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August 31, 2020

**VIA ELECTRONIC FILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, Filing Room  
Harrisburg, PA 17120

Re: Application of Aqua Pennsylvania Wastewater, Inc. pursuant to Sections 1102, 1329 and 507 of the Public Utility Code for approval of the acquisition by Aqua of the wastewater system assets of the Delaware County Regional Water Quality Control Authority; Docket No. A-2019-3015173; **SUNOCO PARTNERS MARKETING & TERMINALS, L.P./ENERGY TRANSFER PREHEARING CONFERENCE MEMORANDUM**

Dear Secretary Chiavetta:

Attached for filing with the Commission is Sunoco Partners Marketing & Terminals, L.P./Energy Transfer's Prehearing Conference Memorandum in the above-referenced proceedings.

If you have any questions regarding this filing, please contact the undersigned.

Very truly yours,

*/s/ Thomas J. Sniscak*

Thomas J. Sniscak  
Kevin J. McKeon  
Whitney E. Snyder  
Melissa A. Chapaska

*Counsel for Sunoco Partners Marketing  
& Terminals, L.P./Energy Transfer*

WES/das  
Enclosure

cc: Honorable Angela T. Jones (Email [angeljones@pa.gov](mailto:angeljones@pa.gov))  
Honorable Charles E. Rainey, Jr. (Email [crainey@pa.gov](mailto:crainey@pa.gov))  
Per Certificate of Service

BEFORE THE  
PENNSYLVANIA PUBLIC UTILIT COMMISSION

Application of Aqua Pennsylvania :  
Wastewater, Inc. pursuant to Sections 1102, :  
1329 and 507 of the Public Utility Code for : Docket No. A-2019-3015173  
approval of the acquisition by Aqua of the :  
wastewater system assets of the Delaware :  
County Regional Water Quality Control :  
Authority :

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**PREHEARING CONFERENCE MEMORANDUM  
OF SUNOCO PARTNERS MARKETING & TERMINALS, L.P.**

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**TO THE HONORABLE ANGELA T. JONES:**

Pursuant to 52 Pa. Code § 5.222(d) and Your Honor's August 17, 2020 Further Corrected Prehearing Conference Order, Sunoco Partners Marketing & Terminals, L.P./Energy Transfer (SPMT) submits this prehearing conference memorandum.

**A. SERVICE**

SPMT requests that **each** of the below attorneys be included on electronic service of documents in this proceeding.

Thomas J. Sniscak, Attorney I.D. # 33891  
Kevin J. McKeon, Attorney I.D. # 30428  
Whitney E. Snyder, Attorney I.D. # 316625  
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SPMT requests that the official service list in this proceeding be updated to include each of these attorneys.

**B. SETTLEMENT**

SPMT is willing to engage in settlement discussions.

**C. DISCOVERY**

SPMT does not propose any additional modifications to discovery procedures than what is contained in the August 17, 2020 Prehearing Order.

**D. OTHER PROPOSED ORDERS OF DISCOVERY**

SPMT does not propose any further modifications to the Commission's discovery regulations.

**E. PROPOSED SCHEDULE FOR TESTIMONY, HEARING, AND BRIEFS**

SPMT is willing to cooperate with the other parties to this proceeding. Given the 60-day extension to the statutory suspension period granted on August 31, 2020,<sup>1</sup> SPMT believes the schedule set forth in the August 17, 2020 Prehearing Order should be extended.

**F. WITNESSES.**

At this time SPMT identifies the following witness:

Howard J. Woods, Jr., P.E.  
Howard J. Woods, Jr & Associates, L.L.C.  
49 Overhill Road  
East Brunswick, NJ 08816-4211  
[howard@howardwoods.com](mailto:howard@howardwoods.com)

SPMT reserves its right to identify additional witnesses.

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<sup>1</sup> Order Granting The Office Of Consumer Advocate's Expedited Motion For An Extension Of The Statutory Suspension Period For Aqua Pennsylvania Wastewater Company's Application To Acquire Delaware County Regional Water Quality Control Authority's Wastewater System Assets (Chief Administrative Law Judge Rainey) (Order entered Aug. 31, 2020).

**G. ISSUES**

SPMT identified various issues in its Protest and reserves its right to pursue additional issues in this proceeding as they arise.

**H. EVIDENCE**

SPMT intends to present the pre-filed testimony of the above-named witness along with any exhibits that witness may sponsor to support his testimony. SMPT reserves the right to adopt the testimony of other witnesses, in whole or in part, to substitute witnesses, and to offer additional witnesses and exhibits, including but not limited to addressing the testimony, exhibits or other evidence that other parties in this proceeding may present.

Respectfully submitted,

/s/ Thomas J. Sniscak

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Dated: August 31, 2020

*Attorneys for  
Sunoco Partners Marketing  
& Terminals, L.P./Energy Transfer*

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the forgoing document upon the persons listed below in accordance with the requirements of § 1.54 (relating to service by a party). This document has been filed electronically on the Commission's electronic filing system and served on the following:

### **VIA ELECTRONIC MAIL ONLY**

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/s/ Thomas J. Sniscak

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Dated: August 31, 2020