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December 1, 2020

## **VIA ELECTRONIC FILING**

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

Re: PA PUC Act 127 Registration Clarification; Docket No. A-2012-2294765

Dear Secretary Chiavetta:

Sunoco Pipeline L.P. (SPLP) respectfully submits the attached Act 127 Registration Clarification in response to Jeremy Haring's August 26, 2020 email notifying Sunoco Pipeline L.P./Energy Transfer that its 2019 annual registration has not been completed.

Very truly yours,

/s/ Whitney E. Snyder

Thomas J. Sniscak Whitney E. Snyder

Counsel for Sunoco Pipeline L.P.

WES/das Enclosure



December 1, 2020

Via Electronic Filing

Rosemary Chiavetta, Secretary Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street 2nd Floor North Harrisburg, PA 17105

Re: PA PUC Act 127 Registration Clarification; Docket No. A-2012-2294765

On August 26, 2020 Mr. Jeremy Haring sent an email notifying Sunoco Pipeline L.P./Energy Transfer (SPLP) that the Act 127 annual registration had not been completed for year 2019, which was due March 31, 2020 and referenced Docket No. A-2012-2294765.

Notification to SPLP appears to be a clerical error. The registration at Docket No. A-2012-2294765 is related to Sunoco Inc. Sunoco Inc. is not the same entity as SPLP. SPLP is not the operator of the assets registered at Docket No. A-2012-2294765. Sunoco Inc. ceased operations in September 2012 and transferred assets to new ownership as Philadelphia Energy Solutions Refining and Marketing (PESRM).

In 2013, due to transition of ownership and associated personnel of the Sunoco entities, Sunoco Legal Counsel requested that SPLP submit the 2013 Act 127 Registration filing for calendar year 2012 on behalf of the Sunoco Inc. corporate identity. The Registration and Payment was made with an electronic-filing submitted 6/27/2013. The Sunoco Inc. legal counsel signed this registration on behalf of the company and the filing was made to satisfy the registration requirements. However, SPLP only completed this one filing for Sunoco Inc., and does not own these assets. Instead, these assets were transferred to Philadelphia Energy Solutions Refining and Marketing. Refer to Docket # A-2015-2475345 PESRM – for the 2015 Filing – PUC Document #351692. The PESRM filing dated 3/27/2015 cover letter confirms transition of the assets from Sunoco INC to PESRM.

Thus, it is our understanding the assets previously owned and operated by Sunoco Inc. ACT 127 Registration were transitioned over to Philadelphia Energy Solutions (PES). A refinery accident in 2019 led to PES terminating operations. The PES refinery was shut down and as is public knowledge, the assets sold to a real estate development company.

Sunoco Pipeline L.P. respectfully requests the Commission correct the Act 127 registration records in this matter and close the Docket No A-2010-2294765 as Sunoco, Inc. no longer exists as a pipeline owner or operator since September 2012.

Please contact me if you wish to discuss this matter further.

Respectfully Submitted,

Albert Kravatz Digitally signed by Albert Kravatz Date: 2020,12.01 10:17:17

Albert Kravatz

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cc: J. Haring, L. Yalcin, (PA PUC) / T. Nardozzi, M. Milliken, C. Stambaugh, T. Sniscak, W. Snyder (SPLP)