**BEFORE THE**

**PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Sunoco Pipeline, L.P. :

for a finding that a building to shelter the :

Walnut Bank valve control station :

in Wallace Township, Chester County, : P-2014-2411941

Pennsylvania is reasonably necessary for the :

convenience or welfare of the public :

Petition of Sunoco Pipeline, L.P. :

for a finding that a building to shelter the :

Blairsville pump station :

in Burrell Township, Indiana County, : P-2014-2411942

Pennsylvania is reasonably necessary for the :

convenience or welfare of the public :

Petition of Sunoco Pipeline, L.P. :

for a finding that a building to shelter the :

Middletown Junction valve control station :

in Lower Swatara Township, Dauphin County, : P-2014-2411943

Pennsylvania is reasonably necessary for the :

convenience or welfare of the public :

Petition of Sunoco Pipeline, L.P. :

for a finding that a building to shelter the :

Cramer pump station :

in East Wheatfield Township, Indiana County, : P-2014-2411944

Pennsylvania is reasonably necessary for the :

convenience or welfare of the public :

Petition of Sunoco Pipeline, L.P. :

for a finding that a building to shelter the :

Old York Road valve control station :

in Fairview Township, York County, : P-2014-2411945

Pennsylvania is reasonably necessary for the :

convenience or welfare of the public :

Petition of Sunoco Pipeline, L.P. :

for a finding that a building to shelter the :

Conodoquist River West valve control station :

in North Middleton Township, Cumberland : P-2014-2411946

County, Pennsylvania is reasonably necessary :

for the convenience or welfare of the public :

Petition of Sunoco Pipeline, L.P. :

for a finding that a building to shelter the :

Juniata River West valve control station :

in Frankston Township, Blair : P-2014-2411948

County, Pennsylvania is reasonably necessary :

for the convenience or welfare of the public :

Petition of Sunoco Pipeline, L.P. :

for a finding that a building to shelter the :

Ebensburg pump station :

in Cambria Township, Cambria County, : P-2014-2411950

Pennsylvania is reasonably necessary for the :

convenience or welfare of the public :

Petition of Sunoco Pipeline, L.P. :

for a finding that a building to shelter the :

West Conemaugh River valve control station :

in Derry Township, Westmoreland : P-2014-2411951

County, Pennsylvania is reasonably necessary :

for the convenience or welfare of the public :

Petition of Sunoco Pipeline, L.P. :

for a finding that a building to shelter the :

West Loyalhanna Dam valve control station :

in Loyalhanna Township, Westmoreland : P-2014-2411952

County, Pennsylvania is reasonably necessary :

for the convenience or welfare of the public :

Petition of Sunoco Pipeline, L.P. :

for a finding that a building to shelter the :

Old Chestnut Lane valve control station :

in Penn Township, Westmoreland : P-2014-2411953

County, Pennsylvania is reasonably necessary :

for the convenience or welfare of the public :

Petition of Sunoco Pipeline, L.P. :

for a finding that a building to shelter the :

Old Harmony Road valve control station :

in Hempfield Township, Westmoreland : P-2014-2411954

County, Pennsylvania is reasonably necessary :

for the convenience or welfare of the public :

Petition of Sunoco Pipeline, L.P. :

for a finding that a building to shelter the :

Youghiogheny River South valve control station :

in Rostraver Township, Westmoreland : P-2014-2411956

County, Pennsylvania is reasonably necessary :

for the convenience or welfare of the public :

Petition of Sunoco Pipeline, L.P. :

for a finding that a building to shelter the :

Hollidaysburg pump station :

in Allegheny Township, Blair County, : P-2014-2411957

Pennsylvania is reasonably necessary for the :

convenience or welfare of the public :

Petition of Sunoco Pipeline, L.P. :

for a finding that a building to shelter the :

Monongahela River West valve control station :

in Union Township, Washington : P-2014-2411958

County, Pennsylvania is reasonably necessary :

for the convenience or welfare of the public :

Petition of Sunoco Pipeline, L.P. :

for a finding that a building to shelter the :

Ross Road valve control station :

in North Strabane Township, Washington : P-2014-2411960

County, Pennsylvania is reasonably necessary :

for the convenience or welfare of the public :

Petition of Sunoco Pipeline, L.P. :

for a finding that a building to shelter the :

Marklesburg pump station and :

Raystown Lake West valve control station : P-2014-2411961

in Penn Township, Huntingdon County, :

Pennsylvania is reasonably necessary for the :

convenience or welfare of the public :

Petition of Sunoco Pipeline, L.P. :

for a finding that a building to shelter the :

Houston-Mark West, Houston-Williams :

and West Pike Street valve control stations :

in Chartiers Township, Washington : P-2014-2411963

County, Pennsylvania is reasonably necessary :

for the convenience or welfare of the public :

Petition of Sunoco Pipeline, L.P. :

for a finding that a building to shelter the :

Mount Union pump station :

in Shirley Township, Huntingdon County, : P-2014-2411964

Pennsylvania is reasonably necessary for the :

convenience or welfare of the public :

Petition of Sunoco Pipeline, L.P. :

for a finding that a building to shelter the :

Twin Oaks pump station :

in Upper Chichester Township, Delaware County, : P-2014-2411965

Pennsylvania is reasonably necessary for the :

convenience or welfare of the public :

Petition of Sunoco Pipeline, L.P. :

for a finding that a building to shelter the :

Doylesburg pump station :

in Toboyne Township, Perry County, : P-2014-2411967

Pennsylvania is reasonably necessary for the :

convenience or welfare of the public :

Petition of Sunoco Pipeline, L.P. :

for a finding that a building to shelter the :

Eagle pump station :

in Upper Uwchlan Township, Chester County, : P-2014-2411968

Pennsylvania is reasonably necessary for the :

convenience or welfare of the public :

Petition of Sunoco Pipeline, L.P. :

for a finding that a building to shelter the :

Beckersville pump station :

in Brecknock Township, Berks County, : P-2014-2411971

Pennsylvania is reasonably necessary for the :

convenience or welfare of the public :

Petition of Sunoco Pipeline, L.P. :

for a finding that a building to shelter the :

Montello pump station and valve control station :

in Spring Township, Berks County, : P-2014-2411972

Pennsylvania is reasonably necessary for the :

convenience or welfare of the public :

Petition of Sunoco Pipeline, L.P. :

for a finding that a building to shelter the :

Mechanicsburg pump station :

in Hampden Township, Cumberland County, : P-2014-2411974

Pennsylvania is reasonably necessary for the :

convenience or welfare of the public :

Petition of Sunoco Pipeline, L.P. :

for a finding that a building to shelter the :

Blainsport pump station :

in West Cocalico Township, Lancaster County, : P-2014-2411975

Pennsylvania is reasonably necessary for the :

convenience or welfare of the public :

Petition of Sunoco Pipeline, L.P. :

for a finding that a building to shelter the :

Middletown pump station :

in Londonderry Township, Dauphin : P-2014-2411976

Pennsylvania is reasonably necessary for the :

convenience or welfare of the public :

Petition of Sunoco Pipeline, L.P. :

for a finding that a building to shelter the :

Cornwall pump station :

in West Cornwall Township, Lebanon County, : P-2014-2411977

Pennsylvania is reasonably necessary for the :

convenience or welfare of the public :

Petition of Sunoco Pipeline, L.P. :

for a finding that a building to shelter the :

Plainfield pump station : P-2014-2411979

in Lower Frankford Township, Cumberland :

County, Pennsylvania is reasonably necessary :

for the convenience or welfare of the public :

Petition of Sunoco Pipeline, L.P. :

for a finding that a building to shelter the :

Delmont pump station : P-2014-2411980

in Salem Township, Westmoreland :

County, Pennsylvania is reasonably necessary :

for the convenience or welfare of the public :

**ORDER GRANTING MOTION FOR PROTECTIVE ORDER**

On February 17, 2015, Sunoco Pipeline, L.P. (Sunoco) filed a motion requesting that we issue a protective order in this proceeding, pursuant to 52 Pa.Code § 5.365(a) and enclosing a proposed order with its motion. Sunoco alleges in its motion that Proprietary Information as described in 52 Pa.Code § 5.365 has been requested during the course of these proceedings.

The motion asserts that parties to this proceeding have sought in information that is customarily treated as sensitive, proprietary or highly confidential, such as information related to Sunoco’s customers. In addition parties have sought information concerning the location of certain pump stations, valve control stations and other public utility facilities, which would raise critical infrastructure security concerns.

Sunoco’s motion argues that unrestricted disclosure of such information would not be in the public interest. According to Sunoco’s motion, these considerations constitute cause for the restriction set forth in 52 Pa.Code §5.365. The parties represented by counsel do not object to the motion.

The Commission’s Rules of Practice and Procedure permit the Commission to issue protective orders limiting the availability of certain trade secret or other confidential information. 52 Pa.Code §5.365. The party seeking the protective order has the burden to establish that the potential harm to the party providing the information would be substantial and the harm to the party if the information is disclosed without restriction outweighs the public’s interest in free and open access to the administrative hearing process. 52 Pa.Code §5.365(a), Petition for Protective Order of GTE North Inc., 1996 Pa PUC LEXIS 95, Docket No. G-00940402, (Order entered August 8, 1996); ITT Communications Services’ Petition for a Protective Order, 1991 Pa PUC LEXIS 193, Docket No. R-912017, (Order entered November 5, 1991)

In determining whether to issue a protective order, the Commission, pursuant to 52 Pa.Code §5.365(a), should consider the following factors:

(1)  The extent to which the disclosure would cause unfair economic or competitive damage.

    (2)  The extent to which the information is known by others and used in similar activities.

    (3)  The worth or value of the information to the party and to the party’s competitors.

(4)  The degree of difficulty and cost of developing the information.

    (5)  Other statutes or regulations dealing specifically with disclosure of the information.

The proposed protective order defines protected information as Proprietary Information. Proprietary Information consists of materials that are not available to the public and which, if disclosed freely, would subject the party or its clients to risk of competitive disadvantage or other business injury. The proposed protective order gives all parties the right to challenge the confidential or proprietary nature of the designated Proprietary Information.

The Commission’s regulation at 52 Pa.Code §5.365 requires that a protective order apply the least restrictive means of limitation that will provide the necessary protections from disclosure. The proposed protective order does this. Therefore, we will grant Sunoco’s motion filed February 17, 2015 for issuance of a protective order.

THEREFORE,

IT IS ORDERED:

1. That the motion for issuance of a protective order filed February 17, 2015 by Sunoco Pipeline, L.P. is granted.

2. The proposed protective order attached to the motion filed February 17, 2015 is approved, adopted and incorporated into this order. A copy of the protective order is attached.

Date: February 23, 2015 \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

David A. Salapa

Administrative Law Judge

Elizabeth H. Barnes

Administrative Law Judge

**COMMONWEALTH OF PENNSYLVANIA**

**BEFORE THE**

**PENNSYLVANIA PUBLIC UTILITY COMMISSION**

|  |  |  |
| --- | --- | --- |
| Amended 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 and Welfare of the Public | ::::::::::: | Docket Nos. P-2014-2411941, 2411942, 2411943, 2411944, 2411945, 2411946, 2411948, 2411950, 2411951, 2411952, 2411953, 2411954, 2411956, 2411957, 2411958, 2411960, 2411961, 2411963, 2411964, 2411965, 2411967, 2411968, 2411971, 2411972, 2411974, 2411975, 2411976, 2411977, 2411979, 2411980  (Not Consolidated – Not including 2411966 related to West Goshen Township) |

PROTECTIVE ORDER

FOR THE DISCOVERY OF

PROPRIETARY INFORMATION

WHEREAS, the parties whose signatures appear below have stipulated to the signing and entry of this Protective Order for the Discovery of Confidential and/or Proprietary Information (“Protective Order”), IT IS HEREBY ORDERED that each of the signing parties and their counsel shall be governed by the following terms and conditions concerning Confidential and/or Proprietary Information in the above-captioned action:

# This Protective Order is hereby GRANTED with respect to all materials and information identified at Ordering Paragraphs 2 and 3 herein which are filed with the Pennsylvania Public Utility Commission (the “Commission”), produced in discovery, or otherwise presented during these proceedings. All persons now and hereafter granted access to the materials and information identified in Ordering Paragraphs 2 and 3 shall use and disclose such information only in accordance with this Order.

# The materials subject to this Order are all correspondence, documents, data, information, studies, methodologies and other materials in any form that a party or an affiliate of a party furnishes in this proceeding pursuant to the Commission’s rules and regulations, discovery procedures, or cross-examination which are claimed to be of a proprietary or confidential nature and which are designated “PROPRIETARY” (hereinafter collectively referred to as “Proprietary Information”).

# Categories of Protected Information.

# Basis for Designation of Proprietary Information. Information may be designated as “Proprietary” based upon a good faith belief that the information constitutes or contains information of the designating party which is not available to the general public and the release of which will cause negative economic or competitive impacts for the designating party, including, but not limited to, trade secrets, know-how, proprietary data and/or other medical, technical, commercial, business, financial or personal information.

# Dispute Mechanism for Modification to Categories. The parties reserve the right to add additional areas covered under “Proprietary,” if a party later determines that a particular document should be protected by the designation but for some reason the document does not fall under the above category of protected information. If a party decides that it must modify the particular category to include or exclude a document(s), the party shall notify the opposing party of its intention to modify the category of protected documents and state precisely the proposed modified category. The document(s) in question should be produced to the opposing counsel in the proprietary category. Once the designating party requests a modification of a category to include a document, the document may only be viewed by opposing counsel in the “Proprietary” Category, unless or until the Administrative Law Judge(s), the Commission, or Court rule(s) otherwise. The parties shall attempt in good faith to resolve any dispute that may arise and should only seek appropriate application with the Court in order to protect the rights created by this Agreement. Within ten (10) business days of a notice, the opposing party shall either (i) grant the requested broadening of the category, or (ii) file a motion with the adjudicating body requesting a determination by the Administrative Law Judge(s), the Commission, or Court as to whether the requested modification to the “Proprietary,” or,” category shall be permitted. If the party opposing the modification fails to file a motion within ten (10) business days as stated, the party shall be deemed to have granted the modification of the category.

# Proprietary Information shall be made available to the Commission and its Staff for use in this proceeding. For purposes of filing, to the extent that Proprietary Information is placed in the Commission’s report folders, such information shall be handled in accordance with routine Commission procedures inasmuch as the report folders are not subject to public disclosure. To the extent that Proprietary Information is placed in the Commission’s testimony or document folders, such information shall be separately bound, conspicuously marked, and accompanied by a copy of this Order. Public inspection of Proprietary Information shall be permitted only in accordance with this Order.

# Permissible Use of Proprietary Information. Any person having access to Proprietary Information shall use it only for the purposes of this litigation (including appeals); shall not disclose it to anyone other than those persons designated herein; and shall handle it in the manner set forth in this Agreement. The designation of material as Proprietary shall not itself affect the rights of the designator (or the designator’s authorized representative) to give or disclose the Proprietary Information to any person for any reason, and such giving or disclosing of Proprietary information shall not be deemed a waiver of this Agreement, unless such information is made publically available by designator.

# Proprietary Information shall be made available to counsel of record in this proceeding pursuant to the following procedures:

## Proprietary Information. To the extent required for participation in this proceeding, a party’s counsel may afford access to Proprietary Information made available by another party (“the Producing Party”) to:

* + 1. The Commission at any hearing in this proceeding or in connection with motions filed in this proceeding;
    2. Counsel of record for all named parties to this action and their immediate supervisor;
    3. Other counsel not of record, not to exceed five (5) individuals, provided only that said individuals are duly employed on a full-time basis with the organizations that are named parties to this action.
    4. Court reporters;
    5. Any witness during the course of that witness’s deposition or examination;
    6. Experts and/or advisors consulted by the named parties or their counsel in connection with this action, whether or not retained to testify at trial, ***provided that*** prior to any such disclosure counsel for the party making the disclosure shall deliver a copy of this Protective Order to the expert and/or advisor, shall explain its terms to the expert and/or advisor, and shall secure the signature of the expert and/or advisor on a letter in the form attached hereto as **Appendix A**. It shall be the further obligation of counsel, upon learning of any breach or threatened breach of this Protective Order by any expert and/or advisor, promptly to notify opposing counsel of such breach or threatened breach;
    7. Corporate, business, non-profit, or association representatives selected by each corporate, business, non-profit, or association party to this litigation; and
    8. The Executive Director of any organization that is a named party to this proceeding. The “Executive Director” as used herein, shall mean the full time employee of the organization with day-to-day managerial responsibility for all operations of the organization.
  1. For purposes of the foregoing paragraphs, disclosure to a party’s expert(s) shall be subject to the following additional restrictions:
     1. Such expert(s) may not hold any of the following positions with any competitor of the producing party: (a) an officer, board member, significant stockholder, partner, owner (other than owner of stock) or an employee of any competitor of the producing party who is primarily involved in the pricing, development, and/or marketing of products or services that are offered in competition with those of the producing party; or (b) an officer, board member, significant stockholder, partner, owner (other than owner of stock) of any affiliate of a competitor of the producing party; provided, however, that any expert shall not be disqualified on account of being a stockholder, partner, or owner unless his/her interest in the business constitutes a significant potential for violation of the limitations of permissible use of the Proprietary Information. For purposes of this Order, stocks, partnership, or other ownership interest valued at more than $10,000 or constituting more than a 1% interest in a business establishes a significant potential for violation.
     2. If a party’s independent expert, another member of the independent expert’s firm or the independent expert's firm generally also serves as an expert for, or as a consultant or advisor to a competitor or any affiliate of a competitor of the Producing Party, said independent expert must: (1) advise the Producing Party of the competitor's or affiliate's name(s); (2) make reasonable attempts to segregate those personnel assisting in the expert’s participation in this proceeding from those personnel working on behalf of a competitor or any affiliate of a competitor of the Producing Party; and (3) if segregation of such personnel is impractical, the independent expert shall give to the Producing Party written assurances that the lack of segregation will in no way jeopardize the interests of the Producing Party. The Producing Party retains the right to challenge the adequacy of the written assurances that its interests will not be jeopardized.
  2. No other persons may have access to the Proprietary Information except as authorized by order of the Commission or of the presiding Administrative Law Judge. No person who may be entitled to receive or who is afforded access to any Proprietary Information shall use or disclose such information for the purposes of business or competition, or for any purpose other than the preparation for and conduct of this proceeding or any administrative or judicial review thereof.

1. Prior to making Proprietary Information available to any person as provided in above, counsel for a party of record shall deliver a copy of this Order to such person and shall receive a written acknowledgement from that person in the form attached to this Order and designated as “**Appendix A**”. Counsel shall promptly deliver to the Producing Party a copy of this executed acknowledgement form.
2. A producing party shall designate data or documents as constituting or containing Proprietary Information by affixing an appropriate proprietary stamp or typewritten or handwritten designation on such data or documents. Where only part of data compilations or multi-page documents constitutes or contains Proprietary Information, the producing party, insofar as reasonably practicable within discovery and other time constraints imposed in this proceeding, shall designate only the specific data or pages of documents that constitute or contain Proprietary Information.
3. Any federal agency that has access to and/or receives copies of the Proprietary Information will consider and treat the Proprietary Information as within the exemption from disclosure provided in the Freedom of Information Act as set forth at 5 U.S.C. § 552(b)(4) until such time as the information is found to be non-proprietary.
4. Any state agency, local agency, or municipality which has access to and/or receives copies of the Proprietary Information will consider and treat the Proprietary Information as “Confidential Proprietary Information” that is exempt from disclosure under Section 708(b)(11) of the Pennsylvania Right-to-Know Law (65 P.S. § 67.708(b)(11)) until such time as the information is found to be non-proprietary.
5. Any public reference to Proprietary Information by the Commission or by counsel or persons afforded access thereto shall be to the title or exhibit reference in sufficient detail to permit persons with access to the Proprietary Information to fully understand the reference and not more. The Proprietary Information shall remain a part of the record, to the extent admitted, for all purposes of administrative or judicial review.
6. Part of any record of any of proceedings containing the Proprietary Information, including but not limited to all exhibits, writings, testimony, cross examination, argument, and responses to discovery, and including reference thereto as mentioned in Ordering Paragraph No. 11, above, shall be sealed for all purposes, including administrative and judicial review, unless such Proprietary Information is released from the restrictions of this Protective Order, either through the agreement of the parties or pursuant to an order of an Administrative Law Judge or the Commission. Unresolved challenges arising under Ordering Paragraph No. 13, below, shall be decided on motion or petition by the presiding officer and/or the Commission as provided in 52 Pa. Code § 5.365(a). All such challenges will be resolved in conformity with existing rules, regulations, orders, statutes, and precedent to the extent such guidance is available.
7. The parties affected by the terms of this Protective Order shall retain the right to question or challenge the confidential or proprietary nature of Proprietary Information; to question or challenge the admissibility of Proprietary Information on any proper ground, including but not limited to irrelevance, immateriality or undue burden; to seek an order permitting disclosure of Proprietary Information beyond that allowed in this Protective Order; and to seek additional measures of protection of Proprietary Information beyond those provided in this Protective Order. If a challenge is made to the designation of a document or information as Proprietary, the party claiming that the information is Proprietary retains the burden of demonstrating that the designation is necessary and appropriate.
8. Upon completion of this proceeding, including any administrative or judicial review thereof, all copies of all documents and other materials, that contain any Proprietary Information, shall be immediately returned upon request to the party furnishing such Proprietary Information. In the alternative, parties may provide an affidavit of counsel affirming that the materials containing or reflecting Proprietary Information have been destroyed. This provision shall not apply to the Commission and its Staff.
9. Nothing contained in this Protective Order shall be construed as inferring that any Proprietary Information must be produced. Rather, this Protective Order is intended to set forth how Proprietary Information shall be handled by other parties to this matter if voluntarily or upon Order of the Commission are produced to other parties in this matter.

SO AGREED:

Dated: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Christopher A. Lewis, Esquire

Michael L. Krancer, Esquire

Frank L. Tamulonis, Esquire

Melanie S. Carter, Esquire

BLANK ROME LLP

One Logan Square

Philadelphia, PA 19103

*Counsel for Sunoco Pipeline L.P.*

Dated:

Augusta Wilson, Esquire

Joseph O. Minott, Esquire

135 S. 19th St

Suite 300

Philadelphia, PA 19103

*Counsel for Clean Air Council*

Dated:

Aaron Stemplewicz, Esquire

925 Canal Street

Suite 3701

Bristol, PA 19007

*Counsel for Delaware Riverkeeper Network*

SO ORDERED AND APPROVED:

Dated:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Administrative Law Judge

Dated:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Administrative Law Judge

**APPENDIX A**

**COMMONWEALTH OF PENNSYLVANIA**

**BEFORE THE**

**PENNSYLVANIA PUBLIC UTILITY COMMISSION**

|  |  |  |
| --- | --- | --- |
| Amended 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 and Welfare of the Public | ::::::::::: | Docket Nos. P-2014-2411941, 2411942, 2411943, 2411944, 2411945, 2411946, 2411948, 2411950, 2411951, 2411952, 2411953, 2411954, 2411956, 2411957, 2411958, 2411960, 2411961, 2411963, 2411964, 2411965, 2411967, 2411968, 2411971, 2411972, 2411974, 2411975, 2411976, 2411977, 2411979, 2411980  (Not Consolidated– Not including 2411966 related to West Goshen Township) |

The undersigned has read and understands the Protective Order issued in the above-captioned proceeding, which deals with the treatment of Proprietary Information. The undersigned agrees to be bound by, and comply with, the terms and conditions of said Protective Order. In the case of an independent expert, the undersigned represents that he/she has complied with the terms of the Protective Order prior to submitting this Affidavit. The undersigned agrees that any Proprietary Information, as addressed and defined in the Protective Order, shall be used and disclosed only for purposes of preparation for, and the conduct of, the above-captioned proceeding, and any administrative or judicial review thereof, and shall not be disclosed or used for any other purposes whatsoever. The undersigned agrees that, following the conclusion of this litigation, he/she will return or destroy all Proprietary Information.

The undersigned further agrees to be bound by the terms of the Protective Order and to subject himself/herself to the jurisdiction of the administrative and judicial bodies of the Commonwealth of Pennsylvania for the enforcement of this Order and understands that, in the

event that he/she fails to abide by the provisions of this Order, he/she may be subject to sanctionsby the administrative and judicial courts of this Commonwealth.

|  |  |  |
| --- | --- | --- |
| Date |  | Signature  Print Name    **\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**  Job Title and Job Description  Business Address  Employer  If Independent Expert, List Persons/Entities Retaining You  Role in Proceeding |

**P-2014-2411941 ET AL PETITION OF SUNOCO PIPELINE LP**

(2-26-15 per ALJ)

Christopher A Lewis Esquire**\***

Frank L Tamulonis Esquire**\***

Michael L Krancer Esquire**\***

melanie s carter esquire

Blank Rome LLP

One Logan Square

Philadelphia PA 19103

***Representing Sunoco Pipeline L.P.***

***\*Accepts E-Service***

KENNETH R MYERS ESQUIRE

DAVID J BROOMAN ESQUIRE

SIREEN I TUCKER ESQUIRE

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40 EAST AIRY STREET

NORRISTOWN PA 19404

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Margaret A Morris Esquire

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2929 Arch Street

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***Representing East & West Goshen Township***

***Accepts E-service***

scott j rubin esquire

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***Representing Concerned Citezens of West Goshen Township***

***Accepts E-Service***

Augusta Wilson ESQUIRE**\***

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***Representing Clean Air Council***

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***Representing Delaware River Keeper Network***

***Accepts E-Service***

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MEDIA PA 19063

***Representing Upper Chichester Township***

***Accepts E-Service***