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October 4, 2024

VIA ELECTRONIC FILING

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

In re: Application of Sunoco Pipeline L.P. for: (1) Issuance of a Certificate of Public Convenience Authorizing the Abandonment of a Portion of Its Petroleum Products Pipeline Transportation Service within Pennsylvania From Salem, Chelsea, and Twin Oaks to Willow Grove (Refined Products); and (2) All Other Approvals or Certificates Necessary or Appropriate Under the Public Utility Code; Docket No. A-2024-_____ (**PUBLIC VERSION**)

Dear Secretary Chiavetta:

Attached for filing with the Pennsylvania Public Utility Commission is the Application of Sunoco Pipeline L.P. ("SPLP") for a Certificate of Public Convenience Authorizing the Abandonment of a Portion of Its Petroleum Products Pipeline Transportation Service. A copy of the Confidential Materials (Exhibit C) associated with this filing will be filed via overnight delivery.

Very truly yours,

/s/ Whitney E. Snyder

Whitney E. Snyder
Thomas J. Sniscak

WES/
Enclosures

cc: Per Certificate of Service

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Sunoco Pipeline L.P. for: (1) :
Issuance of a Certificate of Public :
Convenience Authorizing the Abandonment :
of a Portion of Its Petroleum Products :
Pipeline Transportation Service within :
Pennsylvania From Salem, Chelsea, and :
Twin Oaks to Willow Grove (Refined :
Products); and (2) All Other Approvals or : Docket No. A-2024-_____ :
Certificates Necessary or Appropriate :
Under the Public Utility Code :
: :
: :
: :
: :

**APPLICATION OF SUNOCO PIPELINE L.P. FOR: (1) ISSUANCE OF A
CERTIFICATE OF PUBLIC CONVENIENCE AUTHORIZING THE
ABANDONMENT OF A PORTION OF ITS PETROLEUM PRODUCTS PIPELINE
TRANSPORTATION SERVICE WITHIN PENNSYLVANIA FROM SALEM,
CHELSEA, AND TWIN OAKS TO WILLOW GROVE (REFINED PRODUCTS); AND
(2) ALL OTHER APPROVALS OR CERTIFICATES NECESSARY OR
APPROPRIATE UNDER THE PUBLIC UTILITY CODE**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to 66 Pa. C.S. §§ 1102(a)(2) and 1103(a), Sunoco Pipeline L.P. (SPLP) respectfully requests the Pennsylvania Public Utility Commission (“PUC” or “Commission”) issue a certificate of public convenience authorizing the proposed abandonment of Willow Grove as a destination point within SPLP’s tariff for refined product deliveries as described more specifically below for SPLP’s intrastate petroleum products pipeline transportation service in Pennsylvania. No shipments have been delivered to Willow Grove in approximately 13 years and the only shipper

that utilized Willow Grove as a destination point in the recent past was Sunoco L.P. (SUN).¹ A letter of non-opposition from Sunoco L.P. is attached hereto.

I. INTRODUCTION

1. This Application requests approval of abandonment of a portion of refined product pipeline transportation service that is no longer in use. Specifically, SPLP seeks to abandon one destination point listed in its tariff, Willow Grove. Given the complete lack of utilization of Willow Grove for deliveries by shippers in the past approximately 13 years, SPLP no longer receives revenues previously generated from providing service relative to this destination point. Moreover, in the most recent past, the only shipper was SUN. SPLP can affirmatively state there is no prospect of future use of this point. Also, there is no harm to the public in abandoning service to a destination point that has not been utilized in 13 years. Abandonment is clearly in the public interest under the Commission's four-part abandonment test as explained below.

2. SPLP has included with this Application a non-opposition letter from SUN, the only shipper to utilize Willow Grove for deliveries in the recent past (approximately 13 years ago). SPLP has also served SUN with this Application.

II. DESCRIPTION OF APPLICANT

3. Pursuant to authority granted by this Commission and by the Federal Energy Regulatory Commission ("FERC"), SPLP currently operates pipelines that transport petroleum products, including refined products such as gasoline and fuel oils, and natural gas liquids, including propane, ethane, and butane, in intrastate and interstate service. SPLP provides intrastate transportation service between points in Pennsylvania pursuant to the rates set forth in its Tariff Pipeline-Pa. P.U.C. No. 16, Supplement 9.

¹ Sunoco L.P. is a different entity than the Applicant Sunoco Pipeline L.P.

4. All correspondence and communication regarding this Application should be directed to counsel for SPLP:

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Thomas J. Sniscak, Esquire
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III. DESCRIPTION OF PROPOSED ABANDONMENT

5. SPLP seeks to abandon one specific delivery point, Willow Grove, within its tariff. This point has not been used for delivery of products since 2011 and the only shipper to this destination in the recent past is SUN. The last delivery to Willow Grove was on or about December 12, 2011. The products transported to Willow Grove included heating oil and gasoline.

6. A map showing the destination point is attached as **Exhibit A**.

7. A redline and proforma tariff supplement removing the above point and associated rates is attached as **Exhibit B**.

IV. LOST REVENUE RELATED TO PROPOSED ABANDONMENT

8. **Exhibit C** to this Application shows the final year revenue for Willow Grove.²

9. Given the complete lack of use and revenue generated by Willow Grove in the past approximately 13 years, continued service at this point is clearly uneconomic. Presently, SPLP has no reasonable forward-looking expectation of use or earning revenues sufficient to support continued service to Willow Grove.

² Specific and total volumes and associated revenues have been redacted from the public version of Exhibit C, but are available in the CONFIDENTIAL version of Exhibit C.

V. IMPACTS OF PROPOSED ABANDONMENT ON CUSTOMERS

10. The proposed abandonment will have no adverse effects on customers because there are no customers. No entity has used this point in approximately 13 years, and the only shipper in the most recent past was SUN.

11. SUN has confirmed non-opposition to the proposed abandonment, as shown in the letter contained in **Exhibit D**.

VI. LEGAL STANDARDS

12. The Public Utility Code requires Commission approval via a certificate of public convenience for the abandonment of public utility service. 66 Pa. C.S. § 1102(a).

13. To obtain approval for the proposed abandonment, SPLP must show the proposed abandonment “is necessary or proper for the service, accommodation, convenience, or safety of the public,” i.e., that the proposed abandonment is in the public interest. 66 Pa. C.S. § 1103(a).

14. In 2016, the Commission clarified the standard for a pipeline to partially abandon service is a four-factor test including: (a) the extent of the loss to the utility; (b) the prospects of the system being used in the future; (c) balancing of the utility’s loss with the hardship on the public; and (d) the availability of alternative service. *Application of Laurel Pipe Line Company L.P.*, Docket Nos. A-2016-2575829 *et al.*, Opinion and Order at 51-111 (Order entered July 12, 2018).

15. This is not a strict standard of review, but these factors envelop the considerations examined in numerous prior decisions addressing public utilities’ abandonment of service. *Id.* at 51-53.

16. Moreover, the Commission must weigh the above factors and not focus on specific cost-benefit criteria. *Borough of Duncannon v. Pa. Pub. Util. Comm'n*, 713 A.2d 737, 740 (Pa.

Cmwlth. 1998). Once substantial evidence is provided to fulfill the multi-factor test, the Commission can approve issuance of a certificate of public convenience for abandonment of utility service. *Id.*

VII. THE PROPOSED ABANDONMENT IS IN THE PUBLIC INTEREST

17. All four abandonment factors weigh completely in favor of granting the Application, as detailed below. This is because the point proposed to be abandoned has not been used in approximately 13 years, so there is a complete loss of revenue, no prospects of the point being used in the future, no harm to the public, and, to the extent alternatives are relevant, multiple alternatives exist.

18. Moreover, granting this application is fully consistent with prior Commission orders regarding SPLP's pipeline service, where even when abandoned or suspended portions of pipelines were being utilized at the time of requested abandonment, abandonment was granted. *E.g., Application of Sunoco Pipeline, L.P.*, Docket Nos. A-2013-2371789, P-2013-2371775 (Order entered August 29, 2013).

A. THE EXTENT OF THE LOSS TO THE UTILITY

19. The first factor, extent of the loss to the utility, focuses on the loss to utility operations and whether a rate increase would cure the utility's loss.

20. Here the extent of the loss to the utility is clear – there have been no revenues generated from transportation at the point proposed to be abandoned for the past approximately 13 years. No examination of associated expenses is needed as any associated expenses are a further loss given the complete lack of revenue. To state the obvious, no rate increase can cure this loss. Lost revenues are detailed in Exhibit C (Confidential Version).

21. The first factor thus weighs completely in favor of granting the Application and allowing abandonment.

B. THE PROSPECTS OF THE SYSTEM BEING USED IN THE FUTURE

22. The second factor, prospects of the system being used in the future, also very clearly weighs in favor of granting the Application and allowing abandonment.

23. Given the most recent shipper for this tariff point in the most recent past is SUN, SPLP can presently state with certainty that there is essentially no prospect of this tariff point being used in the future. SPLP presently has no indication whatsoever of any shipper being interested in utilizing the point proposed to be abandoned.

24. Given the lack of prospects of the system being used in the future, this factor weighs completely in favor of granting the Application and allowing abandonment.

C. BALANCING THE UTILITY'S LOSS WITH THE HARDSHIP ON THE PUBLIC

25. The third factor focuses on balancing the loss to the utility with the convenience and hardship to the public upon discontinuance of service. This factor weighs completely in favor of granting the Application.

26. Here, since Willow Grove has not been used in the past approximately 13 years, there is no hardship imposed on the public by the abandonment. Thus, given the loss to the utility described above, the factor weighs completely in favor of granting the Application.

D. THE AVAILABILITY OF ALTERNATIVE SERVICE

27. To the extent this factor is relevant here, where there has not been any utilization of this tariff delivery point in the past approximately 13 years, this factor weighs in favor of abandoning service.

28. SPLP does not believe the availability of alternative service is relevant here because no customers are currently utilizing the service, and thus there is no customer that will need to utilize an alternative because of the abandonment. Regardless, there are alternatives available for the shipment of refined products and propane, including rail, truck, and other pipelines. Accordingly, this factor weighs in favor of granting the Application.

VIII. CONCLUSION

WHEREFORE, SPLP respectfully requests the Commission:

- (1) grant a certificate of public convenience authorizing the proposed abandonment as described herein; and
- (2) grant any other necessary or appropriate approvals regarding the proposed abandonment.

Respectfully submitted,

/s/ Whitney E. Snyder

Whitney E. Snyder, Attorney I.D. No. 316625

Thomas J. Sniscak, Attorney I.D. No. 33891

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Counsel for Sunoco Pipeline L.P.

Dated: October 4, 2024

Exhibit List

Exhibit A – Map of Point to Be Abandoned

Exhibit B - Redline and Pro Forma Tariff Supplement

Exhibit C – Final Year of Service Revenues (Public Version, redacted)

Exhibit D – Non-Opposition Letters

Exhibit A

Map

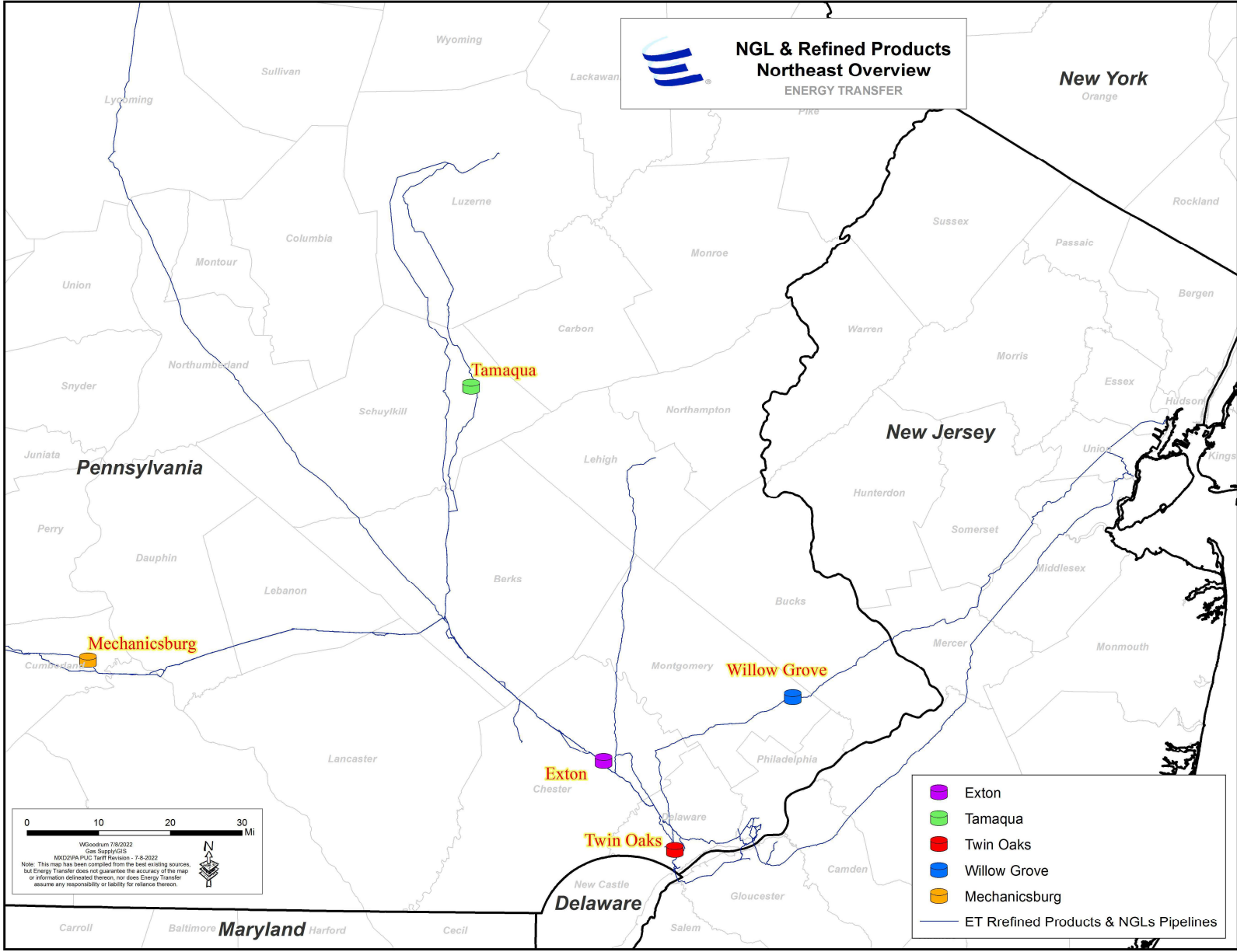


Exhibit B

Redline and Pro Forma Tariff

Eighth Revised Pg. No. 2 Cancelling Seventh Revised Pg. No. 2

TO		TRUNK RATE			
		FROM			
		Point Breeze, Philadelphia County, Pennsylvania		Montello, Berks County, Pennsylvania (Laurel Pipeline Company)	Twin Oaks, Delaware County, Pennsylvania
POINTS IN PENNSYLVANIA	COUNTY	Rate in Cents per Barrel of 42 U.S. Gallons			
Chelsea	Delaware				8.76
Exton	Chester	48.77			48.77
Fullerton	Lehigh	70.28			
Kingston	Luzerne	82.10		49.20	70.28
Macungie	Lehigh	66.19			82.10
					66.19
Malvern	Chester	43.25			43.25
Montello	Berks	32.90			32.90
Northumberland	Northumberland	76.38		43.48	76.38
Tamaqua	Schuylkill	78.50			
Williamsport	Lycoming	80.75		47.85	80.75
		Salem Westmoreland County, Pennsylvania (Laurel Pipeline Company)		Chelsea, Delaware County, Pennsylvania	
Blawnox	Allegheny	19.82			
Delmont	Westmorland	14.86			
Pittsburgh	Allegheny	17.61			
Willow Grove	Montgomery			44.04	50.82 [C]
		Mechanicsburg, Cumberland County, Pennsylvania	Independence, Washington County, Pennsylvania	Houston, Washington County, Pennsylvania	Delmont, Westmorland County, Pennsylvania
Twin Oaks	Delaware	291.00 (i)	394.41 (i)	304.00 (i)(ii) 411.41 (iii) [C]	303.00 (i)
Sinking Spring	Berks			303.00 (i) 410.41 (iii) [C]	
Jackson	Cambria			303.00 (ii)	

(i) This rate is for the transportation of propane as defined by Item 15, Specification C in Sunoco Pipeline L.P.’s Tariff Pipeline – Pa. P.U.C. No. 20. [C]

(ii) This rate is for the transportation of ethane as defined by Item 15, Specification C in Sunoco Pipeline L.P.’s Tariff Pipeline – Pa. P.U.C. No. 20. [C]

(iii) This rate is for the transportation of butane as defined by Item 15, Specification C in Sunoco Pipeline L.P.’s Tariff Pipeline – Pa. P.U.C. No. 20. [C]

Supplement No. 10 to Tariff Pipeline - Pa. P.U.C. No. 16

SUNOCO PIPELINE L.P.

LOCAL TARIFF

Applying On

**The Intrastate Transportation of
Petroleum and Refined Petroleum Products
Within
Pennsylvania**

The rates contained herein are for the intrastate transportation of petroleum and refined petroleum products by pipeline, and are governed by the rules and regulations published in Sunoco Pipeline L.P.'s Tariff Pipeline - Pa. P.U.C. No. 20, supplements thereto and successive reissues thereof.

ISSUED: October 4, 2024

EFFECTIVE: December 3, 2024

Issued by:
RB Herrscher,
EVP - NGLs Ref Prod Petrochem
ET GC Business Development.
Energy Transfer Operations GP LLC,
the General Partner of
Sunoco Pipeline L.P.
3805 West Chester Pike
Newtown Square, PA 19073

Compiled by:
Diane A. Daniels
on behalf of
Sunoco Pipeline L.P.
1300 Main Street
Houston, TX 77002
tariffs@energytransfer.com

LIST OF CHANGES MADE BY THIS SUPPLEMENT

Supplement No. 10 removes Willow Grove as a destination point.

SUNOCO PIPELINE L.P.

Supplement No. 10 to Tariff Pipeline – Pa. P.U.C. No. 16

Eighth Revised Pg. No. 2 Cancelling Seventh Revised Pg. No. 2

TO		TRUNK RATE			
		FROM			
		Point Breeze, Philadelphia County, Pennsylvania		Montello, Berks County, Pennsylvania (Laurel Pipeline Company)	Twin Oaks, Delaware County, Pennsylvania
POINTS IN PENNSYLVANIA	COUNTY	Rate in Cents per Barrel of 42 U.S. Gallons			
Chelsea	Delaware				8.76
Exton	Chester	48.77			48.77
Fullerton	Lehigh	70.28			70.28
Kingston	Luzerne	82.10	49.20		82.10
Macungie	Lehigh	66.19			66.19
Malvern	Chester	43.25			43.25
Montello	Berks	32.90			32.90
Northumberland	Northumberland	76.38	43.48		76.38
Tamaqua	Schuylkill	78.50			
Williamsport	Lycoming	80.75	47.85		80.75
		Salem Westmoreland County, Pennsylvania (Laurel Pipeline Company)		Chelsea, Delaware County, Pennsylvania	
Blawnox	Allegheny	19.82			
Delmont	Westmorland	14.86			
Pittsburgh	Allegheny	17.61			[C]
		Mechanicsburg, Cumberland County, Pennsylvania	Independence, Washington County, Pennsylvania	Houston, Washington County, Pennsylvania	Delmont, Westmorland County, Pennsylvania
Twin Oaks	Delaware	291.00 (i)	394.41 (i)	304.00 (i)(ii) 411.41 (iii) [C]	303.00 (i)
Sinking Spring	Berks			303.00 (i) 410.41 (iii) [C]	
Jackson	Cambria			303.00 (ii)	

(i) This rate is for the transportation of propane as defined by Item 15, Specification C in Sunoco Pipeline L.P.’s Tariff Pipeline – Pa. P.U.C. No. 20.

(ii) This rate is for the transportation of ethane as defined by Item 15, Specification C in Sunoco Pipeline L.P.’s Tariff Pipeline – Pa. P.U.C. No. 20.

(iii) This rate is for the transportation of butane as defined by Item 15, Specification C in Sunoco Pipeline L.P.’s Tariff Pipeline – Pa. P.U.C. No. 20.

EXPLANATION OF REFERENCE MARK: [C] CHANGE

ISSUED: October 4, 2024

EFFECTIVE: December 3, 2024

Exhibit C
Final Year Revenues

PUBLIC VERSION

Willow Grove (Last Delivery 12/12/2011)

Products: Heating Oil & Gasoline

Shipper	Volume	Final Year Revenue (PA PUC Tariff)
Sunoco LP (SUN)		
Total		

Exhibit D
Non-Opposition Letter



October 2, 2024

Sunoco Pipeline LP
c/o Mr. Greg Mcilwain, EVP – Operations
8111 Westchester Drive
Dallas, TX 75225

Re: Non-Opposition of Proposed Partial Abandonment of Petroleum and Refined
Products Transportation Service by Sunoco Pipeline L.P.

Dear Mr. Mcilwain:

Sunoco LP understands that Sunoco Pipeline L.P. will submit an application to the Pennsylvania Public Utility Commission (“Commission”) requesting authority to abandon intrastate petroleum and refined products pipeline transportation services to Willow Grove, Montgomery County, Pennsylvania.

I can confirm that Sunoco LP has not used Willow Grove as a destination point for approximately 13 years and has no future intentions to do so.

Please be advised that Sunoco LP will not oppose the proposed abandonment and hereby authorizes Sunoco Pipeline L.P. to represent Sunoco LP’s non-opposition in any formal proceedings before the Commission or other regulatory authorities

Sincerely,

Signed by:

0699791F7C884F6...

Lauren Longo
Director, Scheduling

VERIFICATION

I, Curtis N. Stambaugh, Esquire, Assistant General Counsel at Energy Transfer, on behalf of **Sunoco Pipeline L.P.**, hereby state that the facts set forth above in the “Application of Sunoco Pipeline L.P. for: (1) Issuance of a Certificate of Public Convenience Authorizing the Abandonment of a Portion of Its Petroleum Products Pipeline Transportation Service” 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).



Date: October 4, 2024

Curtis N. Stambaugh, Esquire
Energy Transfer

On behalf of Sunoco Pipeline L.P.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the Application (Public Version) upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA ELECTRONIC MAIL ONLY

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Dated this 4th day of October, 2024

/s/ Whitney E. Snyder
Whitney E. Snyder