referred to in the Petitions during operation of the proposed Mariner East pipeline?
6. What is the maximum size of vehicle that can be accommodated at the sites for the valve stations and/or pumping stations referred to in the Petitions?
7. Has SPLP generated or carried out any projections, models or estimates in any other form of the air pollution that will be emitted during the construction phase of the project and/or during regular operation of the proposed Mariner East pipeline? If so, produce any such projections, models or estimates in whatever form they exist.
8. Provide any studies or models SPLP has carried out or commissioned relating to environmental impacts of the Mariner East pipeline, including but not limited to impacts on air quality, endangered or threatened species, noise impacts, forested lands, or wetlands, as well as any supporting documentation relating to any such studies.
 - a. Identify the individuals involved in the carrying out and/or commissioning of any such studies.
9. Provide any studies SPLP has carried out or commissioned relating to safety issues surrounding the Mariner East pipeline, as well as any supporting documentation relating to any such studies.
 - a. Identify the individuals involved in the carrying out and/or commissioning any such study.

10. Has SPLP begun filling the Mariner East pipeline or any portion of the Mariner East pipeline? If so:

- a. State when such filling began;
- b. State which portion or portions of the pipeline has/have been filled;
- c. State what the pipeline has been filled with, e.g., ethane, propane, butane.
- d. Identify any document(s) SPLP relies on for its authority to begin filling the pipeline before the instant proceeding is resolved.

11. Has SPLP put the Mariner East pipeline or any portion of the Mariner East pipeline into service? If so:

- a. State when such event took place;
- b. State which portion or portions of the pipeline have been put into service;
- c. State what product or products are being transported through the pipeline, e.g., ethane, propane, butane.

12. Is it currently possible to input ethane, propane, or any other product into the Mariner East pipeline for delivery to the Twin Oaks facility?

- a. If so, identify the physical location, by geographic coordinates and address, of all such existing access points.
- b. Provide all existing plans or schematics concerning any such access points.

13. Does SPLP plan to construct any new access points on the Mariner East pipeline where it is possible to input ethane, propane, or any other product into the pipeline for delivery to the Twin Oaks facility?

- a. If so, identify the planned physical location, if known, by geographic coordinates and address, of all such planned new access points.

- b. Provide any and all existing plans or schematics concerning such planned new access points.
14. Identify all permits, licenses or other authorizations, besides the Petitions, that SPLP needs before:
 - a. Initiation and/or completion of construction of the valve stations and pumping stations referred to in the Petitions;
 - b. The Mariner East pipeline can be placed into full service.
15. For each permit, license or other authorization identified in response to the previous request:
 - a. Identify the agency or other governmental entity to which SPLP would need to apply; and
 - b. State the status of the application including, for any applications not yet filed, the date on which SPLP intends to apply.
16. Identify each witness SPLP intends to call as part of its direct case for all dockets relating to all of its Petitions. For each such witness, provide a copy of the witness's curriculum vitae, including a list of all matters in which the witness has testified in his or her professional capacity.
17. Provide any and all correspondence and other documents concerning the determination by the Pennsylvania Department of Environmental Protection that "the emissions from these [vapor combustion units] have a *de minimus* environmental impact," as stated in the footnote on page 14 of the Petitions.

18. Describe the reasons for SPLP's decisions to site each of the proposed pumping stations and valve stations where they are currently proposed. Provide all studies, correspondence and other documents relating to such siting decisions.
19. Identify each shipper that has entered into an agreement with SPLP concerning the *Mariner East pipeline* – both uncommitted shippers and committed shippers.
 - a. Identify and produce the service contracts for all such shippers, both committed and uncommitted, including the date and signatory parties.
 - b. Identify and produce any documents containing or concerning the tariffs that will establish the technical requirements, delivery points, and any other terms or conditions of service.
20. Are there circumstances under which SPLP could deny either a committed or uncommitted shipper's request for service? If so, describe those circumstances.
21. Has SPLP denied any request by any shipper or shippers, either committed or uncommitted, for service on the *Mariner East pipeline*? If so identify which shipper or shippers, and describe the reasons for SPLP's denial.
22. Are any of the shippers – either committed or uncommitted – who have entered into an agreement with SPLP concerning the *Mariner East pipeline* owned in whole or in part, operated in whole or in part, or otherwise affiliated with SPLP?
23. Provide all data, correspondence, or other documents that form the basis of SPLP's assertion that there was "increased interest expressed by shippers in securing *intrastate* pipeline transportation facilities sooner than originally anticipated . . ." as stated in the Amended Petitions in paragraph 20.

24. When did SPLP become aware that there was increased interest by shippers in intrastate pipeline transportation facilities and/or that business conditions had changed?
- a. Provide all documents relied upon by SPLP in its determination that shipper interest and/or business conditions had changed.
 - b. Identify all SPLP personnel responsible for evaluating such shipper interest and/or business conditions.
 - c. Identify any non-SPLP personnel relied upon by SPLP in evaluating such shipper interest and/or business conditions.
25. When did SPLP make the decision to alter its plans for the Mariner East pipeline to include the potential for delivery of some product to SPLP's Twin Oaks facility?
- a. Provide all correspondence, data, and other documents relating to this decision.
 - b. Identify the individuals who were involved in making this decision
26. Provide all data, correspondence, or other documents that form the basis of SPLP's assertion that Pennsylvania has experienced "severe shortages of propane during periods of peak demand like the 2013-2014 winter season" as stated in the Amended Petitions in paragraph 19.
27. Provide all data, correspondence, or other documents that form the basis of SPLP's assertion that propane shipped through the Mariner East pipeline will be used for residential heating purposes.
28. Identify any employees, agents or affiliates of SPLP who were involved in the drafting and submission of SPLP's original or amended Petitions to the Pennsylvania Public Utility Commission.

29. Describe which products SPLP plans to deliver through the Mariner East pipeline at which times; specifically:

- a. What product or products e.g., ethane, propane, butane, would be delivered through the Mariner East pipeline when it first went into service?
- b. If the pipeline would carry multiple products, in what ratios would they be carried?
- c. If SPLP plans to alter the product or the ratio of products shipped through the pipeline, describe what changes SPLP plans to make, when, and the reason for such planned changes.
- d. Provide all correspondence and other documents relating to any decision to alter the product or ratio of products shipped through the pipeline over time.
- e. If the product or ratio of products that will be shipped to the Marcus Hook Industrial Complex will or could differ from that which will be shipped to the Twin Oaks facility at any point, describe the difference and the reasons for it.

30. Will the Mariner East pipeline stop carrying propane at any point? If so, state when and provide any correspondence or other documents relating to the decision to have the pipeline stop carrying propane.

31. Describe whether any product delivered through the Mariner East pipeline to the Twin Oaks facility will be processed, refined, distilled, or otherwise treated in any way before it is distributed.

- a. To the extent that the answer to Interrogatory 31 is yes, describe the processes, refining or distillation methods such product would undergo, and which product or products would be subject to such processes.

32. Can SPLP operate the Mariner East pipeline at a profit if the product transported through the pipeline is only delivered intrastate in Pennsylvania and no product is contracted to shippers who deliver it out of state or to foreign countries?
33. When the Mariner East pipeline operated in an east-to-west direction:
- a. What was the operating pressure or what were the operating pressures at which the pipeline operated?
 - b. At what velocity or velocities did product move through the pipeline?
 - c. Identify and produce any documents relied on by SPLP in answering Interrogatory 33.
34. If the Mariner East pipeline is currently operating:
- a. At what operating pressure or pressures is the pipeline operating?
 - b. At what velocity or velocities is product moving through the pipeline?
 - c. Identify and produce any documents relied on by SPLP in answering Interrogatory 34.
35. As currently proposed, at what operating pressure or pressures would the Mariner East pipeline operate once fully operational?
- a. If the operating pressure or pressures would change over time, describe how, where and why they would change.
 - b. Identify and produce any documents relied on by SPLP in answering Interrogatory 35.
36. As currently proposed, at what velocity or velocities would product move through the Mariner East pipeline once fully operational?

a. If the velocity or velocities would change over time, describe how, where and why they would change.

b. Identify and produce any documents relied on by SPLP in answering

Interrogatory 36.

37. What individual(s), entity or entities currently own natural gas liquids (NGLs) that would be transported through the Mariner East pipeline as proposed?

38. Are NGLs that would be transported through the Mariner East pipeline currently being stored?

a. If so, describe where such NGLs are being stored and what individual(s), entity or entities own the facilities or locations where such NGLs are being stored.

39. As the project is currently proposed, is it possible for product delivered through the Mariner East pipeline to the Twin Oaks facility to only be stored there and later delivered to the Marcus Hook Industrial Complex?

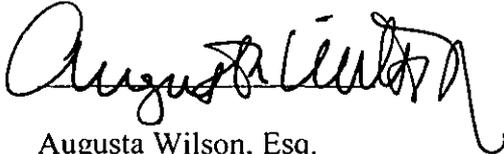
40. Will all product delivered to Twin Oaks be shipped to consumers directly from Twin Oaks?

41. What percentage of the product delivered through the Mariner East pipeline will ultimately be delivered to consumers in states other than Pennsylvania?

42. What percentage of the product delivered through the Mariner East pipeline will ultimately be delivered to foreign markets?

Dated January 9, 2015

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Augusta Wilson". The signature is fluid and cursive, with a long, sweeping tail that extends to the right.

Augusta Wilson, Esq.
PA Attorney # 316969
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215.567.4004 ext. 106
awilson@cleanair.org

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CERTIFICATE OF SERVICE

PA P.U.C.
SECRETARY'S BUREAU

I hereby certify that on January 9, 2015, I caused a true copy of the First Set of Interrogatories and First Request for Documents of the Clean Air Council to be served on the participants listed below in accordance with the requirements of 52 Pa. Code § 1.54, relating to .

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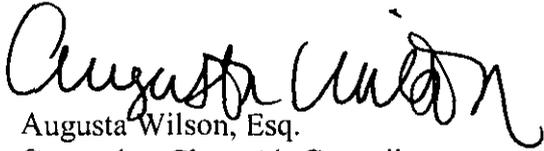
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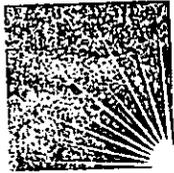
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Augusta Wilson, Esq.
Counsel to Clean Air Council

Dated: January 9, 2015

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SECRETARY'S BUREAU



Clean Air Council

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Suite 300
Philadelphia, PA 19103



Pennsylvania Public Utility Comm'n
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