



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET, HARRISBURG, PA 17120

IN REPLY PLEASE
REFER TO OUR FILE

July 1, 2019

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Pennsylvania Public Utility Commission, Bureau of Investigation and
Enforcement v. Sunoco Pipeline, L.P. a/k/a Energy Transfer Partners
Docket No. C-2018-3006534
**I&E Answer in Opposition to Upper Uwchlan Township's
Late-Filed Petition to Intervene**

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Bureau of Investigation and
Enforcement's Answer in Opposition to Upper Uwchlan Township's Late-Filed Petition to
Intervene in the above-referenced matter. Copies have been served on the parties of record
in accordance with the Certificate of Service.

Sincerely,

A handwritten signature in black ink, appearing to read "S. M. Wimer", is written over a horizontal line.

Stephanie M. Wimer
Senior Prosecutor
PA Attorney ID No. 207522

Michael L. Swindler
Deputy Chief Prosecutor
PA Attorney ID No. 43319

Enclosure

cc: Honorable Elizabeth H. Barnes
Michael S. Bomstein, Esquire (counsel for Flynn Complainants)
Thomas Casey (*pro se* Petitioner)
Josh Maxwell (*pro se* Petitioner)
Vincent M. Pompo, Esquire (counsel for West Whiteland Township)
Alex J. Baumler, Esquire (counsel for West Whiteland Township)
Michael P. Pierce, Esquire (counsel for Edgmont Township)
As per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,
Bureau of Investigation and Enforcement,
Complainant,

v.

Sunoco Pipeline, L.P. a/k/a
Energy Transfer Partners,
Respondent

Docket No. C-2018-3006534

**ANSWER OF THE BUREAU OF INVESTIGATION AND ENFORCEMENT
IN OPPOSITION TO THE LATE-FILED PETITION TO INTERVENE OF
UPPER UWCHLAN TOWNSHIP**

TO THE HONORABLE ELIZABETH H. BARNES:

The Bureau of Investigation and Enforcement (“I&E”) of the Pennsylvania Public Utility Commission (“Commission”), by and through its prosecuting attorneys, pursuant to 52 Pa. Code § 5.66, files this Answer opposing Upper Uwchlan Township’s (“the Township”) Petition to Intervene in this proceeding as it was untimely filed by several months without good cause. Even if the Township is deemed to have good cause for its untimely filing, a denial of the Petition is warranted as the Township has not demonstrated that it maintains a unique interest that is not already sufficiently represented by I&E.

This proceeding was initiated over six (6) months ago by the filing of I&E’s Complaint against Sunoco Pipeline, L.P. a/k/a Energy Transfer Partners (“SPLP” or “Company”) on December 13, 2018. However, the Township took no steps to participate in this proceeding until the Commission recently remanded the matter to the Office of Administrative Law Judge (“OALJ”) for consideration of petitions to intervene that had already been filed by certain persons and entities. *Pa. Pub. Util. Comm’n, Bureau of Investigation and Enforcement v. Sunoco Pipeline, L.P. a/k/a Energy Transfer Partners,*

Docket No. C-2018-3006534 (Order entered June 10, 2019) at Ordering Paragraph No. 2.

Now, at this advanced stage of the proceeding and long after the challenge of reaching a mutually acceptable settlement has been completed, the Township seeks to intervene for the primary purpose of disrupting this Commission proceeding in order to deluge the parties with unrelated discovery for the purpose of acquiring information from SPLP for its own purposes to enrich its data banks for future use. Township Petition at ¶¶ 19 and 20.

As explained in greater detail below, the Township's request is untimely and should be denied because it would delay the orderly progress of this case and would waste time by interjecting issues that are completely outside the scope of this proceeding. Furthermore, the Township has not demonstrated that the granting of its Petition would protect an interest that is not already sufficiently represented by I&E making its duplicative participation nothing but a burden on the orderly course of this proceeding.

I. BACKGROUND

1. This proceeding was initiated by the filing of I&E's Complaint against Sunoco Pipeline, L.P. a/k/a Energy Transfer Partners ("SPLP" or "Company") on December 13, 2018, alleging violations of the United States Code, Code of Federal Regulations and Pennsylvania Code that I&E avers were discovered during an investigation of I&E's Safety Division of an ethane and propane leak that occurred on SPLP's Mariner East 1 ("ME1") pipeline on April 1, 2017, in Morgantown, Berks County, Pennsylvania. Notably, the Township is located in Chester County and approximately fifteen (15) miles away from the site of the leak. The leak did not result in a fire, explosion or cause any personal injury.

2. The I&E Safety Division determined that the leak was attributed to corrosion and this determination led the I&E Safety Division to examine SPLP's corrosion control

program, including its cathodic protection practices.¹ In short, I&E alleged that SPLP's corrosion control program was deficient as it relates to ME1 under practices and procedures that were in effect during the time of the April 1, 2017 leak in Morgantown. Those practices and procedures have since been revised and the revised procedures have been implemented.

3. After receiving an extension of time, SPLP filed a timely Answer and raised New Matter to I&E's Complaint on January 31, 2019. By Secretarial Letter dated February 22, 2019, I&E was granted an extension of time until March 4, 2019 to file a Reply to SPLP's New Matter. I&E and SPLP actively engaged in extensive settlement negotiations during the first quarter of 2019 and on March 1, 2019, the Parties announced by letter that they had achieved a settlement-in-principle on that same day and requested to hold the matter in abeyance pending the filing of a settlement agreement. On April 3, 2019, I&E and SPLP filed a Joint Petition for Approval of Settlement resolving all issues between I&E and SPLP in the instant matter.

4. During the pendency of the settlement negotiations that ultimately culminated in the Joint Petition for Approval of Settlement, several persons and entities sought to intervene in this matter: Thomas Casey on December 21, 2018, West Goshen Township on January 18, 2019, Josh Maxwell on February 8, 2019, West Whiteland Township on February 11, 2019, and Edgmont Township² on March 19, 2019. I&E and SPLP recognized these interests by expressly including language in the Joint Petition for Settlement which provided an opportunity for any interested entity or person to file comments to the Settlement

¹ Cathodic protection is a method of controlling corrosion on the surface of a metal pipeline by supplying electrical current.

² Edgmont Township's Petition to Intervene was filed after I&E and SPLP reached a settlement-in-principle.

Agreement followed by a reply comment period for I&E and SPLP. The Joint Petition for Approval of Settlement was submitted to the Commission directly for its review and consideration of the outstanding Petitions to Intervene.

5. By Commission Order entered June 10, 2019, the matter was referred to OALJ for, *inter alia*, further proceedings and the scheduling of hearings as may be deemed necessary on an expedited basis.

6. The agreed-upon terms that are set forth in the Settlement that was filed with the Commission and has now been referred to presiding Administrative Law Judge (“ALJ”) Elizabeth H. Barnes are unquestionably in the public interest as close scrutiny of the settlement terms and conditions reveals SPLP has agreed to undertake measures that surpass Federal pipeline safety requirements and perform those measures in an expedited time frame. Notably, SPLP agreed in this Settlement to retain an independent expert to conduct a Remaining Life Study of ME1. In a Statement that was released on February 8, 2019, Governor Wolf called upon the Commission to require “that a remaining life study of Mariner East 1 be completed and reviewed by independent experts. Such a study should thoroughly evaluate the safety of the existing pipeline and prepare a plan to implement the findings of that study as soon as possible.” A copy of Governor Wolf’s Statement is appended as I&E Exhibit 1. The instant Settlement favorably answers the Governor’s call.

7. Additionally, SPLP has agreed to perform in-line inspections (“ILI”) of ME1 at eighteen (18) month intervals for the next three (3) calendar years. Such inspections use tools to detect and record irregularities in pipelines, such as corrosion. Similarly, SPLP has agreed to perform Close Interval Surveys (“CIS”) of ME1 at the same intervals and frequency as the ILI runs to evaluate the effectiveness of SPLP’s corrosion control program.

8. Simply stated, if the instant matter results in a proceeding that is litigated, the carefully negotiated terms of the Settlement Agreement will be disturbed and a strict reading of the applicable regulations may render it difficult for the Commission to direct SPLP to perform the very relief that is agreed to in the Settlement.

9. Indeed, it is the Commission's policy to encourage settlements. 52 Pa. Code § 5.231(a). The Commission has stated that settlement results are often preferable to those achieved at the conclusion of a fully litigated proceeding. *Pa. Pub. Util. Comm'n, Bureau of Investigation and Enforcement v. Continental Communities, LLC and Hickory Hills, MHC, LLC*, Docket No. C-2015-2468131 (Initial Decision issued June 7, 2017 at 8; Final Order adopting Initial Decision entered August 11, 2016). *See also* 52 Pa. Code § 69.401 (providing that negotiated settlements or stipulations are often preferable to those achieved at the conclusion of a fully litigated rate proceeding). It is difficult for I&E to contemplate a better example than the instant Settlement to demonstrate an occasion where a settled outcome would result in more preferable terms than a litigated proceeding. Therefore, the Settlement Agreement should be expeditiously approved without modification.

II. ANSWER IN OPPOSITION TO THE LATE-FILED PETITION TO INTERVENE

10. The Township's Petition was untimely filed and should be denied. Section 5.74(b)(1) of the Commission's regulations provides that petitions to intervene should be filed as follows:

no later than the date fixed for the filing of responsive pleadings in an order or notice with respect to the proceedings but not less than the notice and protest period established under §§ 5.14 and 5.53 (relating to applications requiring notice; and time of filing) absent good cause shown.

52 Pa. Code § 5.74(b)(1). Section 5.53 of the Commission's regulations provides that "a protest shall be filed within the time specified in the published notice of the application. If no protest time is specified, the protest shall be filed within 60 days of publication of the notice."

11. I&E's Complaint was filed on December 13, 2018, and the Township's Petition was filed on June 14, 2019, 183 days after the filing of the pleading that initiated this matter. It is undeniable that the Township's Petition was not filed within the requisite sixty (60) day timeframe. Thus, it is necessary to examine whether the Township presented good cause for the late filing.

12. In the *Joint Application of Pennsylvania-American Water Company and Thames Water Aqua Holdings GmbH*, Docket Nos. A-212285F0096 and A-230073F0004 (Opinion and Order entered May 9, 2002), at 6, the Commission established four (4) standards to determine whether good cause has been established to accept a late-filed protest. Those standards are as follows: (a) Whether the petitioner has a reasonable excuse for missing the due date; (b) whether the proceeding was contested at the time of the filing of the protest; (c) whether the receipt of the late filed protest would delay the orderly progress of the case; and (d) whether the late filed protest significantly broadens the issues or shifts the burden of proof. The same criteria have been analyzed concerning late-filed interventions in I&E enforcement proceedings. See *Pa. Pub. Util. Comm'n, Bureau of Investigation and Enforcement v. West Penn Power Co.*, Docket No. C-2012-2307244 (Order entered August 29, 2013) (*West Penn Power Order*). Consideration of these criteria demonstrates, as set forth *infra.*, that granting the Township's request to intervene would be highly prejudicial to I&E and SPLP and contrary to the public interest.

a. The Township's Petition Failed to Offer Any Reasonable Excuse.

13. With respect to the first standard, the Township did not present a reasonable excuse or even any discussion for missing the intervention due date by approximately four (4) months. The Township failed to acknowledge the untimeliness of its Petition let alone explain any reason to attempt to demonstrate good cause for the untimeliness of its filing, which surpasses the already generous sixty (60) day deadline by more than three times. Notably, counsel for the Township represents another entity, West Goshen Township, who filed a timely Petition to Intervene in this matter. Thus, the Township was well aware of this proceeding at a much earlier stage and did not previously seek to intervene and participate in this matter. Granting the Township intervention would result in an unreasonable and inappropriate precedent that rewards petitioners who were well aware of the initiation of a complaint proceeding but wait until a settlement is reached to obtain party status. Furthermore, granting the Township intervention would open the floodgates and permit any person or entity who may be upset with SPLP's pipelines to intervene in this already settled matter. Such approach is completely inconsistent with the spirit and purpose of the rules permitting intervention and must be denied.

b. The Township's Petition is Rendered Moot by the Filed Settlement.

14. Regarding the second standard, as the result of the filing of the Settlement Agreement, this matter is no longer contested. Accordingly, the Township has failed to satisfy the second criteria justifying late-filed interventions.

c. The Township's Petition Unnecessarily Delays Implementation of the Settlement Terms.

15. With respect to the third standard, consideration of the late-filed intervention will certainly delay the orderly progress of this case. As explained in more detail above, I&E argues that the Joint Petition for Settlement should be approved without modification in an expeditious fashion so that the public may quickly realize the benefits of the significant measures achieved by the terms of the Settlement. Permitting the Township to initiate discovery and litigate the allegations in I&E's Complaint at this juncture would create a chaotic proceeding that would waste time and resources that the Parties sought to avoid expending by entering into Settlement. All allegations in I&E's Complaint have been amicably resolved. Furthermore, any litigation of the I&E Complaint proceeding would most certainly cause the carefully crafted Settlement terms to fail³ potentially without the ability to achieve similar relief in a litigated outcome as SPLP has agreed to perform measures that exceed the requirements set forth in the Federal pipeline safety regulations.

d. The Township's Petition Introduces Unnecessary Issues.

16. Regarding the fourth standard, the Township's late-filed intervention unreasonably broadens the issues raised in I&E's Complaint in that the Township avers claims beyond SPLP's corrosion control program and cathodic protection practices concerning ME1. For example, the Township seeks to obtain information from SPLP by virtue of intervening in this proceeding for its unspecified "on-going review of Sunoco's Mariner East 1 pipeline." Township Petition at ¶ 18. Furthermore, the Township asserts it must participate for the safety of the public and preservation of protected environmental

³ See Paragraph 21 of the Settlement Agreement wherein a Party may elect to withdraw from the Settlement if any terms of the Settlement are modified.

assets in the Township. Township Petition at ¶ 19. Moreover, the Township claims an interest in this proceeding so that its staff and consultants may review information and data regarding ME1 so that the Township can assess the safety of the pipeline for its residents. Township Petition at ¶ 20. The Township's overly broad reasoning to intervene in this matter would impermissibly extend the issues beyond the narrow focus of I&E's enforcement proceeding, which examined SPLP's corrosion control and cathodic protection practices and procedures concerning ME1 upon the discovery of a leak that occurred outside of the Township's boundaries. Any concern regarding overall safety of ME1 is beyond the scope of this proceeding and already within the purview of I&E's duties and responsibilities.

17. The Township's true reason for intervention was revealed in its requests to obtain and review information from SPLP for its own purposes. Township Petition at ¶¶ 18 and 20. However, the Township is free to file a Complaint against the Company pursuant to 66 Pa.C.S. § 701 and pursue discovery in that proceeding without sabotaging the terms of the instant Settlement, which undoubtedly benefit the greater public.

18. Alternatively, if the Township's late-filed Petition is granted, it is well accepted that the late intervenor must accept the status of the proceeding as it exists. *Final Rulemaking for the Revision of Chapters 1, 3 and 5 of Title 52 of the Pennsylvania Code Pertaining to Practice and Procedure Before the Commission*, Docket No. L-00020156 (Order entered January 4, 2006) at 55. *See also West Penn Power Order* at 7 (granting a late-filed Petition to Intervene submitted by the administrators of the estate of a woman who was fatally injured when an electric distribution line fell onto her property. Although determining that the estate had standing to intervene, the Commission found that the estate had to take the record as it existed and provided the opportunity for the estate to comment on

the settlement). Here, this matter settled well before the Township filed its untimely Petition to Intervene, the Township should not be granted the right to discovery, an evidentiary hearing or the opportunity to introduce new evidence. Should the Township's late-filed Petition be granted, which it should not, the appropriate avenue for the Township to participate in this matter would be through the filing of comments regarding the Settlement, with the opportunity for I&E and SPLP to reply.

19. Apart from the lateness of the Petition, the Township has failed to demonstrate that the granting of the Petition would protect an interest that is not sufficiently represented by an existing party – in this case, I&E. Pursuant to Section 5.72 of the Commission's regulations, a petition to intervene may be filed by a person claiming a right to intervene or an interest of such a nature that intervention is necessary or appropriate to the administration of the statute under which the proceeding is brought. 52 Pa. Code § 5.72. Section 5.72 further provides that the interest may be one in which the person is directly affected by the proceeding and **“which is not adequately represented by the existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding.”** 52 Pa. Code § 5.72(a)(2)(emphasis added).

20. In order to confer standing in a proceeding, the interest must be substantial, immediate and direct. *William Penn Parking Garage, Inc. v. City of Pittsburgh*, 346 A.2d 269, 280 (1975). A “substantial” interest is an interest in the outcome of the litigation which surpasses the common interest of all citizens in procuring obedience to the law. *George v. Pa. Pub. Util. Comm’n*, 735 A.2d 1282, 1286 (Pa. Cmwlth. Ct. 1999), citing *Ken R. ex rel. C.R. v. Arthur Z.*, 682 A.2d 1267, 1270 (1996). A “direct” interest requires a showing that the matter complained of caused harm to the party's interest. *Id.* An “immediate” interest

involves the nature of the causal connection between the action complained of and the injury to the party challenging it and is shown where the interest the party seeks to protect is within the zone of interests sought to be protected by the statute or the constitutional guarantee in question. *Id.*

21. The Township is unable to demonstrate that it has a substantial interest in the outcome of this matter that surpasses the common interest of all citizens in having safe utility service. *Contra. West Penn Power Order* (a late-filed intervenor was permitted party status because the utility's alleged failure to comply with the Public Utility Code and resulting death and injuries that occurred on the intervenor's property constituted a substantial interest that could not be represented by another party). *See also Pa. Pub. Util. Comm'n, Bureau of Investigation and Enforcement v. UGI Utilities, Inc.*, Docket No. C-2012-2308997 (Order entered February 19, 2013 at 23-24) (Finding that the administrator of an estate had a substantial, direct and immediate interest in the outcome of the I&E enforcement proceeding before the Commission, which focused on a utility's compliance with the Public Utility Code and Commission regulations, as such outcome may affect a pending wrongful death action in the Court of Common Pleas). Here, by contrast, the Township has no greater interest than any other Pennsylvania citizen in the safe operation of SPLP's pipelines, which traverse the Commonwealth, and that overall interest is charged to I&E and already adequately represented as witnessed by the favorable terms achieved in the Settlement.

22. The Township failed to demonstrate a direct interest in this proceeding by showing how SPLP's corrosion control program and cathodic protection practices harmed its interest when the leak investigated by I&E was located outside of the Township's boundaries and at least fifteen (15) miles away.

23. The Township did not demonstrate an immediate interest as it cannot show a causal connection between the allegations raised by I&E and injury that the Township would experience that would not otherwise be protected by I&E. *See* the discussion in Paragraph No. 22, *supra*.

24. I&E is the entity tasked with protecting the interests of the public by taking appropriate enforcement actions to ensure compliance with the Public Utility Code, Commission regulations and orders. 66 Pa.C.S. § 308.2(a)(11); *See also Implementation of Act 129 of 2008; Organization of Bureaus and Offices*, M-2008-2071852 (Order entered August 11, 2011). I&E, which includes the I&E Safety Division that is staffed with engineers who possess an expertise in pipeline safety, is the entity with the technical knowledge to interpret and evaluate alleged pipeline safety violations. The Township does not contend that it brings any expertise whatsoever relating to pipeline safety. Indeed, the Township seemingly desires intervention to conduct a fishing expedition for information for its own purposes. The public interest is not protected or better served in any way by allowing the Township to intervene in this matter and espouse unspecified, unnecessary or unrelated concerns that will only detract from the efforts made by I&E to reach a resolution of its Complaint that is by all measures a solid victory for this Commonwealth and its citizens.

III. CONCLUSION

For all of the foregoing reasons, the Bureau of Investigation and Enforcement respectfully requests that the late-filed Petition to Intervene of Upper Uwchlan Township be denied and that the Settlement Agreement be ruled upon and approved as being in the public interest without further delay.

Respectfully submitted,



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Senior Prosecutor
PA Attorney ID No. 207522

Michael L. Swindler
Deputy Chief Prosecutor
PA Attorney ID No. 43319

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Dated: July 1, 2019

I&E Exhibit 1

Governor Wolf Issues Statement on DEP Pipeline Permit Bar

February 08, 2019

Energy, Environment, Press Release, Statement

Harrisburg, PA – Governor Tom Wolf today released the following statement in response to the Department of Environmental Protection's suspension of review of all clean water permit applications and other pending approvals associated with the Energy Transfer, L.P. (ET) and subsidiaries until further notice due to non-compliance:

"The Department of Environmental Protection has acted swiftly and decisively to hold this operator accountable to the conditions of its permits. The permit bar by the Department of Environmental Protection is the latest step my Administration has taken to ensure pipeline operators and builders are accountable for the work they do in Pennsylvania. There has been a failure by Energy Transfer and its subsidiaries to respect our laws and our communities. This is not how we strive to do business in Pennsylvania, and it will not be tolerated."

The permit bar will affect the in-service date for the Revolution pipeline, which is currently not in service, and the Mariner East 2 pipeline. There are 27 approvals currently under review by DEP for Mariner East 2. The Revolution pipeline will remain closed until full compliance has been achieved.

In addition to the permit bar, the governor called on the Pennsylvania Public Utility Commission (PUC) to continue to hold Energy Transfer (ET) and its subsidiaries accountable to stringent safety requirements which the PUC is charged with enforcing. The governor noted that the budget he proposed earlier this week funds four new gas safety inspectors at the Public Utility Commission's Pipeline Safety Division to increase the PUC's capacity to hold pipeline operators accountable and ensure all safety requirements are strictly enforced."

"Today, I am calling upon the Public Utility Commission to compel ET to address lapses in communication by immediately providing county and municipal agencies responsible for public safety along the Mariner East Project route any and all information required under state and federal law to enable the preparation of robust emergency preparedness and communication plans. I have directed the Pennsylvania's Emergency Management Agency (PEMA) to coordinate with county and local leadership to assist with review of emergency management plans, and this engagement has already begun."

"I am also calling upon the PUC to require that a remaining life study of Mariner East 1 be completed and reviewed by independent experts. Such a study should thoroughly evaluate the safety of the existing pipeline and prepare a plan to implement the findings of that study as soon as possible.

State agencies have provided unprecedented oversight over the Mariner East Project, issuing more than 80 violations and levying nearly \$13 million in penalties. The Department of Environmental Protection has also implemented significant new processes as a result of the experience gained on a project of unprecedented scope and impact including:

- Improved coordination with the PUC and Federal Energy Regulatory Commission (FERC);
- Improved internal coordination and implementation through the establishment of a Regional Pipeline Permitting Coordination Office;
- And the development of new permit conditions and policy guidelines for future pipeline development projects including more than 100 special permit conditions.

Finally, the governor has called on the General Assembly to address gaps in existing law which have tied the hands of the Executive and independent agencies charged with protecting public health, safety and the environment, calling for the speedy passage of the following legislation to protect the public:

- No state agency currently has authority to review intrastate pipeline routes, which can result in pipeline companies deciding to site through densely populated high-consequence areas. Many states have passed legislation providing an enhanced role in

siting decisions to their utility or public service commission. Legislation should provide the Public Utility Commission with authority to regulate siting and routing of intrastate pipelines in Pennsylvania.

- Currently, pipeline operators are not required to provide information to schools which are in close proximity to a pipeline, including how to respond to a leak. Legislation should require this information for schools within 1,000 feet of a pipeline.
- Related legislation should require public utility facilities transporting natural gas or natural gas liquids to meet with the county emergency coordinator entrusted to respond in the event of natural gas release and provide vital emergency response and evacuation information.
- In order to respond to a potential leak, automatic or remote shutoff valves are critical. Legislation should require the installation of such valves in high consequence areas in compliance with federal requirements for transmission line valves.

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Pennsylvania Public Utility Commission,
Bureau of Investigation and Enforcement,
Complainant,

v.

Sunoco Pipeline, L.P. a/k/a
Energy Transfer Partners,
Respondent

Docket No. C-2018-3006534

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

Notification by First Class Mail and Electronic Mail:

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Dated: July 1, 2019