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February 16, 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 a Petition to Withdraw the Petition for Interim Emergency Relief, which has been executed jointly by counsel to GRS and Sunoco Pipeline, L.P. 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.	:	

**PETITION PURSUANT TO 52 PA. CODE § 5.94 TO WITHDRAW THE PETITION
OF GLEN RIDDLE STATION L.P. FOR INTERIM EMERGENCY RELIEF
AS MOOT DUE TO RESOLUTION**

AND NOW, this 16th day of February, 2021, the undersigned counsel for the parties in the above-captioned matter hereby jointly agree to this petition (“Withdrawal Petition”) and the conditions set forth below for the withdrawal of the Petition of Glen Riddle Station, L.P. (“GRS”) for Interim Emergency Relief (the “ER Petition”) as moot due to a resolution as follows:

1. On February 11, 2021, GRS filed the ER Petition pursuant to 52 Pa. Code § 3.6 after Respondent, Sunoco Pipeline, L.P. (“Sunoco”), posted certain signs (the “Signs”) at GRS’s property warning that areas within 100 yards of its worksite at Complainant’s property fall within a “danger” area that must be avoided.

2. In accordance with the attached verification, Sunoco hereby confirms that the Signs were placed by its contractors in error and that there is no danger zone associated with Sunoco’s construction activities at GRS’s property outside of Sunoco’s worksite. Sunoco further avers that it has taken reasonable steps to prevent the future placement of signs in error at GRS’s property. [See Verification of Joseph Becker, attached hereto.]

3. In the ER Petition, GRS sought an Order enjoining and restraining Sunoco from engaging in further work at GRS's property until the approval of a plan addressing the scope of the danger area created by Sunoco's work, providing for the safety of those within its vicinity, and providing for appropriate communication regarding the same to the affected public.

4. On February 12, 2021, following a telephonic conference with Deputy Chief Administrative Law Judge Joel Cheskis, an Order was entered setting an Initial Evidentiary Hearing for Thursday, February 18, 2021.

5. The parties have since resolved the issues set forth in the ER Petition.

6. Sunoco has agreed to hold a Town Hall meeting on Tuesday, February 23, 2021, with the owners, management, employees, representatives, and residents of GRS (the "Town Hall Meeting").

7. Sunoco will have qualified individuals attend and speak at the Town Hall Meeting to explain the Signs used at the site, to discuss the work at the site and the safety of the GRS residents and GRS personnel, and to answer any questions regarding these matters.

8. Sunoco shall provide notice to, and communicate with, GRS before placing any signage at the site similar to the Signs. Sunoco shall take all reasonable steps necessary to prevent errors similar to those made by its contractors here from occurring at GRS in the future.

9. As a part of the above-identified agreement to resolve the ER Petition, GRS waives its right to a hearing within 10 days of filing its ER Petition as provided by 52 Pa. Code § 3.6a and its right to a decision within 15 days of filing an ER Petition as provided by 52 Pa. Code § 3.7(a).

10. This Withdrawal Petition, joined by Sunoco, shall be approved in accordance with 52 Pa. Code § 5.94 within two (2) business days after the Town Hall Meeting, provided that

Sunoco complies with its obligations identified above. GRS shall provide notice of such compliance or identify any non-compliance by submission to the Commission within two (2) business days after the Town Hall Meeting.

11. GRS and Sunoco also agree to extend the deadline for Sunoco to respond to the ER Petition until at least one week after the scheduled date for the Town Hall Meeting – i.e., February 23, 2021.

WHEREFORE, Sunoco and GRS respectfully request that this Withdrawal Petition, unopposed by Sunoco, be approved and effective pursuant to 52 Pa. Code § 5.94 as stated above.

HAWKE, McKEON & SNISCAK LLP

/s/ Thomas J. Sniscak
Thomas J. Sniscak, Esquire
Whitney E. Snyder, Esquire
100 North Tenth Street
Harrisburg, PA 17101
Counsel for Sunoco Pipeline, L.P.

FOX ROTHSCHILD LLP


/s/ Samuel W. Cortes
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Counsel for Glen Riddle Station, L.P.

EXHIBIT A

VERIFICATION

I, Joseph Becker, Senior Director, Engineering & Construction for Sunoco Pipeline L.P., hereby state that the facts above set forth in paragraph 2 of the foregoing Petition are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

On behalf of and as authorized by Sunoco Pipeline L.P.:



Joseph Becker
Senior Director, Engineering & Construction
Sunoco Pipeline L.P.

Dated: February 16, 2021