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SAMUEL W. CORTES
Direct No: 610.458.4966
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February 12, 2021

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Re: Glen Riddle Station, L.P. v. Sunoco Pipeline L.P.; Docket No. C-2020-3023129

Dear Secretary Chiavetta:

This office represents Glen Riddle Station, L.P. (“GRS”), in the referenced action. Enclosed for electronic filing is GRS’s Supplemental Exhibits to its Petition for Interim Emergency Relief. If you have any questions with regard to this filing, please do not hesitate to contact me. Thank you.

Respectfully,

A handwritten signature in black ink, appearing to read 'Samuel W. Cortes', written over a light blue horizontal line.

Samuel W. Cortes

SWC:jcc
Enclosure

cc: Per Certificate of Service

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**COMMONWEALTH OF PENNSYLVANIA
BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

GLEN RIDDLE STATION, L.P.,	:	DOCKET NO. C-2020-3023129
Complainant,	:	
	:	
v.	:	
	:	
SUNOCO PIPELINE L.P.,	:	
Respondent.	:	

SUPPLEMENTAL EXHIBITS TO PETITION FOR INTERIM EMERGENCY RELIEF

Complainant, Glen Riddle Station, L.P. (“Complainant”), by and through its undersigned counsel, hereby files the attached Supplemental Exhibits to the Petition for Interim Emergency Relief (the “Petition”). After Complainant filed the Petition, counsel for Respondent, Sunoco Pipeline, L.P., sent a letter to counsel for Complaint, which is attached as Exhibit 5. Counsel for Complainant then responded by email, which is attached as Exhibit 6. These exhibits are intended to supplement the record with regard to the Petition for completeness.

Respectfully submitted,

FOX ROTHSCHILD LLP

February 12, 2021

By:



Samuel W. Cortes, Esquire
Attorney ID No. 91494
Attorneys for Complainant

**COMMONWEALTH OF PENNSYLVANIA
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PENNSYLVANIA PUBLIC UTILITY COMMISSION**

GLEN RIDDLE STATION, L.P.,	:	DOCKET NO. C-2020-3023129
Complainant,	:	
	:	
v.	:	
	:	
SUNOCO PIPELINE L.P.,	:	
Respondent.	:	

CERTIFICATE OF SERVICE

I hereby certify that, on February 12, 2021, I served a true and correct copy of the foregoing Supplemental Exhibits to Petition for Interim Emergency Relief upon the persons listed below and by the methods set forth below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party):

Email and First Class U.S. Mail
Thomas J. Sniscak, Esquire
Whitney E. Snyder, Esquire
Hawke, McKeon & Sniscak LLP
100 North Tenth Street
Harrisburg, PA 17101



Samuel W. Cortes, Esquire

EXHIBIT 5

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MYANMAR

ALLIANCES IN MEXICO
AND SRI LANKA

February 11, 2021

VIA E-MAIL

Samuel W. Cortes, Esq.
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scortes@foxrothschild.com

James R. Flandreau, Esq.
Middletown Township Solicitor
Paul, Flandreau & Berger LLP
320 West Front Street
Media, PA 19063
jflandreau@pfbllaw.com

Re: Glen Riddle Station Apartments

Dear Sam and Jim:

I write to provide additional information regarding the sign that was placed at the entrance to the construction area at Glen Riddle Station Apartments and that was brought to our attention by Mr. Cortes's letter of this morning.

First, we have been informed that representatives of Glen Riddle Station have attempted to access the construction area in recent days. The sign that was placed was intended to warn against the risk of unauthorized entry to the construction area, in light of these recent events.

Of course, as you know, Glen Riddle Station residents, personnel, and vendors are not authorized to enter into the construction workspace or interfere with any work that is being performed. Entering the construction area without authorization and without the proper personal protective equipment is a safety risk. As you have asked that such communication come through

Samuel W. Cortes, Esq.
James R. Flandreau, Esq.
February 11, 2021
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you, please again reiterate this message to Glen Riddle Station residents, owners, personnel, and vendors.

Second, the particular sign shown in the photo Mr. Cortes attached to his letter was placed in error by a ground-level contractor.

The construction contractor intended to place a sign informing readers that access to the construction site is restricted, and placed the only type of sign it had on hand. The message in the sign that was placed, that there is “danger” and that people should “keep 100 yds. from work activities,” is not accurate for the Glen Riddle Station Apartments property. There is no safety risk to Glen Riddle residents.

The choice of the photographed sign was made at the ground level by a contractor; it was not run up the chain, and management had no knowledge that this particular sign would be placed. In short, it was an inadvertent error. Upon receipt of your letter, Sunoco Pipeline immediately instructed the contractor to remove the sign in question. That has been done.

Signs will be placed at the three construction entrances on the property with the message that was and is intended. They will read, “CONSTRUCTION SITE DO NOT ENTER”.

Very truly yours,

/s/ George J. Kroclic

George J. Kroclic

GJK

cc: Curt Stambaugh, Esq.

EXHIBIT 6

Chernesky, Jean C.

From: Cortes, Samuel W.
Sent: Thursday, February 11, 2021 6:45 PM
To: Amerikaner, David B.; Beach, Ashley L.; jflandreau@pfblaw.com
Cc: Kroculick, George J.; Chernesky, Jean C.; Kuebler, Tara L.
Subject: RE: Glen Riddle Station

George:

Your letter does not respond to our inquiry from earlier and, in what is becoming an unfortunate pattern, makes unsubstantiated and baseless allegations. First, you claim that Sunoco intended to post signs indicating that no one should “enter the construction site.” Those signs have already been on the site for weeks. Why would Sunoco intend to post what it already posted and what was already on the site? This explanation is nonsensical.

Second, you again make accusations about Glen Riddle personnel entering the worksite, without offering any evidence of this. None exists, as that accusation is false – as it has always been when you have made it. Glen Riddle continues to monitor Sunoco on the property because of Sunoco’s and the Township’s disregard for safety. That monitoring occurs outside of the work area, as is evidenced by photographs and videos of my client’s and your client’s activities. I understand that your client has also photographed our representatives. Please review those photographs before making baseless accusations that only further increase the mistrust, concern, and animosity here.

Third, I do not know what you are referencing when you say that communications to Glen Riddle residents, vendors, etc. must come through me. Your client certainly has not followed that when shouting at my client and its representatives or when posting signage on the property. We also understand that Sunoco representatives (Mr. McGinn and others) have called and met with Glen Riddle residents without even notifying me or my client. Sunoco is responsible under its Public Awareness Plan to communicate with Glen Riddle and its residents. Certainly, you can coordinate such communication with me and I will help facilitate it. But no such edict exists as evidenced by your client’s own conduct. In any event, neither my office nor anyone at my client have heard anything from you or your client on this issue. Nor will we communicate anything to anyone until we better understand what is going on here. That requires something more than unsubstantiated statements in a letter from you.

Please provide the information I requested earlier today so that we may evaluate this issue. Please also provide a communication that your client suggests providing to all affected residents, with some support from Sunoco’s engineers, as to what the “danger” was that the signs intended to warn against and what Sunoco relied on to decide that it could remove those signs in favor of the signage that already existed at the property.

Thank you.

Sam

Samuel Cortes

Partner

Fox Rothschild LLP

Eagleview Corporate Center

747 Constitution Drive, Suite 100, PO Box 673

Exton, PA 19341

(610) 458-4966 - direct

(610) 458-7337- fax

SCortes@foxrothschild.com

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From: Amerikaner, David B. <DBAmerikaner@duanemorris.com>

Sent: Thursday, February 11, 2021 5:24 PM

To: Cortes, Samuel W. <SCortes@foxrothschild.com>; Beach, Ashley L. <abeach@foxrothschild.com>;
jflandreau@pfblaw.com

Cc: Kroclic, George J. <GJKroclic@duanemorris.com>

Subject: [EXT] Glen Riddle Station

Counsel –

Please see the attached correspondence relating to the letters and emails of today, February 11.

David Amerikaner

Special Counsel

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