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March 18, 2022

via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Filing Room
Harrisburg, PA 17120

Re: *Meghan Flynn et al. v. Sunoco Pipeline L.P.*
Consolidated Docket Nos. C-2018-3006116, C-2018-3003605, C-2018-3005025,
C-2019-3006898, and C-2019-3006905
November 18, 2021 Order – Paragraph 21 Compliance Filing

Dear Secretary Chiavetta:

Pursuant to the Pennsylvania Public Utility Commission's November 18, 2021 Order, Sunoco Pipeline L.P. submits the attached compliance filing in accordance with Paragraph 21 of the Order.

Respectfully submitted,

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Enclosure

Rosemary Chiavetta, Secretary
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the forgoing document upon the persons listed below in accordance with the requirements of § 1.54 (relating to service by a party).

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Dated: March 18, 2022

SUNOCO PIPELINE L.P.

**PLAN TO ENHANCE PUBLIC AWARENESS AND
EMERGENCY RESPONSE**

PURSUANT TO

***Flynn et al v. Sunoco Pipeline L.P.*, Docket Nos.
C-2018-3006116 *et al*, Opinion and Order at ¶ 21
(Opinion and Order entered Nov. 18, 2021)**

MARCH 18, 2022

INTRODUCTION AND BACKGROUND

On November 18, 2021, the Commission entered a final Opinion and Order in the consolidated action *Meghan Flynn et al. v. Sunoco Pipeline L.P.*, Docket Nos. C-2018-3006116, C-2018-3003605, C-2018-3005025, C-2019-3006898, and C-2019-3006905 (the “Order”), which set forth certain submissions that Sunoco Pipeline L.P. (“SPLP”) must provide to the Commission on identified schedules.¹ Paragraph 21 of the Order states as follows:

21. That within one hundred twenty (120) days of Final entry of this Opinion and Order, Sunoco Pipeline, L.P. shall file with the Commission with a copy to the Bureau of Technical Utility Services for review a written plan to enhance its public awareness and emergency notification plans, including but not limited to addressing: a) direct notifications to municipalities, counties, and School Districts in high consequence areas of any leak, breach or other pipeline emergency; b) supplemental program enhancements to emergency training programs; c) plan to internal or external audits to evaluate the effectiveness of its programs; and d) corrective action plans to address any insufficiencies or weaknesses revealed through its evaluations and audits, and that a copy of the plan shall be served upon the Commission’s Bureau of Technical Utility Services and Bureau of Investigation and Enforcement.

SPLP provides the following description of the company’s efforts to enhance its public awareness program and emergency response and notification plans in accordance with the requirements of Paragraph 21 of the Order, for locations in Chester and Delaware Counties related to the Mariner East 1 pipeline, the 12-inch pipeline, the Mariner East 2 pipeline, and the Mariner East 2X pipeline (collectively herein, the “Mariner East Pipeline System”).

¹ SPLP has appealed the Order to the Pennsylvania Commonwealth Court, *Sunoco Pipeline L.P. v. Pennsylvania Public Utility Commission*, Dkt. Nos. 1415 C.D. 2021, 1416 C.D. 2021, 1417 C.D. 2021, 1418 C.D. 2021, 1419 C.D. 2021, 1421 C.D. 2021. SPLP has not sought to supersede or otherwise suspend the compliance requirements of the Order during the pendency of the appeal, and therefore is making this compliance submission in accordance with the deadlines established by the Order; however, this compliance submission shall in no way be construed as a waiver by SPLP of the legal and factual challenges to the Order as set forth in the appeal and related pleadings.

Paragraph 21 – Overview of Enhanced Public Awareness for Chester and Delaware Counties

In accordance with Section 195.440 of PHMSA’s regulations, SPLP has developed and implements a Public Awareness Plan, which is outlined in SPLP’s standard operating procedure (“SOP”) HLA.17 – Public Awareness Plan and HLI.40 – Communication with API RP1162-defined Stakeholders. SPLP’s Public Awareness Plan includes, among other things, periodic communications to affected members of the public, excavators, local public officials, and local emergency responders. SPLP also provides detailed annual training for emergency response personnel and excavators operating in communities where SPLP’s pipelines and related facilities are located, including for the Mariner East Pipeline System.

In accordance with SPLP’s Public Awareness Plan, SPLP sends direct mailings to members of the public in the communities where its pipelines and related facilities are located. These direct mailings include two detailed brochures: one which is titled “*Facts about Pipeline Safety in Your Community*,”² that was developed for the affected public and excavator audiences and is sent annually to excavators and every two years to the affected public; and a second titled “*Are You Prepared to Respond to a Pipeline Emergency*,”³ that was developed for the emergency responder and public official audiences and is sent annually to emergency responders and to public officials. The frequency of these stakeholder mailings meets or exceeds the requirements of API RP 1162 – Public Awareness Programs for Pipeline Operators, First Edition.

² Current copy available on Energy Transfer’s website, at https://cms.energytransfer.com/wp-content/uploads/2021/09/PublicAwareness_AffectedPublic_2021.pdf

³ Current copy available on Energy Transfer’s website at https://cms.energytransfer.com/wp-content/uploads/2021/09/PublicAwariness_EmergResponders_2021.pdf

These detailed direct mailers are updated periodically, and the “*Facts about Pipeline Safety in Your Community*” is printed in both English and Spanish. The mailers provide information regarding various important topics, including:

- Pipeline safety procedures
- How to use the 811 One-Call system and related procedures
- How to identify the location of a pipeline
- How to recognize a pipeline leak by sight, sound, and smell
- What to do and not to do in the event a leak were to occur
- What SPLP does if a leak occurs
- A summary of SPLP’s safety and integrity management procedures
- What to do if there is damage or disturbance of a pipeline
- Information on right-of-way
- Information on publicly-available pipeline mapping systems
- Contact information (phone numbers) for emergency and non-emergency events and inquiries
- Links to websites with additional information

SPLP, through its parent company Energy Transfer, also maintains a public awareness website, where members of the public can obtain direct information regarding pipeline safety, at <https://www.energytransfer.com/public-awareness/>.

In accordance with Paragraphs 9 and 10 of the Order, SPLP is in the process of developing new versions of its public awareness direct mailing brochures to include the additional language listed in Paragraphs 9 and 10 of the Order. The next periodic distribution of the public awareness direct mailing brochures throughout the Commonwealth, including Chester and Delaware Counties, is scheduled to occur in September 2022, and will include the additional language identified in Paragraphs 9 and 10 of the Order.

SPLP currently mails these public awareness brochures to all members of the public located in proximity to the Mariner East Pipeline System. PHMSA regulations require a minimum 660-foot recommended buffer zone for distribution of the mailings that is recommend by American Petroleum Institute's (API) Recommended Practice (RP) 1162, which is incorporated by reference

into 49 C.F.R. 195.440(c). SPLP's public awareness program goes significantly beyond this minimum requirement.

In the prior most recent mailings that were sent in 2021, SPLP mailed 49,535 total brochures in the Commonwealth of Pennsylvania to excavators and emergency responders, including 2,890 individual mailings to Chester County, and 3,035 individual mailings to Delaware County. In the fall of 2020, when all stakeholder groups were mailed pipeline safety information, almost 300,000 brochures were sent in the Commonwealth of Pennsylvania (299,984 total), including 76,659 to Chester County and Delaware County stakeholders. The total number of brochures sent to each stakeholder group in Chester and Delaware Counties in 2020 were:

- 70,063 Affected Public
- 396 Emergency Officials
- 5,631 Excavators
- 569 Public Officials

For the upcoming mailing scheduled to occur in September 2022, SPLP expects that it will distribute approximately 39,000 individual mailings to Chester County and 36,000 individual mailings to Delaware County. SPLP maintains, and will continue to maintain, a comprehensive database that documents all the mailings that are sent for its pipeline systems, including the Mariner East Pipeline System in Chester and Delaware Counties.

In addition, through SPLP's public affairs and community relations department, the company routinely interacts directly with municipalities, school districts, and emergency response/management professionals in Chester and Delaware Counties on a daily, weekly, and monthly basis. Joseph McGinn, Vice President of Public and Government Affairs for Energy Transfer Partners, leads a team of 6 employees who are dedicated to maintaining direct contact with government officials and local representatives, providing individuals and entities with updates regarding the Mariner East Pipeline System and other assets operating in their

communities, fielding and answering questions regarding the pipelines and projects, and providing a central point of contact between the community and the company for any needs that might arise.

In Chester and Delaware Counties in particular, for any event that impacts a municipality or its residents, or that is scheduled to occur, SPLP engages in a series of direct, personal communications (face-to-face, electronic, telephonic, etc.), with relevant local and County public and emergency officials, and direct communications sent to local residents. SPLP has kept, and will continue to keep, these municipal and County officials and representatives, school districts, emergency response/management professionals, and elected representatives informed of locations of scheduled operations and maintenance work, and construction activities. SPLP participates in bi-weekly meetings with townships across Chester and Delaware Counties regarding pipeline construction and operations activities. SPLP also regularly attends and participates in the Chester County Association of Township Officials monthly meetings, which are attended by township officials, state representatives, state senators, the Commission, the Pennsylvania Department of Environmental Protection (“PADEP”), and others – during which SPLP provides updates on projects and answers questions that may arise.

In addition, in the summer/fall of 2020, SPLP launched a new series of social media platforms and websites to provide the public with additional access to pipeline safety information. This included a specific additional website aimed at providing the public with pipeline safety information, which can be found at: <https://www.papipelinesafety.com/>. SPLP has also developed specific pipeline safety Instagram⁴ and Facebook⁵ accounts that also provide an additional enhancement to its public awareness plan. Through these additional online media platforms, SPLP

⁴ Available at: <https://www.instagram.com/papipelinesafety/?hl=en>

⁵ Available at: <https://www.facebook.com/PApipelineSafety/>

provides multiple avenues for public awareness and pipeline safety information to the public. The online media serves as an additional enhancement of the company's public awareness plan.

SPLP also communicates with stakeholders and proactively shares important pipeline safety information through billboards, television, and radio advertisements that provide the public with additional information regarding the Mariner East Pipeline System, and directions to where a member of the public could obtain additional information on pipeline safety and emergency response.

Further, in accordance with paragraph 17 of the Order, SPLP has engaged, and will continue to engage, in direct outreach and contact with municipalities in Chester and Delaware Counties, and with representatives from Delaware and Chester Counties if and when there has been excavation on the Mariner East Pipeline System in a respective area. The process for enhanced and continued direct communications with municipalities, counties, school districts, and emergency response representatives in Chester and Delaware Counties will also be continued to be enhanced as part of the company's ongoing efforts to satisfy the requirements of Paragraph 18 of the Order, as more fully described below.

Paragraph 21(a) – Direct Notifications to Municipalities, Counties & School Districts in High Consequence Areas of Chester and Delaware Counties of Leak, Breach, or Other Pipeline Emergency

SPLP maintains SOPs for hazardous liquids pipelines, including the Mariner East Pipeline System that establish specific emergency response procedures consistent with federal and state law, which include plans that address communications and coordination for reporting and responding to a release from a pipeline or related facility. These include SOPs related to the following topics and issues: SOP HLA.04 - Initial Reporting and Investigating Events; SOP HLA.08 - Field Emergency Response Procedures; SOP HLA.15 - PHMSA/State Accident

Reporting; SOP HLA.19 - Area Emergency Response Plan Development Maintenance; SOP CRM.11 - Emergency Response Procedures.

In addition to these SOPs, and other applicable SOPs, SPLP implements a Control Center Incoming Call Procedure that provides specific guidance for handling incoming phone calls, and in particular, procedures related to reports of potential releases from the pipelines or other facilities. SPLP also utilizes a Spill Notification and Response Flowchart that serves as a quick reference and summary of emergency response protocols in the event of a release. This flowchart also identifies when local emergency responders will be contacted in the event of a release. SPLP also maintains a detailed Facility Response Plan for the Philadelphia District, which addresses emergency response procedures for SPLP's facilities in Delaware and Chester County. Consistent with 66 Pa. C.S. § 1512, upon request SPLP has and will provide its emergency response plan to county emergency management directors pursuant to the restrictions and provisions of the statute. Copies of SPLP's SOPs and other related to emergency procedures, communications, coordination, reporting, and responding documents have been previously provided to the Commission.

In addition, upon completion of the commissioning of the Mariner East 2/2X pipelines in Chester and Delaware Counties, SPLP will implement updates to its emergency response procedures and plans to incorporate the new operating pipelines and related facilities into those plans.

As part of that ongoing process, and in accordance with Paragraph 16 of the Order, SPLP is currently in the process of updating the contact lists utilized by SPLP's control center and emergency response teams in Chester and Delaware Counties to also include municipal police departments and school districts located where the Mariner East Pipeline System is operating, so

that in the event of a leak or rupture on the Mariner East Pipeline System where the 911 center is notified, the municipal police departments and school districts will be directly notified by either SPLP, SPLP’s control center, or a company representative on the Incident Command Team. For Delaware County, this updated contact list will include contact information for the Principal of Glenwood Elementary School,⁶ or his or her designee.

The identification of the particular individuals for each of the counties, municipalities, and school districts is also part of SPLP’s ongoing outreach and coordination efforts in accordance with Paragraph 18 of the Order, to work cooperatively with the Chester County Commissioners, Delaware County Council, and the municipalities where the Mariner East Pipeline System is operating to arrange for meetings to establish emergency contact lists as identified in Paragraph 18(a) of the Order. To that end, as of December 18, 2021, SPLP had made outreach to the following entities and entities and individuals:

Chester County			
Township	Contact	Title	Outreach Date
West Nantmeal	Deborah Kolpak	Secretary / Open Records Office	12/17/2021
East Nantmeal	Susan Rutherford	Secretary / Open Records Office	12/17/2021
Wallace	Betty Randzin	Secretary / Manager	12/17/2021
Upper Uwchlan	Tony Scheivert	Manager	12/17/2021
Uwchlan	Scott Greenley	Manager	12/17/2021
West Whiteland	Mimi Gleason	Manager	12/17/2021
East Goshen	Derek Davis	Manager	12/17/2021
West Goshen	Casey LaLonde	Manager	12/17/2021
County Commissioners	Marian Moskowitz	Chair of Board of Commissioners	12/18/2021
	Josh Maxwell	Vice Chair	12/18/2021
	Michelle Kichline	Commissioner	12/18/2021
Delaware County			
Township	Contact	Title	Outreach Date
Westtown	Jon Altshul	Manager	12/17/2021
Thornbury	Jeff Seagraves	Manager	12/17/2021
Edgmont	Neil Vaughn	Manager	12/17/2021

⁶ Glenwood Elementary School is in the Rose Tree Medial School District.

Middletown	John McMullan	Manager	12/17/2021
Aston	Kelly Pippin	Secretary	12/17/2021
Upper Chichester	George Needles	Manager	12/17/2021
Lower Chichester	Joseph Possenti	Secretary	12/17/2021
Marcus Hook	Andrew Weldon	Manager	12/17/2021
Chester	Debra Zimmerman	Manager	12/17/2021
Brookhaven	George Pappas	Councilman	12/17/2021
County Council	Brian Zidek	Chairman	12/18/2021
	Deborah Cairy	Secretary	12/18/2021
	Monica Taylor	Vice Chair	12/18/2021
	Kevin Madden	Councilman	12/18/2021
	Elaine Schaefer	Council	12/18/2021
	Christine Reuther	Council	12/18/2021
School Districts			
School District	Name	Title	Outreach Date
West Chester Area School District	Bob Sokolowski	Superintendent	12/17/2021
Twin Valley School District	Rita Haddock	Board Secretary	12/17/2021
Downingtown Area School District	Jane Bertone	President	12/17/2021
Rose Tree Media School District	Eleanor DiMarino-Linnen	Superintendent	12/17/2021

SPLP is in the process of scheduling meetings with representatives from each of the counties, municipalities, and school districts listed above. As of the date of this submission, SPLP has scheduled four (4) meetings with county, municipal, and school district entities above, and is in the process of scheduling additional meetings. Based on the outcomes of these meetings, SPLP will update its emergency contact lists if and as necessary.

Paragraph 21(b) – Supplemental Program Enhancements to Emergency Training Programs

In accordance with SPLP’s public awareness plan, SPLP offers annual liaison meetings to emergency responders in the communities where the company’s pipeline systems operate, including Chester and Delaware Counties. These trainings include the Coordinated Response Exercise for First Responders (“CoRE”) to local emergency responders, excavators and public

officials throughout Pennsylvania, and is coordinated by SPLP with other pipeline operators in the Commonwealth. Additional information on the CoRE program is available at the following website: https://pa.pipeline-awareness.com/core_and_hseep_information/. A component of the CoRE training is the CoRE Emergency Response Manual that is developed for and provided during the training to emergency response organizations. The primary objective of CoRE is the opportunity for pipeline operators and first responders to collaborate and pre-plan for a pipeline emergency response. Each CoRE training includes a local pipeline incident scenario that allows responders and pipeline personnel to interact and talk through resources and capabilities. SPLP coordinates with other pipeline operators to hold annual in-person CoRE liaison meetings in a table-top exercise. In 2021, SPLP offered 23 CoRE training sessions in the Commonwealth that were attended by 217 emergency responders. Invitations were sent to 897 emergency organizations and public officials in Chester and Delaware Counties, and to 6,112 excavation companies in those counties. Forty-three (43) emergency responders, representing almost two dozen emergency organizations, attended the September 14, 2021 CoRE session. Attached as “**Appendix A**” is list of the attending agencies at the September 14, 2021 CoRE session from Chester and Delaware Counties. Of note, several representatives of the Chester County Department of Emergency Services and also the Delaware County Department of Emergency Services attended the September 14, 2021 CoRE session.

SPLP is committed to continuing our annual liaison outreach efforts to these crucial stakeholders. The next CoRE training that will be sponsored by SPLP and other pipeline operators is scheduled for August 2022. SPLP will invite emergency responders, public officials, schools, and excavators in Chester and Delaware Counties to attend the 2022 CoRE training.

In addition, SPLP has created the Mariner East Responder Outreach (“MERO”) training, which is an enhanced periodic emergency response training program that SPLP offers to emergency responders and public officials in communities where the Mariner East Pipeline System operates. The MERO training focuses on pipeline awareness, location of pipelines and emergency facilities, the National Pipeline Mapping System, characteristics of the products contained in pipelines, and emergency response procedures, including release recognition, communication and unified command, and guidance for suggested emergency response. The MERO training began in 2013 for Mariner West and was expanded in 2014 for the Mariner East Pipeline System. MERO trainings are coordinated with local and county emergency management/ emergency services offices where the pipelines operate. Over the last nine (9) years, 2,519 emergency responders from Pennsylvania have received training specific to the Mariner Pipeline Systems, including 333 emergency responders from Chester County, and 105 from Delaware County. SPLP is committing to continuing to offer the MERO training program for local emergency responders in the coming years.

SPLP also participates in tabletop trainings, open houses, and offers tours of SPLP’s facilities for emergency responders. Over the last five years, these specialized trainings and tours have included the following:

- 3/23/2017 – Tours of the pipeline control center and facilities in Montello, Berks County, PA for Director Tim Boyce of the Delaware County Department of Emergency Services and several representatives from his department.
- 5/18/2018 – A team from SPLP participated in the Pipeline Emergency Preparedness & Training Tabletop Exercise that Chester County Department of Emergency Services (Chester DES) hosted. The exercise included the Chester County DES, Chester County Hazardous Materials Team (Chester Hazmat) and other response agencies.
- 5/29/2018 – Training at the Marcus Hook Industrial Complex (MHIC), which covered MHIC LPG and Process Unit Firefighting and had attendance from several Delaware

County response agencies, including the Lower Chichester Fire Company and the Marcus Hook Trainer Fire Department.

- 6/14/18 – SPLP held a training with 10 members of the Chester County Hazmat Team that focused specifically on SPLP’s control center operations in Montello, Pennsylvania, how SPLP implements its control center procedures, including leak detection warnings and procedures for emergency response dispatch.
- 11/10/2018 – An emergency response drill at the Marcus Hook Tank Farm in Aston, Delaware County, PA, that was attended by more than 20 responders from Delaware County emergency response agencies, including: Ogden Fire Company, Boothwyn Fire Company, Reliance Fire Company, Delaware County 911, Middletown Township Emergency Management Agency, and the Delaware County Department of Emergency Services. The drill tested SPLP and local responders for response to a simulated NGL pipeline release.
- 6/21/2019 – tour of Eagle Pump Station in Upper Uwchlan Township, Chester County, which included representatives from the Chester County Department of Emergency Services, the Commission, and several municipal officials from East Goshen Township, Upper Uwchlan Township and West Whiteland Township.
- 3/2/2022 – Energy Transfer operations personnel provided a tour of Boot Road Pump Station to West Goshen Township representatives. This included the West Goshen Township Engineer, three West Goshen Township Supervisors, the West Goshen Township Manager, and the West Goshen Township Emergency Management Coordinator.

SPLP will also continue its efforts related to public outreach by continuing the following activities and sponsorships:

- Major sponsor of the annual Pennsylvania One Call System, Inc. (PA 811) Safety Day conferences across Pennsylvania. “Safety Days” have become one of the largest safety conferences in the underground excavation and utility industry in North America and are held annually across the Commonwealth in several locations. The training features daylong education and hands-on opportunities for excavators and more than 2,000 excavators attended the sessions sponsored by SPLP in each of the past two years when it was last held in person in 2018 and 2019. Events are returning to in-person in 2022, and Energy Transfer/SPLP is a Silver Sponsor for these upcoming Safety Day events:
 - 5/17/2022 - Allentown, PA
 - 5/19/2022 - Drexel Hill, PA (Delaware County)
 - 6/7/2022 - Pittsburgh, PA
 - 6/16/2022 - York, PA
 - 8/11/2022 - Wilkes-Barre, PA

- 9/22/2022 - Altoona, PA
- SPLP, knowing the importance of having a voice in preventing damages to underground infrastructure, has had an elected representative serve on the board of directors of PA 811 for almost a decade.
- Sponsorship of the Common Ground Alliance (CGA) – The CGA is committed to saving lives and preventing damage to underground infrastructure by promoting effective damage prevention practices, including the use of calling 811 before any excavation is performed. It is the leading organization in North America seeking to reduce damages to underground facilities. SPLP is proud to sponsor the CGA at the silver level and has been a sponsor for several years

SPLP has also provided first responder grants to assist municipalities and emergency responders and has committed to continuing this program. Between 2016 and 2021, SPLP has provided first responder grants totaling over \$1,500,000, over \$900,000 of which went to recipients located in Chester and Delaware Counties. SPLP has also provided additional funding to emergency responders to allow them to attend emergency response training in Oklahoma. In late-2020 through 2022, SPLP also made additional offers to local municipalities and Chester and Delaware Counties to fund updates to local emergency response plans.

Paragraph 21(c) – Internal and External Audits to Evaluate Effectiveness of Public Awareness Plan and Emergency Training Programs

SPLP reviews its public awareness and emergency training programs in a variety of ways. SPLP performs an internal review annually, and also has a third-party conduct quantitative surveys no more than 4 years apart as part of the Public Awareness Program Effectiveness Research Survey (“PAPERS”).

PAPERS is a national industry-sponsored evaluation program developed and supported by the American Petroleum Institute (“API”), Association of Oil Pipelines (“AOPL”), and the Interstate Natural Gas Association of America (“INGAA”) and administered by a third-party research firm. This broad, industry-wide approach provides operators with meaningful,

comparable, consistent insight specific to their communications efforts related directly to their pipelines and was designed to meet the intent of the RP1162 regulatory requirements. Energy Transfer participated in the most recent survey, which was conducted in the Fall of 2021 and included SPLP assets in Pennsylvania.

The effectiveness of SPLP's public awareness program is evaluated on the PAPERS survey data. SPLP analyzes the data, using the following metrics, and develops an effectiveness measurement report:

1. Outreach: Are the messages reaching the intended stakeholders?
2. Level of knowledge: Are the messages being understood by the stakeholders?
3. Changes in behavior: Have the stakeholders learned the appropriate damage prevention behaviors?
4. Bottom-line results: Are the messages having an impact on the number of damages and the consequences of the damages?

SPLP is currently in the process of receiving the 2021 PAPERS survey data and will begin analysis once all data is received.

Consistent with API RP 1162, SPLP's annual, internal self-assessment considers program development, program implementation and documentation. It is conducted by an internal working group of three professionals with a combined experience in public awareness of more than 40 years and is directed by the Senior Manager for Public Awareness. The team thoroughly reviews each key element of the public awareness program – including stakeholder audiences, baseline and supplemental messages, communications materials, delivery frequencies and schedules, delivery methods, communications activities, and supplemental efforts – to ensure all elements were implemented, completed as required, ensuring compliance with regulatory requirements. Public awareness messages are reviewed annually to determine if content should be refined or enhanced. The need for supplemental plan enhancement or the development of new or additional communications materials are evaluated as well.

Pursuant to the Commission’s Order at Paragraph 23, an internal self-assessment of SPLP’s Public Awareness Plan for the year 2021 will be submitted on or before the deadline established by the Order.

Paragraph 21(c) – Corrective Action Plans to Address Any Insufficiencies or Weaknesses Revealed Through its Evaluations and Audits

An exhaustive analysis is undertaken of all completed stakeholder survey responses. Responses are grouped by audience and categorized into three key measurement areas – (1) knowledge; (2) outreach; and, (3) behavior. Populated survey responses are assessed using an established evaluation criterion, mandated by the company’s SOPs. Any deficiencies, i.e., those less than the acceptable threshold, require additional evaluation for future improvement. To the extent any of SPLP’s annual internal reviews or third-party quantitative surveys reflect any issues that are determined to require a corrective action, SPLP’s internal working group, which includes the Senior Manager for Public Awareness, will ensure that the appropriate corrective action is completed in compliance with all regulatory requirements.

CONCLUSION

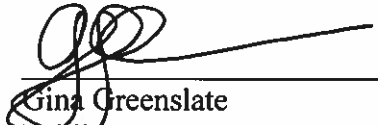
With the submission of this enclosed plan, SPLP has satisfied the requirements of Paragraph 21 of the Order.

*Appendix A: Attending Agencies at the September 14, 2021 CoRE Session
for Chester and Delaware Counties*

COUNTY/EMERGENCY ORGANIZATION	ATTENDEES
CHESTER COUNTY	19
CHESTER COUNTY DEPT OF EMERGENCY SERVICES - PSAP	3
CHESTER COUNTY EMA	2
CHESTER COUNTY EMERGENCY SVCS	8
CHESTER COUNTY LEPC	1
GOODWILL FIRE COMPANY 2	1
GOSHEN FIRE COMPANY STATION 54	1
UWCHLAN TWP POLICE DEPT	1
WEST GOSHEN EMERGENCY SVCS	2
DELAWARE COUNTY	24
BRIARCLIFFE FIRE DEPT	2
BROOKHAVEN EMA	1
CONCORD TWP EMERGENCY SVCS	1
DELAWARE COUNTY EMERGENCY SVCS	1
DELAWARE COUNTY LEPC	1
EDGMONT FIRE COMPANY 1 STATION 64	8
MIDDLETOWN FIRE COMPANY 1	2
MIDDLETOWN TWP EMA	1
NEWTOWN SQUARE FIRE COMPANY 1	1
OGDEN FIRE COMPANY 1	1
RELIANCE HOOK & LADDER COMPANY	1
RIDDLE PARAMEDICS	2
SOUTH MEDIA FIRE COMPANY 1	1
UPPER CHICHESTER TWP EMA	1
Grand Total	43

VERIFICATION

I, Gina Greenslate, on behalf of Sunoco Pipeline L.P. hereby state that the facts set forth in the foregoing documents 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 in this matter. This verification is made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

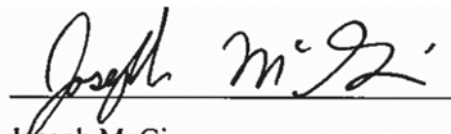


Gina Greenslate
Public Awareness Manager
Energy Transfer

Dated: March 18, 2021

VERIFICATION

I, Joseph McGinn, on behalf of Sunoco Pipeline L.P., hereby state that the facts set forth in the foregoing documents 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 in this matter. This verification is made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

A handwritten signature in black ink, appearing to read "Joseph McGinn", is written over a horizontal line.

Joseph McGinn
Vice President of Public and Government Affairs
Energy Transfer

Dated: March 18, 2021

VERIFICATION

I, C. Gus Borkland, on behalf of Sunoco Pipeline L.P., hereby state that the facts set forth in the foregoing documents 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 in this matter. This verification is made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.



C. Gus Borkland
Vice President, Environmental Projects &
Emergency Planning/Remediation
Energy Transfer

Dated: March 18, 2021