



COUNTY OF DELAWARE
GOVERNMENT CENTER BUILDING
201 WEST FRONT STREET
Media, PA 19063

OFFICE OF THE SOLICITOR
TELEPHONE: 610-891-4072
FAX NUMBER: 610-891-4816

PATRICIA SONS BISWANGER
Office of the Solicitor of Delaware County
217 North Monroe Street
Media, PA 19063
DIRECT LINE: 610-608-0687 phone / 866-731-9601 fax
patbiswanger@gmail.com

May 26, 2019

Via Electronic Filing
Rosemary Chiavetti, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

re: **In re Meghan Flynn, et al v. Sunoco Pipeline, L.P.**
Docket Numbers C-2018-3006116 and P-2018-3006117

Dear Secretary Chiavetti:

In connection with the above-captioned action, enclosed for electronic filing with the Commission please find **Delaware County's Reply to Sunoco Pipeline L.P.'S Motion to Strike as Untimely Certain Intervenors' Answer to Its Motion For an Amended Protective Order.**

All parties of record have been served pursuant to the attached Certificate of Service.

If you have any questions or concerns, please do not hesitate to contact this office.

Thank you very much for your very kind assistance.

Sincerely,

COUNTY OF DELAWARE
Pat Biswanger /e/
Patricia Sons Biswanger
Assistant Solicitor

Enclosures

cc: as per Certificate of Service (w/enclosures)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

_____	:	
Michael Flynn, Rosemary Fuller,	:	
Michael Walsh, Nancy Harkins,	:	
Gerald McMullen, Caroline Hughes,	:	Docket No. P-2018-3006117
and Melissa Haines,	:	Docket No. C-2018-3006116
	:	
v.	:	
	:	
Sunoco Pipeline, L.P.,	:	
_____	:	

**DELAWARE COUNTY’S REPLY TO
SUNOCO PIPELINE L.P.’S MOTION TO STRIKE
AS UNTIMELY CERTAIN INTERVENORS’ ANSWER TO
ITS MOTION FOR AN AMENDED PROTECTIVE ORDER**

On April 17, 2019, Sunoco Pipeline L.P. (“SPLP”) filed a motion for an Amended Protective Order. On May 14, 2019, certain of the Intervenor in this matter, including Delaware County, filed an opposition to that motion. By motion dated May 17, 2019, SPLP complains that the opposition should be stricken because it was untimely.

SPLP can point to no prejudice that will result from admission of the intervenors’ opposition, nor can they. The opposition consists a grand total of four pages. Of those four pages, fewer than two pages are devoted to argument; the rest are consumed by the caption, the introduction, and the signature block. It is hardly onerous reading.

For this reason, Delaware County respectfully requests that SPLP’s motion be denied, and the opposition be admitted to the proceedings before this Commission.

Respectfully submitted,
Patricia Biswanger /e/

Patricia Sons Biswanger
Office of the Solicitor / Delaware County
201 West Front Street
Media, PA 19063
610-608-0687 telephone / 866-731-9601 fax
patbiswanger@gmail.com

for Delaware County

dated: May 26, 2019

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Michael Flynn, Rosemary Fuller,
Michael Walsh, Nancy Harkins,
Gerald McMullen, Caroline Hughes,
and Melissa Haines,

Docket No. P-2018-3006117
Docket No. C-2018-3006116

v.

Sunoco Pipeline, L.P.,

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of May, 2019, I have served a true copy of the foregoing **Delaware County's Reply to Sunoco Pipeline L.P.'S Motion to Strike as Untimely Certain Intervenor's Answer to Its Motion For an Amended Protective Order** upon the parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54, via electronic mail upon the persons listed below:

<p>Thomas J. Sniscak, Esquire Kevin J. McKeon, Esquire Whitney E. Snyder, Esquire Hawke, McKeon & Sniscak LLP 100 North Tenth Street Harrisburg, PA 17101 tjsniscak@hmslegal.com kjmckeon@hmslegal.com wesnyder@hmslegal.com <i>Attorneys for Respondent SPLP</i></p>	<p>Robert Fox, Esquire Neil Witkes, Esquire Diana A. Silva, Esquire Manko, Gold, Katcher & Fox, LLP 401 City Avenue, Suite 901 Bala Cynwyd, PA 19004 rfox@mankogold.com nwitkes@mankogold.com dsilva@mankogold.com <i>Attorneys for Respondent SPLP</i></p>	<p>Guy Donatelli, Esquire Vincent M. Pompo, Esquire Alex J. Baumler, Esquire Lamb McErlane PC 24 East Market Street West Chester, PA 19382-0565 gdonatelli@lambmcerlane.com vpompo@lambmcerlane.com abaumler@lambmcerlane.com <i>Attorneys for West Whiteland, Downingtown Sch Dist, Rose Tree Media Sch Dist, Sen Killion</i></p>	<p>Mark L. Freed, Esquire Joanna A. Waldron, Esquire Curtin & Heefner, LLP 2005 S Easton Road, Ste 100 Doylestown, PA 18901 mlf@curtinheefner.com jaw@curtinheefner.com <i>Attorney for Uwchlan Twp</i></p>
<p>Michael P. Pierce, Esquire Pierce & Hughes 17 Veterans Square Media, PA 19063 mpierce@pierceandhughes.com <i>Attorney for Edgmont Twp</i></p>	<p>Michael S. Bomstein, Esquire Pinnola & Bomstein Suite 2126 Land Title Building 100 South Broad Street Philadelphia, PA 19110 mbomstein@gmail.com <i>Attorney for Complainants</i></p>	<p>Anthony D. Kanagy, Esquire Garrett P. Lent, Esquire Post & Schell PC 17 North Second Street 12th Floor Harrisburg, PA 17101-1601 a akanagy@postschell.com glent@postschell.com <i>Attorney for Range Resources</i></p>	<p>Melissa DiBernardino 1602 Old Orchard Lane West Chester, PA 19380 lissdibernardino@gmail.com <i>pro se</i></p>
<p>James C. Dalton, Esquire Unruh, Turner, Burke & Frees P.O. Box 515 West Chester, PA 19381-0516 jdalton@utbf.com <i>Attorney for West Chester Area S.D.</i></p>	<p>Rich Raiders, Esquire Raiders Law 321 East Main Street Annville, PA 17003 rich@raiderslaw.com <i>Attorney for Andover Homeowners</i></p>	<p>James R. Flandreau, Esquire Paul, Flandreau & Berger, LLP 320 West Front Street Media, PA 19063 jflandreau@pfbllaw.com <i>Attorney for Middletown Sch Dist</i></p>	<p>Virginia Marcielle-Kerslake 103 Shoen Road Exton, PA 19341 vkerslake@gmail.com <i>pro se</i></p>
<p>Margaret A. Morris, Esquire Reger Rizzo Darnall, LLP Cira Centre, 13th Floor 2929 Arch Street Philadelphia, PA 19104 mmorris@regerlaw.com <i>Attorney for Chesco, E Goshen Twp</i></p>	<p>Michael L. Swindler, Esquire Stephanie M. Wimer, Esquire PUC – Bureau of I & E P.O. Box 3265 Harrisburg, PA 17105-3265 mswindler@pa.gov stwimer@pa.gov <i>Attorneys for Bureau of I & E</i></p>	<p>Leah Rotenberg, Esquire Mays Connrad & Rotenberg, LLP 1235 Penn Avenue, Suite 202 Wyomissing, PA 19610 rotenberg@mcr-attorneys.com <i>Attorney for Twin Valley Sch Dist</i></p>	<p>Laura Obenski 14 South Village Avenue Exton, PA 19341 ljobenski@gmail.com <i>pro se</i></p>
			<p>Josh Maxwell 4 West Lancaster Avenue Downingtown, PA 19335 jmaxwell@downingtwn.org <i>pro se</i></p>
			<p>Rebecca Britton 211 Andover Drive Exton, PA 19341 rbrittonlegal@gmail.com <i>pro se</i></p>

Patricia Biswanger /e/

Patricia Sons Biswanger
Office of the Solicitor, The County of Delaware
217 North Monroe Street, Media, PA 19063
610-608-0687 telephone / 866-731-9601 fax / patbiswanger@gmail.com