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REPLY TO:  
Center City

July 15, 2019

*Via Electronic Filing*

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

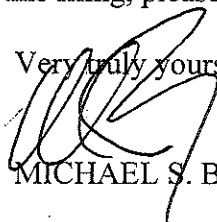
Re: Bureau of Investigation & Enforcements v.. Sunoco Pipeline L.P.,  
Docket No. C-2018-3006116 and P-2018-3006117  
**FLYNN COMPLAINANTS' ANSWER TO PRELIMINARY  
OBJECTIONS TO SECOND AMENDED FORMAL COMPLAINT**

Dear Secretary Chiavetta:

Attached for electronic filing with the Commission is Flynn Complainants' Answer to Preliminary Objections to Second Amended Formal Complaint in the above referenced case.

If you have any questions regarding this filing, please contact the undersigned.

Very truly yours,

  
MICHAEL S. BOMSTEIN, ESQ.

MSB:mik

cc: Per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MEGHAN FLYNN	:	
ROSEMARY FULLER	:	
MICHAEL WALSH	:	
NANCY HARKINS	:	
GERALD MCMULLEN	:	DOCKET NO. C-2018-3006116
CAROLINE HUGHES and	:	
MELISSA HAINES	:	DOCKET NO. P-2018-3006117

Complainants :

v. :

SUNOCO PIPELINE L.P., :  
Respondent :

**COMPLAINANTS' RESPONSE IN OPPOSITION  
TO PRELIMINARY OBJECTIONS TO COMPLAINANTS'  
SECOND AMENDED FORMAL COMPLAINT**

Complainants, having been served with the Preliminary Objections of Sunoco Pipeline L.P. ("Sunoco") to the Second Amended Formal Complaint, and desiring to respond thereto, hereby answer as follows:

1. Denied as stated. Admitted only that paragraphs 67 – 93 of the Second Amended Complaint need not be answered in light of the ALJ's ruling.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Denied as stated. Admitted only that ALJ Barnes ruled as quoted by Respondent.

8. Denied as stated. ALJ Barnes did not rule that Complainants were to amend the Second Amended Complaint nor did Complainants seek leave to amend that pleading to remove the said paragraphs. The ALJ gave leave to file the Second Amended Complaint and that is what Complainants did. Complainants had no expectation that Sunoco would respond or be required to respond to paragraphs 67 – 93.

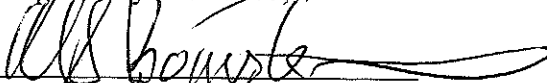
9. Denied as stated. By way of further explanation, see response to paragraph 8, above, which is incorporated herein.

10. Denied as stated. Admitted only that the ALJ has so ruled.

11. Denied as stated. The ALJ's ruling on paragraphs 67 – 93 of the Second Amended Complaint was interlocutory and, therefore, not appealable. The judge, however, already has stricken the said paragraphs.

WHEREFORE, the ALJ already having stricken paragraphs 67 – 93 of the Second Amended Complaint, Sunoco's Preliminary Objections were unnecessary and should, therefore, be denied.

Respectfully submitted,



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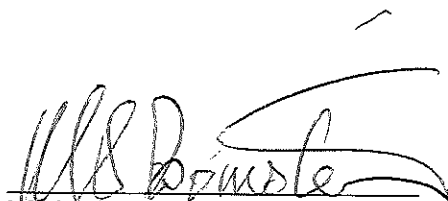
Attorney for Complainants

Dated: July 15, 2019

**CERTIFICATE OF SERVICE**

I hereby certify that on this day, July 15, 2019, a true and correct copy of the foregoing has been served upon the following persons via electronic mail, pursuant to 52 Pa. Code § 1.54.

**SEE ATTACHED LIST**

A handwritten signature in black ink, appearing to read "Michael S. Bomstein", with a large, sweeping flourish extending to the right.

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(Revised 6.6.19)

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