

Whitney Snyder

From: Thomas Sniscak
Sent: Wednesday, November 21, 2018 10:17 AM
To: Chiavetta, Rosemary
Cc: mbomstein@gmail.com
Subject: Flynn et al v. Sunoco Pipeline L.P. Complaint and Petition for Interim Emergency Relief

Via email and e-file

Dear Secretary Chiavetta:

I am writing to you by email as co-counsel on behalf of Sunoco Pipeline L.P. (SPLP) in the above-referenced matter given the time constraints in this matter and the fact that the PUC will be closing at 2:30 pm today and not re-opening until this coming Monday. It has come to SPLP's attention that the above-captioned complaint and accompanying Petition for Interim Emergency Relief have been docketed and the complaint potentially may be served upon SPLP today. Under the PUC's rules, the Petition for Interim Emergency Relief has an answer period of 5 days. While the Complainants have had weeks, if not months, to prepare their Petition, 4 of the next 5 days include two state holiday days (Thanksgiving and Friday) and two weekend days. Complainants' decision to submit the Petition either yesterday or today, if intended to include these four days and to make the Answer being due Monday, is unreasonable in this situation for SPLP to Answer the 20 page Petition and its attachments, and to investigate and respond to the many factual contentions and claims made given that SPLP's fact persons are largely unavailable during this extended major holiday weekend. The same is true for references to persons or facts in the Petition external to SPLP.

Given this backdrop, and whether intentionally submitted or filed or not to attempt to span or include these 4 non-working days in the 5 days, SPLP respectfully requests that in this instance the 5 days be interpreted as working days resulting in the Answer being filed by no later than Friday November 30, 2018.

Thank you for your consideration and we are cc-ing counsel for the Flynn *et al* complainants, Mr. Bomstein. If you have any questions you may reach me at 717 919 4022 or by email.

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