

June 9, 2014

Via Electronic Filing

Rosemary Chiavetta, Esquire
Secretary
PA Public Utility Commission
Commonwealth Keystone Building, 2 North
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Docket No.: P-2014-2411966
Amended Petition of Sunoco Pipeline LP
East Goshen Township - Petition to Intervene**

Dear Secretary Chiavetta:

Attached for filing is the Petition to Intervene of East Goshen Township (East Goshen) in the above captioned proceedings.

As indicated on the attached Certificate of Service, a copy of East Goshen's Petition to Intervene has been provided to the service list in the manner indicated.

If there are any questions, please do not hesitate to contact me.

Very truly yours,

Reger Rizzo & Darnall LLP



Margaret A. Morris

MAM/jmm
Enclosure

cc: Louis F. Smith, Manager, East Goshen Township [w/enc.]
Kristin S. Camp, Esquire, Buckley Brion McGuire & Morris LLP [w/enc.]

**Re: Docket No.: P-2014-2411966
Amended Petition of Sunoco Pipeline LP
East Goshen Township - Petition to Intervene**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served upon the following persons on the attached service list, in the manner indicated, in accordance with the requirements of §1.54 (relating to service by a participant).

Dated: June 9, 2014


Margaret A. Morris, Esq.

**Re: Docket No. P-2014-2411966
Amended Petition of Sunoco Pipeline LP
East Goshen Township - Petition to Intervene**

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Amended Petition of Sunoco Pipeline LP for a	:	
Finding For a Finding that the Situation of	:	West Goshen Township, Chester County
Structures To Shelter Pump Stations and	:	(Docket No. P-2014-2411966)
Valve Control Is Reasonably	:	
Necessary for the Convenience Or Welfare	:	
of the Public	:	

**PETITION TO INTERVENE OF
THE BOARD OF SUPERVISORS OF EAST GOSHEN TOWNSHIP
TO THE AMENDED PETITION OF SUNOCO PIPELINE, L.P.**

The Board of Supervisors of East Goshen Township (EGT), by and through its undersigned attorneys, pursuant to 52 Pa. Code §§ 5.71-76 and in accordance with the Notice published in the *Pennsylvania Bulletin* at 44 Pa.B. 3214 (May 24, 2014), hereby files this Petition to Intervene in the above-captioned consolidated proceedings.

I. Introduction

On March 21, 2014, Sunoco Pipeline LP (Sunoco) filed a Petition in the previously consolidated proceedings, including in relevant part, Docket No. P-2014-2411966, requesting a finding that: 1) Petitioner is a public utility corporation; and 2) the situation of Sunoco's buildings to shelter pump stations and valve control stations in 31 Pennsylvania municipalities is reasonably necessary for the convenience and welfare of the public and therefore, that the buildings are exempt from any local zoning, subdivision and land development regulations (Petition).

On May 8, 2014, Sunoco filed an Amended Petition requesting, *inter alia*, a finding that a structure to shelter a pump station in West Goshen Township, Chester County is reasonably necessary for the convenience and welfare of the public and exempt from local zoning, subdivision and land development pursuant to Section 619 of the Pennsylvania Municipalities Planning Code, 53 P.S. § 10619 (Amended Petition).

Sunoco proposes as part of its pipeline project, Mariner East,¹ to construct a pump station at 1261 Boot Road, West Goshen Township (Boot Road Station)² to inject energy into the flow of ethane and propane moving through the pipeline. *See*, Exhibit C of Amended Petition. Sunoco avers that it will construct a structure to house the equipment associated with the Boot Road Pump Station.

II. EGT's Interest and Standing to Intervene

In support of this Petition to Intervene, EGT provides the following additional information:

1. The instant intervenor is the Board of Supervisors of East Goshen Township, Chester County, Pennsylvania. The Amended Petition has identified West Goshen Township as a location for the construction of one of the proposed pump stations to serve Mariner East; said location shares a contiguous border with East Goshen Township.

2. The intervenor's attorney in this proceeding is:

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3. Counsel for intervenor is authorized to accept service on behalf of EGT in this proceeding. EGT requests that the Commission and all parties of record serve copies of all documents (including but not limited to correspondence, discovery requests and answers, commission orders, pleadings and testimony) electronically on its counsel of record as well as by hard copy.

¹Mariner East project is an approximately 300-mile project that will make use of Sunoco's existing pipeline infrastructure, supplemented by construction of an additional 51-mile extension from Houston, Pennsylvania to Delmont Pennsylvania, to ship natural energy from the Marcellus Shale in Pennsylvania to the Marcus Hook refinery complex in Claymont Delaware.

²The property is a 4.42-acre parcel of property located entirely in West Goshen Township, Chester County, Pennsylvania; Tax Parcel 52-1-10.1, which is currently zoned as R-3 Residential.

4. Sunoco is seeking to locate and to operate a public utility facility in West Goshen Township in an area currently zoned R-3 Residential. The interest of EGT and its citizenry will be directly affected by Sunoco's proposed construction at the Boot Road Station and no other participant can adequately represent those interests. Due to the early stage of the proceeding, EGT reserves the right to formalize its position after it has had the opportunity to evaluate Sunoco's further filings, conduct discovery and review any additional information that may be provided, and to raise and/or address additional issues that may be identified by other parties.

5. As a result of Sunoco's proposal to locate its facilities on property contiguous to East Goshen Township, EGT satisfies the standard for intervention pursuant to 52 Pa. Code § 5.72(b).

III. Conclusion

WHEREFORE, the Board of Supervisors of East Goshen Township respectfully requests that the Commission and the presiding Administrative Law Judges grant its Petition to Intervene and issue full-party status in the consolidated proceedings.

Respectfully submitted,



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Dated: June 9, 2014

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