

January 31, 2017

VIA ELECTRONIC FILING

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

**RE: Application of Laurel Pipe Line Company, L.P. for All Necessary Authority, Approvals,
and Certificates of Public Convenience To Change the Direction of Petroleum Products
Transportation Service to Delivery Points West of Eldorado, Pennsylvania
Docket No. A-2016-2575829**

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission is the Petition to Intervene of Sunoco, LLC ("Sunoco"), in the above-referenced proceeding.

As shown by the attached Certificate of Service, all parties to this proceeding are being duly served.

Thank you.

Respectfully submitted,



**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Laurel Pipe Line Company, L.P. for All Necessary Authority, Approvals, and Certificates of Public Convenience to Change the Direction of Petroleum Products Transportation Service to Delivery Points West of Eldorado, Pennsylvania	Docket No. A-2016-2575829
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PETITION TO INTERVENE OF SUNOCO, LLC

Pursuant to Section 5.71 and 5.74 of the Pennsylvania Public Utility Commission's ("PUC" or "Commission") regulations, 52 Pa. Code §§ 5.71 and 5.74, Sunoco, LLC ("Sunoco") hereby files this Petition to Intervene in the above-captioned proceeding. In support therefore, Sunoco asserts the following:

1. Sunoco, LLC is a Delaware limited liability company with offices located at 3801 West Chester Pike, Newtown Square, PA 19073. The name and address of Sunoco's attorney is:

Andrew S. Levine (Pa. I.D. No. 43645)
Stradley, Ronon, Stevens & Young, LP
2600 One Commerce Square
Philadelphia, PA 19103
Phone: (215) 564-8073
Fax: (215) 564-8120

2. On November 14, 2016, Laurel Pipe Line Company, L.P. ("Laurel" or "Applicant") filed its Application for All Necessary Authority, Approvals, and Certificates of Public Convenience to Change the Direction of Petroleum Products Transportation Service to Delivery Points West of Eldorado, Pennsylvania, with the Commission pursuant to various provisions of the Pennsylvania Public Utility Code ("Application"). See Pa. C.S. §§ 101, et seq.

3. On November 16, 2016 the Commission issued a Secretarial Letter directing Laurel to publish notice of the Application in a newspaper having general circulation in the area involved and file proof of publication with the Commission by December 19, 2016. The Secretarial Letter also confirmed that the Commission would publish notice of the Application in the Pennsylvania Bulletin on December 3, 2016, with formal protests and petitions to intervene due to the Commission by December 19, 2016.

4. On November 22, 2016, Gulf Operating, LLC ("Gulf Operating") filed its Petition to Intervene and Motion to Extend the Deadline for Protests. In December 6, 2016, the Commission granted Gulf Operating's motions and rescheduled the deadline for submitting interventions and protests for February 1, 2017. On December 6, 2016, the Commission also issued a Secretarial Letter reflecting its decision on Gulf Operating's motions.

5. As set forth in the Application, Laurel currently transports petroleum products from points of origin near Philadelphia, Pennsylvania, to destination points across the Commonwealth, terminating west of Pittsburgh, Pennsylvania. See Application at 2. In addition to the intrastate shipments, Laurel assigns a portion of its capacity to Buckeye Pipe Line Company, L.P. ("Buckeye") for interstate transportation service from origin points in New Jersey and Delaware to destination points in Pennsylvania. *Id.* As stated in the Application, Laurel and Buckeye are general partners of Buckeye Partners, L.P., and Buckeye Partners, L.P. is indirectly controlled by its general partner, Buckeye GP LLC. *Id.* at 4.

6. The Application proposes to dramatically modify the jurisdictional pipeline transportation service currently provided by Laurel by eliminating service to all points west of Eldorado (near Altoona) from the east, which includes the Pittsburgh metropolitan area. *Id.* at 9.

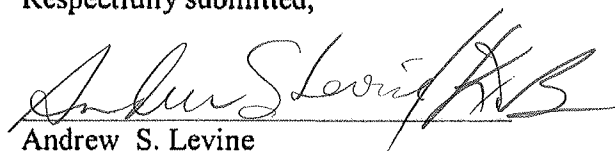
Laurel proposes to continue using the pipeline facilities west of Eldorado, and for future receipt of interstate deliveries originating from origin points in the Midwest and the Pittsburgh area. Id.

7. Sunoco is a retail and wholesale supplier of gasoline and distillate products to the public, and operates such retail facilities, and conducts wholesale business throughout the Commonwealth of Pennsylvania. Sunoco must comply with the requirements of the Pennsylvania Department of Environmental Protection, specifically 25 Pa. Code §§126.301-126.303, which require that Sunoco provide gasoline at a Reid Vapor Pressure (“RVP”) of 7.8 pounds per square inch from May 1 through September 15 in the Pittsburgh – Beaver Valley area. Gasoline with the aforesaid RVP, known as “Low RVP,” volatilizes at a higher temperature than winter-blended gasoline at a higher RVP. Sunoco and other market participants can currently receive Low RVP gasoline from pipelines both to the west and east of Pittsburgh, relying principally upon the Laurel Pipeline for supplies from the east. Laurel’s pending proposal would eliminate the Pittsburgh source of supply from the east, thus potentially causing shortages of gasoline for consumers in the Pittsburgh market in the summer. Fuel flowing from the east will terminate at Altoona/Eldorado, PA, approximately 125 miles east of Pittsburgh. Currently, the quality of gasoline delivered into Altoona/Eldorado, Pa in the summer month does not meet the “Low RVP” Pittsburgh specification. This eliminates any potential to truck additional supply into the Pittsburgh market from Altoona/Eldorado if supply from the west is tight or restricted.

8. Therefore, consistent with 52 Pa. Code §5.72(1), Sunoco has a significant interest in this proceeding that is not represented by any other party of record. Therefore, Sunoco qualifies for and should be granted intervenor status in this proceeding.

WHEREFORE, Sunoco, LLC respectfully requests that the Pennsylvania Public Utility Commission grant the Petition to Intervene and provide Sunoco, LLC with full- party status in this proceeding.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Andrew S. Levine" with a stylized flourish at the end.

Andrew S. Levine
Stradley, Ronon, Stevens & Young, LP
2600 One Commerce Square
Philadelphia, PA 19103
Phone: (215) 564-8073
Fax: (215) 564-8120
Counsel for Sunoco, LLC

Dated: January 31, 2017

VERIFICATION

I, Karl Fails, President of Sunoco, LLC, hereby state that the facts set forth in the foregoing document 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).

Signed:  _____

January 31, 2017

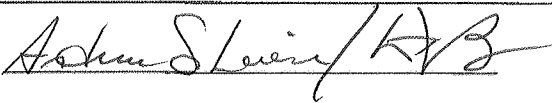
CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of Section 1.54 (relating to service by a participant).

VIA E-MAIL AND FIRST CLASS MAIL

<p>Lillian S. Harris, Esq. Garrett P. Lent, Esq. Post & Schell, P.C. 17 North Second Street, 1ih Floor Harrisburg, PA 17101-1601 lhans@postschell.com glent@postschell.com</p>	<p>Adam D. Young, Esq. Michael L. Swindler, Esq. Bureau of Investigation and Enforcement Pennsylvania Public Utility Commission The Commonwealth Keystone Building P.O. Box 3265 Harrisburg, PA 17105-3265 adyoung@pa.gov mwindler@pa.gov</p>
<p>David B. MacGregor, Esq. Post & Schell, P.C. Four Penn Center 1600 John F. Kennedy Boulevard Philadelphia, PA 19103-2808 dmacgregor@postschell.com</p>	<p>Robert A. Weishaar, Jr., Esq. McNees Wallace & Nurick LLC 777 North Capitol Street, NW Suite 401 Washington, DC 20002 rweishaar@mcneeslaw.com</p>
<p>Tanya J. McCloskey, Esq. Office of Consumer Advocate 555 Walnut Street, 5111 Floor Harrisburg, PA 17101-1923 tmccloskey@paoca.org</p>	<p>John R. Evans, Esq. Office of Small Business Advocate Suite 202, Commerce Building 300 North Second Street Harrisburg, PA 17101 jorevan@pa.gov</p>
<p>Susan E. Bruce, Esq. Adeolu A. Bakare, Esq. Kenneth R. Stark, Esq. McNees Wallace & Nurick LLC 100 Pine Street P.O. Box 1166 Harrisburg, PA 17108-1166 sbruce@mcneeslaw.com abakare@mcneeslaw.com kstark@mcneeslaw.com</p>	<p>Christopher A. Ruggiero, Esq. Monroe Energy, LLC 4101 Post Road Trainer, PA 19061 (First class only)</p>

Alan M. Seltzer, Esq. John G. Povilaitis, Esq. Buchanan, Ingersoll, Rooney, PC 409 N. Second Street, Suite 500 Harrisburg, PA 17101-1357 alan.seltzer@bipc.com john.povilaitis@bipc.com	
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Signed: 

Dated this 31st day of January, 2017 in Philadelphia, Pennsylvania.