



July 24, 2018

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

RE: *Andover Homeowners' Association, Inc. v. Sunoco Pipeline L.P.*
Dinniman v. Sunoco Pipeline, L.P., Dockets C-2018-3001451 and P-2018-3001453
Motion to Consolidate

Dear Secretary Chiavetta,

Please find the attached Motion to Consolidate the two above-referenced dockets filed today by Andover Homeowners' Association, Inc. concerning Sunoco Pipeline, L.P. Copies have been served in accordance with the attached Certificate of Service.

Please contact me with any questions. Thank you.

Sincerely,

/s/

Rich Raiders, Esq.

Enclosure

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Andover Homeowners' Association, Inc.,	:	Docket No. C-2018-_____
Petitioner	:	
	:	
v.	:	
Sunoco Pipeline L.P.,	:	
Respondent	:	
	:	
In re: Amended Formal Complaint and	:	
Amended Petition for Interim Emergency	:	Docket No. C-2018-3001451
Relief of Pennsylvania State Senator	:	and P-2018-3001453
Andrew Dinniman,	:	
Petitioner	:	
	:	
v.	:	
	:	
Sunoco Pipeline L.P., a/k/a Energy	:	
Transfer Partners,	:	
Respondent	:	

NOTICE TO PLEAD

Pursuant to 52 Pa. Code § 5.103(c), you are hereby notified to file a written response to the enclosed Motion within twenty (20) days from service hereof or the Preliminary Objections may be granted. All pleadings must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy served on counsel, and, where applicable, the Administrative Law Judge presiding over the issue.

File with:

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

With a copy to:

Rich Raiders, Esq.

606 North 5th Street
Reading, PA 19601

Dated: June 12, 2018

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Andover Homeowners' Association, Inc.,	:	Docket No. C-2018-_____
Petitioner	:	
	:	
v.	:	
Sunoco Pipeline L.P.,	:	
Respondent	:	
	:	
In re: Amended Formal Complaint and	:	
Amended Petition for Interim Emergency	:	Docket No. C-2018-3001451
Relief of Pennsylvania State Senator	:	and P-2018-3001453
Andrew Dinniman,	:	
Petitioner	:	
	:	
v.	:	
	:	
Sunoco Pipeline L.P., a/k/a Energy	:	
Transfer Partners,	:	
Respondent	:	

MOTION FOR CONSOLIDATION

AND NOW, comes Andover Homeowners' Association, Inc. ("Association"), by and through its below-signed counsel, petitioning the Pennsylvania Public Utility Commission ("Commission") to consolidate two actions captioned above, and avers in support thereof as follows:

1. Senator Andrew Dinniman ("Dinniman") filed an Amended Complaint in dockets C-2018-3001451 and P-2018-3001453 ("Dinniman Docket") on April 25, 2018.
2. The Association intervened in the Dinniman Docket, where the Commission granted the Association's intervention on July 20, 2018.
3. The Association filed a Formal Complaint on July 24, 2018, concerning substantially similar subject matter, but, in addition, requesting the Commission review, *inter alia*, the issue of Sunoco Pipeline L.P. ("Sunoco") petitioning to utilize a 12" line known as the

“Point Breeze to Montello” line (“12 inch line”), a legacy pipeline from the 1930s that Sunoco proposes to utilize for highly volatile natural gas liquids (“NGL”) service in Delaware and Chester Counties, Pennsylvania.

4. Both Formal Complaints involve the Sunoco Mariner East pipelines, including the 1930s Mariner East 1 (“ME1”) pipeline, the proposed Mariner East 2 and 2X pipelines (collectively “ME2”), and now the 12 inch line.
5. These matters relate to similar and overlapping issues concerning various aspects of Sunoco’s Mariner East project.
6. The Association believes that Sunoco would offer similar or identical defenses to the Association’s Formal Complaint as it would to the Senator’s Complaint.
7. A party may request relief not explicitly prohibited under 52 Pa. Code § 5.103.
8. The Association is not aware of any reason consolidation of these dockets would be prohibited.
9. The Commission previously consolidated dockets C-2018-3001451 and P-2018-3001453.

WHEREFORE, Andover Homeowners’ Association, Inc. respectfully requests the Commission consolidate Dockets C-2018-3001451 and P-2018-3001453 with the docket created concerning the Association’s Formal Complaint.

Respectfully Submitted,



Rich Raiders, Esq.
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Dated: July 24, 2018

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Andover Homeowners' Association, Inc.,	:	Docket No. C-2018-_____
Petitioner	:	
	:	
v.	:	
Sunoco Pipeline L.P.,	:	
Respondent	:	
	:	
In re: Amended Formal Complaint and	:	
Amended Petition for Interim Emergency	:	Docket No. C-2018-3001451
Relief of Pennsylvania State Senator	:	and P-2018-3001453
Andrew Dinniman,	:	
Petitioner	:	
	:	
v.	:	
	:	
Sunoco Pipeline L.P., a/k/a Energy	:	
Transfer Partners,	:	
Respondent	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing Motion for Consolidation in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant). This document has been filed electronically on the Commission's electronic filing system.

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Dated: July 24, 2018

Respectfully Submitted,



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