



March 23, 2020

Rosemary Chiavetta, Esq., Secretary  
Pennsylvania Public Utility Commission  
PO Box 3265  
Harrisburg, PA 17105-3265

**Via Electronic Filing**

*RE: Flynn et.al. v. Sunoco Pipeline L.P., Lead Docket C-2018-3006116  
Andover Homeowners' Association, Inc's Answer to Motion for Stay*

Dear Secretary Chiavetta,

On behalf of the Andover Homeowners' Association, Inc., please accept this letter as the response to the pending Motion to Stay these proceedings. The Association seeks a timely resolution of all matters before the Commission, because it is materially injured by the imposition of the risk associated with Sunoco's current and proposed industrial operations, given the lack of a credible plan to protect residents in harm's way from continued Sunoco highly volatile liquids accidents. The Association recognizes the importance of Sunoco suspending construction and maintenance activities in light of increasing COVID-19 transmission. That said, the Association believes that any stay in this matter should be tied to, and no longer than, the current construction stoppage ordered by the Governor last week. In fact, the Association is convinced that, should Sunoco seek authorization to restart construction, any consideration of such a request must only be provided in full consideration of the public safety risks and negative economic impact that would accompany such a restart.

Stay periods of longer than thirty (30) days at a time are not appropriate. The Association requests that any stay period be accompanied by a review within 21 to 25 days of the beginning of any such stay period to move the case forward within today's constraints. Such an Order from the Commission would not unduly burden anyone and would, upon the Governor relaxing today's current restrictions, allow the parties to organize for ongoing litigation regarding the unmitigated public safety risks associated with Sunoco's current and proposed operations.

Alternatively, the Association will agree to a longer stay only if it is accompanied Sunoco's agreement to provide a corresponding delay in attempting to restart construction activities. Any stay in proceedings that is longer than the construction shutdown would unduly prejudice and irreparably injure the Association, the Complainants, and aligned intervenors. Please contact me with any questions.

Sincerely,  
/s/  
Rich Raiders, Esq.

**C-2018-3006116 et. al.- MEGHAN FLYNN et. al. v. SUNOCO PIPELINE LP**

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