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June 30, 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:

Enclosed for electronic filing are the Exhibits to the Motion of Glen Riddle Station, L.P., to Compel Responses of Sunoco Pipeline L.P. (“Sunoco”) to Interrogatories and Request for Production of Documents – Set IV , in the above-referenced matter. If you have any questions with regard to this filing, please do not hesitate to contact me. Thank you.

Respectfully,

Samuel W. Cortes

SWC:jcc
Enclosure

cc: Per Certificate of Service

A Pennsylvania Limited Liability Partnership

California Colorado Delaware District of Columbia Florida Georgia Illinois Minnesota
Nevada New Jersey New York North Carolina **Pennsylvania** South Carolina Texas Washington

**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.	:	

**COMPLAINANT’S RESPONSE TO RESPONDENT’S MOTION *IN LIMINE* TO
(1) STRIKE PORTIONS OF GRS’S SURREBUTTAL “THAT VIOLATE THE
COMMISSION’S REGULATIONS AND SUNOCO’S DUE PROCESS;”
(2) MODIFY THE PROCEDURAL SCHEDULE TO ALLOW SUNOCO TO PRESENT
ORAL REJOINDER TO RESPOND TO “NEW TESTIMONY BEYOND THE SCOPE
OF SUNOCO’S REBUTTAL TESTIMONY AND EXHIBITS;”
(3) REQUEST FOR ADDITIONAL HEARING TIME AND DATES; AND
(4) REQUEST FOR EXPEDITED 4-DAY RESPONSE PERIOD**

Complainant, Glen Riddle Station, L.P. (“GRS”), by and through its undersigned counsel, hereby files this Response to the Motion *in Limine* of Respondent, Sunoco Pipeline L.P. (“Sunoco”), to (1) Strike Portions Of GRS’s Surrebuttal That “Violate The Commission’s Regulations And Sunoco’s Due Process;” (2) Modify The Procedural Schedule To Allow Sunoco To Present Oral Rejoinder To Respond To “New Testimony Beyond The Scope Of Sunoco’s Rebuttal Testimony And Exhibits;” (3) Request For Additional Hearing Time And Dates; And (4) Request For Expedited 4-Day Response Period (the “Motion”).

First, the Commission should deny Sunoco’s requested relief with respect to the portions of GRS’s Surrebuttal Testimony that it seeks to strike (the “Challenged Testimony”) because the Challenged Testimony complies with 52 Pa. Code § 5.243(e). Likewise Sunoco, as Respondent, should not be permitted additional rejoinder. Second, although GRS does not oppose Sunoco’s request for oral rejoinder to respond to GRS’s testimony on issues arising after March 15, 2021,

GRS requests an opportunity to provide surrebuttal to that rejoinder and, as such, requests that Sunoco provide a proffer of its testimony at least one week in advance of the hearings. Third, GRS defers to Deputy Chief Administrative Law Judge Joel H. Cheskis regarding the timing of the hearings. Finally, Sunoco's request for a four-day response period is moot.¹

1. The Challenged Testimony Complies With 52 Pa. Code § 5.243(e).

52 Pa. Code § 5.243(e) does not preclude the Challenged Testimony. As such, it should not be stricken and Sunoco should not be allowed rejoinder. See 52 Pa. Code § 5.242(a) (explaining that “the party having the burden of proof, shall open and close unless otherwise directed by the presiding officer”).

Sunoco's assertion that the Surrebuttal Testimony should have been introduced in GRS's case in chief fails as does Sunoco's reliance on In Pa. Public Utility Comm. v. Total Environmental Solutions, Inc., 103 Pa. P.U.C. 110, 22008 WL 4145507, *45 (Pa. P.U.C. 2008). In Total Environmental, the Commission stated as follows: “The clear purpose of [52 Pa. Code § 5.243(e)] is to avoid trial by ambush and the prevention of surprise can only be achieved *if the parties are confined to the scope of their direct case.*” (Internal citations omitted, emphasis added.) Here, as set forth below, the Surrebuttal Testimony directly responds to Sunoco's Rebuttal Testimony. As such, unless Sunoco argues that its own Rebuttal Testimony went beyond the scope of GRS's Direct Testimony, the Surrebuttal Testimony is necessarily confined to GRS's case-in-chief. That is not the case because Sunoco states “importantly, [Sunoco] is only moving to strike portions of GRS's Surrebuttal testimony that are *not responsive* to [Sunoco's] rebuttal....” [Motion, p. 9 (emphasis in original).]

¹ On Wednesday, June 23, 2021, Your Honor allowed GRS to respond to the Motion by June 30, 2021.

Sunoco’s reliance on the cases cited at page 7 of its Motion is likewise misplaced. Each case cited by Sunoco is a rate case in which the utility presented entirely new claims for the first time in rebuttal. See Pa. PUC v. UGI Utilities, Inc., No. R-00932862, 1994 Pa. PUC Lexis 138, *85 (finding that the utility acknowledged that it failed to raise claim for certain expenses in its direct testimony); Pa. PUC v. Total Environmental Solutions, Inc., R-00072493, 103 Pa. P.U.C. 110 (recognizing that the company acknowledged that the “information provided in its original filing and in discovery was incorrect, and it provided that new information on rebuttal in order to correct these failures from its case-in-chief”); Pa. PUC v. Total Environmental Solutions, Inc. – Treasure Lake Water Division (“TESI”), No. R-00072493, 2008 Pa. PUC Lexis 42, at **114-116 (Pa. P.U.C. May 23, 2008) (“The data TESI provides as justification for this expense was not provided in TESI’s case-in-chief, nor in discovery requests asking for salary and wage information, nor did TESI indicate that final or correct numbers were forthcoming.”); City of Lancaster (Sewer Fund) v. Pa. PUC, 793 A.2d 978, 984 (Pa. Commw. Ct. 2002) (holding that city improperly proffered direct evidence of wage increase only in the rebuttal phase of the rate proceeding).

Here, the Challenged Testimony directly responds to Sunoco’s Rebuttal Testimony. GRS responds to the Challenged Testimony by expert, below.

a. Joseph Wittman, P.E.

Joseph Wittman is a licensed professional engineer, who rebuts Sunoco’s testimony with respect to construction related noise issues at GRS’s Property caused by the work undertaken there by or on behalf of Sunoco. [Wittman Surrebuttal, 4:6-11]. Sunoco seeks to strike the majority of Mr. Wittman’s testimony, claiming that the testimony “shores-up” GRS’s Direct Testimony and should have been provided in GRS’s case-in-chief. [Motion, p. 10]. As set forth below, the

Surrebuttal Testimony that Sunoco seeks to strike responds directly to testimony and opinions offered by Sunoco’s witnesses, including Seth Harrison, P.E., David Amerikaner, and Joe Becker:

Wittman’s Surrebuttal Testimony That Sunoco Seeks To Strike	Sunoco Testimony That Wittman Rebutts
5:10-6:20	Mr. Wittman rebuts testimony and opinions offered by Mr. Harrison regarding GRS’s sound measurements presented in GRS-5 and GRS-33. [Harrison Rebuttal, 6:5-8:4].
6:21-9:11	Mr. Wittman rebuts Mr. Harrison’s testimony regarding his interpretation of the Middletown Township’s noise ordinance and how it applies to Sunoco’s construction at the Property. [Harrison Rebuttal, p. 5:6-6:3].
9:12-10:5	Mr. Wittman rebuts Mr. Harrison’s opinion that GRS’s sound measurements were inaccurate and responds directly to Mr. Harrison’s claim that GRS’s sound measurements may be “inflated by as much as 3dBA.” [Harrison Rebuttal, 7:1-11].
10:6-11:19	Mr. Wittman rebuts Mr. Harrison’s testimony with respect to the Noise Impact Assessment Report (August 20, 2020) and Operational Sound Level Survey Results (March 10, 2021) prepared by Behrens and Associates, Inc. [Harrison Rebuttal, 8:6-10:4].
11:20-12:13	Mr. Wittman rebuts Mr. Harrison’s opinion that the sound walls implemented by Sunoco effectively addressed the noise problems at the site. [Harrison Rebuttal, 8:6-11:16].
12:14-13:13	Mr. Wittman rebuts Sunoco’s testimony, including that offered by David Amerikaner and Joe Becker, that Sunoco appropriately communicated with and consulted GRS and its residents during the sound mitigation planning process. [Amerikaner Rebuttal, 2:21-16:18; Becker Rebuttal, 6:16-8:22]. Mr. Wittman also rebuts Mr. Harrison’s claim that the harmful, noising-causing vacuum trucks at the site were only active for a “few minutes at a time.” [Harrison Rebuttal, 6:5-22].
15:1-16:8	Mr. Wittman rebuts Mr. Harrison’s testimony regarding the Behrens and Associates, Inc.’s reports dated August 20, 2020, March 10, 2021, and April 9, 2021. [Harrison Rebuttal, 8:15-10:4].

16:10-18:16	Mr. Wittman rebuts Mr. Harrison’s opinions that the “24-hour noise exposure level experienced in the Glen Riddle Apartments is not likely to exceed the OSHA 24-Hour noise exposure threshold of 85 dBA for hearing damage,” and that the sound levels experienced inside the apartments are not high enough to cause hearing damage and that they are, therefore, not unsafe. [Harrison Rebuttal, 6:18-22; 7:22-8:6; 9:15-10:4; 12:15-22].
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b. Jay Etzel, P.E.

Jay Etzel, P.E., is a highly respected expert on traffic safety issues who rebuts the testimony of Sunoco witnesses Chad Farabaugh and Gregory G. Noll. [Etzel Surrebuttal, 3:7-18.] Mr. Farabaugh describes his testimony as addressing “unsafe traffic and pedestrian patterns in place at the property during construction activities.” [Farabaugh Rebuttal, 2:15-19.] Mr. Noll describes his testimony as responsive to the testimony of Mr. Iacobucci and Mr. Culp and providing conclusions on their “concerns relating to [e]mergency response and fire safety issues...concerns that there is a fire safety hazard created by the construction work area, including the sound walls that are in place at the property, and traffic/access issues for emergency response vehicles to the property.” [Noll Rebuttal, 6:11-17.] Mr. Etzel rebuts the conclusions of Mr. Noll and Mr. Farabaugh, opining that Sunoco did not adequately address traffic or fire safety issues on the Property. [Etzel Surrebuttal, 3:9-17.]

GRS responds to the specific portions of Mr. Etzel’s testimony that Sunoco seeks to strike below.

Etzel’s Surrebuttal Testimony That Sunoco Seeks To Strike	Sunoco Testimony That Etzel Rebuts
3:10-18	Mr. Etzel’s summary of his testimony mirrors the summaries of the testimony of the Sunoco witnesses he rebuts. [Farabaugh Rebuttal, 2:15-19; Noll Rebuttal, 6:11-17.]
3:19-20:3; 4:11-20	Sunoco seeks to strike Mr. Etzel’s testimony that he visited the site and the description he provided of the site without any legal basis. This is appropriate background information for rebutting

	Mr. Farabaugh's conclusions after he visited the Property. [Farabaugh Rebuttal, 4:7-8.]
5:11-19	Mr. Etzel provided an example of an unsafe pedestrian circulation issue on the Property directly rebuts Mr. Farabaugh's testimony pertaining to the disruption of pedestrian circulation on the Property. [Farabaugh Rebuttal, 7:21-9:10.]
5:20-6:9	In response to exhibits GRS provided in its Direct Testimony evidencing traffic and pedestrian safety concerns, Mr. Farabaugh testified that the referenced pre-existing traffic pattern on the Property was more dangerous than the traffic patterns created by Sunoco's work. [Farabaugh Rebuttal, 13:6-14:13.] In Mr. Etzel's referenced testimony, he explains why Mr. Farabaugh's conclusion is incorrect and explains the basis for his conclusion that Mr. Farabaugh's conclusion is wrong, i.e., that Sunoco's work caused unsafe traffic circulation at the Property.
6:18-7:4	Mr. Etzel describes how Sunoco could have improved traffic circulation on the Property but, instead, made it more dangerous. This directly rebuts Mr. Farabaugh's testimony, referenced above, that Sunoco improved traffic conditions on the Property. [Farabaugh, 13:6-15:2.]
7:6-8:17	Here, again, Mr. Etzel's testimony responds to Mr. Farabaugh's rebuttal that Sunoco adequately maintained the safety of the GRS parking areas by providing certain alleged training to its drivers. [Farabaugh Rebuttal, 7:1-6.] Mr. Farabaugh also placed the burden on GRS to make the parking areas more safe during Sunoco's work on the Property. [Farabaugh Rebuttal, 14:16-17; 15:1-2.] In the referenced testimony, Mr. Etzel responds to these assertions by explaining that proper communication from Sunoco to GRS would have been the best course to prevent the dangerous conditions on the Property.
9:6-10:20	Mr. Etzel's testimony pertaining to the safety of the school bus stops on the Property insofar as they were impacted by Sunoco's work on the Property directly responds to Mr. Farabaugh's testimony on the same issue. [Farabaugh Rebuttal, 11:10-13:4.] In his testimony Mr. Farabaugh purportedly responds to concerns raised by Mr. Iacobucci [9:11-19] and Mrs. Johanna Rincon [generally] regarding the safety of the school bus stops as impacted by Sunoco's work.

	Mr. Farabaugh testifies regarding each of the issues that Sunoco asserts are “ <i>not responsive</i> ” [Motion, p. 9 (emphasis in original); Farabaugh Rebuttal, 11:10-13:4.]
11:10-14	Mr. Etzel points out the flaws in Mr. Noll’s assessment that emergency vehicles can safely access the residences on the Property because Middletown Fire Company and Rocky Run Fire Company purportedly accessed certain buildings. [Noll Rebuttal, 10:14-22.]
11:23-12:11	Mr. Etzel directly rebuts Mr. Becker’s testimony that “there is no safety concern” associated with the stacking of trucks at the Property. [Becker Rebuttal, 9:20-10:4]
12:13-14:23	<p>Mr. Etzel concludes that Sunoco failed regarding traffic circulation, interaction with residents, and parking lot safety [Etzel Surrebuttal, 12:13-13:18], which directly rebuts the conclusions of Mr. Farabaugh on the same topics [Farabaugh Rebuttal, 4:1-5:12; 6:8-11:8.]</p> <p>Mr. Etzel’s conclusions regarding Sunoco’s failure to address the issues associated with the school bus stops [13:20-14:5] directly rebut the conclusions of Mr. Farabaugh on the same topic. [Farabaugh Rebuttal, 11:10-13:4.]</p> <p>Mr. Etzel’s conclusions regarding Sunoco’s failure to adequately communicate with GRS and the GRS residents regarding the traffic safety at the Property [Etzel Surrebuttal, 14:6-15] directly rebut the conclusions of Mr. Farabaugh that Sunoco has not created an unsafe situation at the Property. [Farabaugh Rebuttal, 14:14-15:2 (suggesting that the burden was on GRS alone to make the Property safe during Sunoco’s work, and generally concluding that Sunoco’s actions with respect to the traffic on the Property were adequate to ensure safety).]</p>

c. James S. Davidson, Jr., P.E.

James S. Davidson, Jr., P.E., is an expert in fire safety engineering. Mr. Davidson describes the purpose of his testimony as rebutting “the testimony offered by Sunoco as it relates to the fire safety problems created by Sunoco’s pipeline construction work at [the Property.]” [Davidson Rebuttal, 4:2-6.] As set forth above, Mr. Noll describes his testimony as responsive to the

testimony of Mr. Iacobucci and Mr. Culp and providing conclusions on their “concerns relating to [e]mergency response and fire safety issues...concerns that there is a fire safety hazard created by the construction work area, including the sound walls that are in place at the Property, and traffic/access issues for emergency response vehicles to the property.” [Noll Rebuttal, 6:11-17.] Mr. Davidson responds to that testimony and provides specific examples to explain why, in his professional opinion, Mr. Noll is wrong. This is all appropriate surrebuttal testimony. 52 Pa. Code 5.243(e).

Davidson’s Surrebuttal Testimony That Sunoco Seeks To Strike	Sunoco’s Testimony That Davidson Rebutts
5:15-6:2	Mr. Davidson’s testimony regarding the emergency response issues posed by Sunoco’s sound walls directly rebuts Mr. Noll’s testimony that the sound walls are not a fire hazard and do not impact emergency access to the residences on the Property. [Noll Rebuttal, 8:17-9:3.]
6:10-7:15	Mr. Davidson explains the flaws in the December 10, 2020 Memorandum prepared by Mr. Drennan in response to Mr. Noll testifying that he (Mr. Noll) finds the referenced Memorandum more persuasive than the concerns set forth by Mr. Culp pertaining to emergency access. [Noll Rebuttal, 16:15-17:16.] Specifically, Mr. Davidson explains why the suggestions set forth by Mr. Drennan and endorsed by Mr. Noll fail to consider certain provisions of the International Fire Code (the “IFC”), which provisions Mr. Davidson believes must be followed from a safety standpoint.
8:2-15	Mr. Davidson explains why Mr. Noll’s testimony that the IFC does not apply to the Property is flawed and further responds to Mr. Noll’s testimony regarding Sunoco’s compliance with specific provisions of the IFC. [Noll Rebuttal, 9:19-13:16.]
8:22-9:21	Mr. Davidson testifies that the sound walls installed by Sunoco hinder Fire Department access and specifically, that although fire personnel could possibly navigate the various challenges created by Sunoco, they should not have to and may not have time to overcome the avoidable challenges presented by Sunoco’s sound walls. Mr. Davidson’s testimony directly rebuts Mr. Noll’s testimony that emergency responders can still

	safely respond to emergencies at the Property despite Sunoco’s sound walls. [Noll Rebuttal, 9:9-12; 14:4-17; 16:4-17.]
10:2-21	<p>Mr. Davidson’s conclusion that Mr. Noll’s testimony that the fire safety hazards present during Sunoco’s work on the Property are consistent with those encountered at garden apartment complexes in general is inaccurate directly responds to Mr. Noll’s conclusion. [Noll Rebuttal, 14:10-15:4.]</p> <p>Mr. Davidson’s conclusion that Mr. Noll’s statement that Sunoco’s work on the Property did not create new or different hazards on the Property is inaccurate responds directly to Mr. Noll’s testimony. [Noll Rebuttal, 15:21-16:2.]</p> <p>Mr. Davidson’s conclusion that Sunoco’s work on the Property presents fire safety risks or hazards, and/or a risk to human life directly rebuts Mr. Noll’s testimony regarding the safety of Sunoco’s work on the Property. [Noll Rebuttal, 8:22-9:3; 9:9-12; 10:18-19; 11:11-13; 12:8-10; 13:17-14:17; 15:6-16:2.]</p>

d. Jeffrey A. Davis, M.D.

Jeffrey A. Davis, M.D., is an otolaryngologist. He rebuts Sunoco’s testimony with respect to the construction related noise issues at GRS’s Property, with a focus on the impact that certain decibels of sound can have on human hearing. [Davis Surrebuttal, 2:14-20]. As set forth below, Dr. Davis responds directly to Sunoco’s claim that the “sound levels experienced inside the apartments are not high enough to cause hearing damage and that they are, therefore, not unsafe.” [Harrison Rebuttal, 8:2-4].

Davis’s Surrebuttal Testimony That Sunoco Seeks To Strike	Sunoco’s Testimony That Davis Rebuts
3:10-4:8	During his rebuttal testimony, Mr. Harrison claims that the noise levels at the site are safe and are “not high enough to cause hearing damage.” [Harrison Rebuttal, 8:2-4]. Dr. Davis responds by explaining that “Mr. Harrison ignores the Center for Disease Control guidance on noise and the practical reality of hearing loss and tinnitus that can result from exposure to noise.” [Davis Surrebuttal, 3:17-2]. Dr. Davis further rebuts Mr. Harrison’s reliance on the OSHA 24-hour noise exposure threshold of 85 dBA and explains that CDC guidance and NIOSH recommendations are

	standards that Sunoco should have followed. [Davis Surrebuttal, 4:3-8].
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In summary, all of the Challenged Testimony directly responds/rebutts the Rebuttal Testimony of Sunoco’s witnesses and is, therefore, necessarily within the scope of GRS’s direct testimony. Striking the Challenged Testimony would violate GRS’s due process rights and 52 Pa. Code § 5.243(e). Allowing Sunoco an opportunity to further respond is also inappropriate. See 52 Pa. § Code 5.242(a) (explaining that “the party having the burden of proof, shall open and close unless otherwise directed by the presiding officer”). If Your Honor strikes the Challenged Testimony, GRS respectfully requests that the relevant order be certified to the Commission as a material question pursuant to 52 Pa. Code § 5.305. See also Applications of Transource Pennsylvania, LLC for Approval of the Siting & Constr. of the 230 Kv Transmission Line Associated with the Indep. Energy Connection - E. & W. Projects in Portions of York & Franklin Ctys., Pennsylvania, Petitions of Transource Pennsylvania, LLC for A Finding That A Bldg. to Shelter Control Equip. at the Rice Substation in Franklin Cty., Pennsylvania & the Furnace Run Substation in York Cty., Pennsylvania, Nos. A-2017-2640195, A-2017-2640200, P-2018-3001878, P-2018-3001883, and A-2018-3001881, 2019 WL 1506801 (Pa. P.U.C. Mar. 29, 2019) (finding that the Administrative Law Judge’s decision to strike rebuttal testimony was reversible error).

2. GRS Agrees To Allow Sunoco Oral Rejoinder On The New Issues, If GRS’s Due Process Rights Are Protected.

GRS does not oppose Sunoco’s request for oral rejoinder to respond to GRS’s testimony on issues occurring after March 15, 2021. As the party with the burden of proof, however, GRS requests an opportunity to provide surrebuttal to that rejoinder and, as such, requests that Sunoco provide a proffer of its testimony at least one week in advance of the hearings. See 52 Pa. Code

§ 5.242(a) (explaining that “the party having the burden of proof, shall open and close unless otherwise directed by the presiding officer”); see also 52 Pa. Code § 5.242(a) (explaining that “the party having the burden of proof, shall open and close unless otherwise directed by the presiding officer”).

3. GRS Defers To ALJ Cheskis Regarding The Timing Of The Hearings.

GRS understands that the conference scheduled for July 2, 2021, is for the purpose of discussing the schedule.

4. The Request For Expedited Four-Day Answer Period Is Moot.

The request for expedited four-day answer period is moot because GRS was allowed until Wednesday, June 30, 2021, to respond to the Motion.

III. CONCLUSION

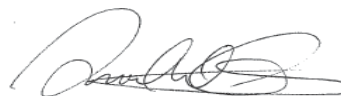
Based on the foregoing, GRS respectfully requests: (1) that the Commission deny Sunoco’s requested relief with respect to the Challenged Testimony. because the Challenged Testimony complies with 52 Pa. Code § 5.243(e); and (2) that the Commission grant GRS’s request to provide surrebuttal to any rejoinder and its request that Sunoco provide a proffer of its testimony at least one week in advance of the hearings.

Respectfully submitted,

FOX ROTHSCHILD LLP

June 30, 2021

By:



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

**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.	:	

CERTIFICATE OF SERVICE

I hereby certify that, on June 30, 2021, I served a true and correct copy of the foregoing Response to the Motion *in Limine* (the “Motion”) of Respondent, Sunoco Pipeline, L.P. (“Sunoco”), to (1) Strike Portions Of GRS’s Surrebuttal That Violates The Commission’s Regulations And Sunoco’s Due Process; (2) Modify The Procedural Schedule To Allow Sunoco To Present Oral Rejoinder To Respond To New Testimony Beyond The Scope Of Sunoco’s Rebuttal Testimony And Exhibits; (3) Request For Additional Hearing Time And Dates, And (4) Request For Expedited 4-Day Response Period (the “Motion in Limine”). 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

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