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SAMUEL W. CORTES
Direct No: 610.458.4966
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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

EXHIBIT A

Chernesky, Jean C.

From: Cortes, Samuel W.
Sent: June 28, 2021 3:04 PM
To: Bryce Beard; Beach, Ashley L.
Cc: Kevin McKeon; Whitney Snyder; Thomas Sniscak; Kuebler, Tara L.; Chernesky, Jean C.; Diana Silva
Subject: RE: Service Package - GRS COS for GRS Discovery Requests to Sunoco - Set IV(123993803.1).pdf

Bryce,

We are available to discuss this at your convenience. We will not withdraw the request. The Judge's Order preceded Mr. Noll's rebuttal testimony. Mr. Noll's opinions are based heavily upon what he claims are statements, recommendations, and reports from authorized agents of Middletown Township. Accordingly, Sunoco has now put the credibility of those statements, recommendations, and reports at issue in this case. This all occurred post-issuance of the Order you referenced below. This information is now highly relevant given the conflicting expert testimony on the issues identified in Noll's testimony.

Please advise if you will withdraw the objection. Thank you.

Sam

Samuel Cortes

Partner

Fox Rothschild LLP

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Suite 100

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From: Bryce Beard <brbeard@hmslegal.com>

Sent: June 28, 2021 11:59 AM

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

Cc: Kevin McKeon <KJMckeon@hmslegal.com>; Whitney Snyder <WESnyder@hmslegal.com>; Thomas Sniscak <TJSniscak@hmslegal.com>; Kuebler, Tara L. <TKuebler@foxrothschild.com>; Chernesky, Jean C. <JChernesky@foxrothschild.com>; Diana Silva <DSilva@mankogold.com>

Subject: [EXT] RE: Service Package - GRS COS for GRS Discovery Requests to Sunoco - Set IV(123993803.1).pdf

Sam and Ashley,

Below is SPLP's objection to GRS Set IV - No. 10. Please let me know if you'd like to have a call to discuss today.

Also, please let me know no later than 230pm today if a formal written objection will be required, or if GRS will withdraw the question per the ALJ's prior order.

10. Identify all payments of money made by Sunoco or its affiliates to the Township from January 1, 2018, through the present.

Objection – Pursuant to ALJ Cheskis' March 5, 2021 Order at page 8-9 on GRS's previous discovery on this same topic (GRS-I-19), this interrogatory seeks irrelevant information not reasonably tailored to lead to the discovery of admissible evidence in this proceeding and is overly broad and unduly burdensome. As a result, it is beyond the scope of discovery in this matter.

Regards,

Bryce R. Beard

Hawke McKeon & Sniscak LLP

www.hmslegal.com

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Harrisburg, PA 17101

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717-236-4841 (Fax)

brbeard@hmslegal.com

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NEW IRS RULES RESTRICT WRITTEN FEDERAL TAX ADVICE FROM LAWYERS AND ACCOUNTANTS. THIS STATEMENT IS INCLUDED IN OUTBOUND EMAILS BECAUSE EVEN INADVERTENT VIOLATIONS MAY BE PENALIZED. NOTHING IN THIS MESSAGE IS INTENDED TO BE USED, OR MAY BE USED, TO AVOID ANY PENALTY UNDER FEDERAL TAX LAWS. THIS MESSAGE WAS NOT WRITTEN TO SUPPORT THE PROMOTION OR MARKETING OF ANY TRANSACTION.

From: Cortes, Samuel W. <SCortes@foxrothschild.com>

Sent: Friday, June 25, 2021 2:53 PM

To: Bryce Beard <brbeard@hmslegal.com>

Cc: Kevin McKeon <KJMckeon@hmslegal.com>; Whitney Snyder <WESnyder@hmslegal.com>; Thomas Sniscak <TJSniscak@hmslegal.com>; Beach, Ashley L. <abeach@foxrothschild.com>; Kuebler, Tara L. <TKuebler@foxrothschild.com>; Chernesky, Jean C. <JChernesky@foxrothschild.com>

Subject: Service Package - GRS COS for GRS Discovery Requests to Sunoco - Set IV(123993803.1).pdf

Bryce,

Discovery requests are attached. Thank you.

Sam

Samuel Cortes

Partner

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EXHIBIT B



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Direct No: 610.458.4966
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June 25, 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 filing is a Certificate of Service Glen Riddle Station, L.P.'s Interrogatories and Request for Documents Directed to Sunoco Pipeline L.P. – 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 C-2020-3023129
Complainant,	:	
	:	
v.	:	
	:	
SUNOCO PIPELINE L.P.,	:	
Respondent.	:	

CERTIFICATE OF SERVICE

I hereby certify that I have, on this 25th day of June, 2021, served a true copy of Glen Riddle Station, L.P.’s Interrogatories and Requests for Documents on Sunoco Pipeline L.P.-Set IV upon the participants and by the methods set forth below, in accordance with the requirements of 52 Pa. Code § 1.54, as indicated below:

Email

Thomas J. Sniscak, Esquire
Whitney E. Snyder, Esquire
Kevin J. McKeon, Esquire
Bryce R. Beard, Esquire
Hawke, McKeon & Sniscak LLP
100 North Tenth Street
Harrisburg, PA 17101
TJSniscak@hmslegal.com
WESnyder@hmslegal.com
kjmckeon@hmslegal.com
brbeard@hmslegal.com



Samuel W. Cortes, Esquire



Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
Harrisburg, PA 17105-3265
EFILING - FILING DETAIL

Date Created	Filing Number
6/25/2021	2184341

Your filing has been electronically received. Upon review of the filing for conformity with the Commission's filing requirements, a notice will be issued acknowledging acceptance or rejection (with reason) of the filing. The matter will receive the attention of the Commission and you will be advised if any further action is required on your part.

The date filed on will be the current day if the filing occurs on a business day before or at 4:30 p.m. (EST). It will be the next business day if the filing occurs after 4:30 p.m. (EST) or on weekends or holidays.

Docket Number: C-2020-3023129

Case Description:

Transmission Date: 6/25/2021 2:42 PM

Filed On: 6/25/2021 2:42 PM

eFiling Confirmation Number: 2184341

File Name	Document Type	Upload Date
Filing Package - GRS COS for GRS Discovery Requests to Sunoco - Set IV.pdf	Certificate of Service	6/25/2021 2:42:15 PM

For filings exceeding 250 pages, the PUC is requiring that filers submit one paper copy to the Secretary's Bureau within three business days of submitting the electronic filing online. Please mail the paper copy along with copy of this confirmation page to Secretary, Pennsylvania Public Utility Commission, 400 North Street, Harrisburg PA 17120 a copy of the filing confirmation page or reference the filing confirmation number on the first page of the paper copy.

No paper submission is necessary for filings under 250 pages.

You can view a record of this filing and previous filings you have submitted to the PUC by using the links in the Filings menu at the top of the page. Filings that have been submitted within the last 30 days can be viewed by using the Recent Filings link. Older filings can be viewed by using the search options available in the Filing History link.

**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.	:	

**GLEN RIDDLE STATION, L.P.’S INTERROGATORIES AND REQUEST
FOR DOCUMENTS DIRECTED TO SUNOCO PIPELINE L.P. – SET IV**

Pursuant to 66 Pa. C.S. § 333 and 52 Pa. Code § 5.341, *et seq.*, Glen Riddle Station, L.P. (“Glen Riddle”), by and through the undersigned counsel, hereby propounds its Interrogatories and Request for Production of Documents upon Sunoco Pipeline L.P. (“Sunoco”) – Set IV.

DEFINITIONS

1. The “Responding Party,” “you,” or “your” means the party to which these interrogatories and requests for documents are propounded and/or all agents, affiliates, employees, consultants, and representatives acting on behalf of the Responding Party.
2. “Commission” means the Pennsylvania Public Utility Commission.
3. “Glen Riddle” means Glen Riddle Station, L.P.
4. “Sunoco” means Sunoco Pipeline L.P., including, but not limited to, all other persons and/or entities acting for or on behalf of it (e.g., Energy Transfer Partners and Duane Morris LLP).
5. “Property” means Glen Riddle Station Apartments in Middletown Township, Delaware County, Pennsylvania, Tax Parcel ID No. 27-00-00780-00.
6. “Township” means Middletown Township, Delaware County including, but not limited to, all other persons and/or entities acting for or on behalf of it.

7. “Pipeline Project” means Sunoco’s Mariner East 2 pipeline project including, without limitation, Sunoco’s work at the Property.

8. To “identify” a natural person means to state that person’s full name, title or position, employers, last known address, and last known telephone number.

9. To “identify” a business entity means to state the full name of such business, the form of the business, and its location or address.

10. To “identify” a “document” means to provide all of the following information irrespective of whether the document is deemed privileged or subject to any claim of privilege:

- A. The title or other means of identification of each such document;
- B. The date of each such document;
- C. The author, preparer or signer of each such document; and

D. A description of the subject matter of such document sufficient to permit an understanding of its contents and importance to the testimony or position being examined and the present or last known location of the document. The specific nature of the document should also be stated (e.g., letter, business record, memorandum, computer print-out, etc.).

In lieu of “identifying” any document, it shall be deemed a sufficient compliance with these interrogatories to attach a copy of each such document to the answers hereto and reference said document to the particular interrogatory to which the document is responsive.

11. “Document” means the original and all drafts of all written and graphic matter, however produced or reproduced, of any kind or description, whether or not sent or received, and all copies thereof which are different in any way from the original (whether by interlineation, date-stamp, notarization, indication of copies sent or received, or otherwise), including without limitation, any paper, book, account, photograph, blueprint, drawing, sketch, schematic,

agreement, contract, memorandum, press release, circular, advertising material, correspondence, letter, telegram, telex, object, report, opinion, investigation, record, transcript, hearing, meeting, study, notation, working paper, summary, intra-office communication, diary, chart, minutes, index sheet, computer software, computer-generated records or files, however stored, check, check stub, delivery ticket, bill of lading, invoice, record or recording or summary of any telephone or other conversation, or of any interview or of any conference, or any other written, recorded, transcribed, punched, taped, filmed, or graphic matter of which the Responding Party has or has had possession, custody or control, or of which the Responding Party has knowledge.

12. “Communication” means any manner or form of information or message transmission, however produced or reproduced, whether as a document as herein defined, or orally or otherwise, which is made, distributed, or circulated between or among persons, or data storage or processing units.

13. “Date” means the exact day, month, and year, if ascertainable, or if not, the best approximation thereof.

14. “Person” refers to, without limiting the generality of its meaning, every natural person, agent, broker, consultant, corporation, partnership, association (whether formally organized or ad hoc), joint venture, unit operation, cooperative, municipality, commission, governmental body or agency, or any other group or organization.

INSTRUCTIONS

1. Items referred to in the singular include those in the plural, and items referred to in the plural include those in the singular.

2. Items referred to in the masculine include those in the feminine, and items referred to in the feminine include those in the masculine.

3. The answers provided should first restate the question asked and identify the person(s) supplying the information.

4. In answering the interrogatories, the Responding Party is requested to furnish all information that is available to the Responding Party, including information in the possession of the Responding Party's attorneys, agents, consultants, or investigators, and not merely such information of the Responding Party's own knowledge. If any of the interrogatories cannot be answered in full after exercising due diligence to secure the requested information, please so state and answer to the extent possible, specifying the Responding Party's inability to answer the remainder, and stating whatever information the Responding Party has concerning the unanswered portions. If the Responding Party's answer is qualified in any particular, please set forth the details of such qualification.

5. If the Responding Party objects to providing any document requested on any ground, identify such document by describing it as set forth in these instructions and definitions and state the basis of the objection.

6. If the Responding Party objects to part of an interrogatory and refuses to answer that part, state the Responding Party's objection and answer the remaining portion of that interrogatory. If the Responding Party objects to the scope or time period of an interrogatory and refuses to answer for that scope or time period, state the Responding Party's objection and answer the interrogatory for the scope or time period that the Responding Party believes is appropriate.

7. If, in connection with an interrogatory, the Responding Party contends that any information, otherwise subject to discovery, is covered by either the attorney-client privilege, the so-called "attorneys' work product doctrine," or any other privilege or doctrine, then specify the general subject matter of the information and the basis to support each such objection.

8. If any information is withheld on grounds of privilege or other protection from disclosure, provide the following information: (a) every person to whom such information has been communicated and from whom such information has learned; (b) the nature and subject matter of the information; and, (c) the basis on which the privilege or other protection from disclosure is claimed.

9. The interrogatories are continuing and the Responding Party is obliged to change, supplement and correct all answers given to conform to new or changing information.

10. The Responding Party should include a verification in accordance with 52 Pa. Code § 1.36.

INTERROGATORIES FROM GLEN RIDDLE TO SUNOCO – SET IV

1. Identify all communications by and between Sunoco and Aqua America, Inc. (“Aqua”), or anyone acting on behalf of Aqua , regarding the water line break that occurred within Sunoco’s work area on the Property on May 26, 2021 (the “Water Line Break”), including, without limitation, communications regarding the water.

2. Identify all communications by and between Sunoco and the Township regarding the Water Line Break, including, without limitation, communications regarding the water.

3. Identify all communications by and between Sunoco and any consultant or expert or service provider regarding the Water Line Break, including, without limitation, communications regarding the water.

4. Please identify the following regarding any pipeline owned or operated by Sunoco on the Property other than the pipeline associated with the Pipeline Project:

- a. When the pipeline was last used to transport any substance;
- b. The substance(s) transported, if any; and

- c. All communications with Glen Riddle pertaining to the operation of the pipeline(s).
- 5. Identify all communications by and between Sunoco and the Pennsylvania State Police relating in any way to the Property.
- 6. Describe all work done by or on behalf of Sunoco to any line or pipe within Sunoco's work space on the Property from May 26, 2021, to the present.
- 7. Describe any repair performed on the water line associated with the Water Line Break on the Property, including, without limitation, the following:
 - a. The details of the specific repair performed;
 - b. The names of all entities and individuals associated with the repair; and
 - c. Any warranties associated with the repair.
- 8. Describe the means, if any, by which Sunoco secured all of the existing lines or pipes on the Property to protect them within Sunoco's workspace during the work on the Pipeline.
- 9. Identify any business relationship by and between Sunoco or Energy Transfer Partners, on one hand, and Aqua, on the other hand.
- 10. Identify all payments of money made by Sunoco or its affiliates to the Township from January 1, 2018, through the present.

**REQUEST FOR PRODUCTION OF
DOCUMENTS FROM GLEN RIDDLE TO SUNOCO – SET 4**

- 1. All documents relating to any of the foregoing interrogatory responses.

RESPONSE: