

April 21, 2014

Via Electronic Filing

Rosemary Chiavetta, Esquire
PA Public Utility Commission
Commonwealth Keystone Building, 2 North
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Docket No.: P-2014-2411966
Petition of Sunoco Pipeline LP
East Goshen Township's Petition to Intervene**

Dear Secretary Chiavetta:

Attached for filing is the Petition to Intervene of East Goshen Township ("East Goshen") in the above captioned proceedings.

As indicated on the attached Certificate of Service, a copy of East Goshen's Petition to Intervene has been provided to the service list in the manner indicated.

If there are any questions, please do not hesitate to contact me.

Very truly yours,

Reger Rizzo & Darnall LLP



Margaret A. Morris

MAM/jmm
Enclosure

cc: Kristin S. Camp, Esquire, Buckley Brion McGuire & Morris LLP [w/enc.]
Louis F. Smith, Manager, East Goshen Township [w/enc.]



PENNSYLVANIA
PUBLIC UTILITY COMMISSION

CONSUMERINFO UTILITY&INDUSTRY FILING&RESOURCES ABOUTPUC CONTACTUS

[Login to eFiling](#) | [Contact Us](#) | [Search](#)

- [My Filings](#)
- [New Filing](#)
- [Modify Account](#)
- [POR Search](#)
- [eService Directory](#)
- [Subscriptions](#)
- [Technical Assistance](#)
- [eFiling FAQs](#)
- [Log Off](#)

eFiling Successfully Transmitted



Your filing has been electronically received. Upon review of the filing for conformance with the Commission's filing requirements, a notice will be issued acknowledging such compliance and assigning a Docket Number. The matter will receive the attention of the Commission and you will be advised if any further action is required on your part.

Print this page for your records. The date filed on will be the current day if the filing occurs on a business day before or at 4:30 PM Harrisburg, PA time. It will be the next business day if the filing occurs after 4:30 PM Harrisburg, PA time or on weekends or holidays.

If your filing exceeds 250 pages, you are required to submit one paper copy of the filing within 3 business days of submitting the electronic filing. This paper copy can be mailed to: Secretary, Pennsylvania Public Utility Commission, Commonwealth Keystone Building, 400 North Street, 2nd Floor, Harrisburg, PA 17120 . Please print a copy of this page and attach it to the paper copy of your filing as the first page.

eFiling Confirmation	
Docket Number:	P-2014-2411941
Description:	Petition of Sunoco LP P-2014-2411966
Transmission Date:	4/21/2014 11:21:27 AM
Filed On:	4/21/2014 11:21:27 AM
eFiling Confirmation Number:	1544846

Uploaded File List

File Name	Document Class	Document Type
EGT Petition to Intervene.pdf	Other Filing	Petition to Intervene

You can view a record of any previous eFiling, including the one you just made, by clicking the [My Filings](#) link in the left menu.

If a paper copy is required in accordance with the eFiling Regulations, please print this page and include it with your paper filing.

Customer Hotline 1-800-692-7380 | [PUC Webmaster](#)

© PUC All Rights Reserved

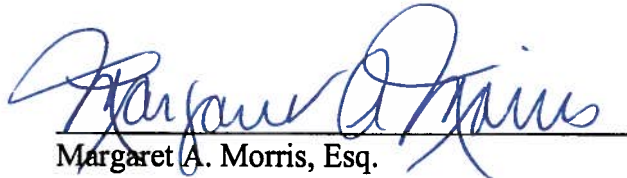
[Logout](#)

**Re: Docket No.: P-2014-2411966
Petition of Sunoco Pipeline LP
East Goshen Township's Petition to Intervene**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served upon the following persons on the attached service list, in the manner indicated, in accordance with the requirements of §1.54 (relating to service by a participant).

Dated: April 21, 2014


Margaret A. Morris, Esq.

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing document has been served upon the participants listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA ELECTRONIC MAIL

Robert A. Weishaar, Jr.
McNees Wallace & Nurick, LLC
777 North Capitol Street, NE
Suite 401
Washington, DC 20002
Rweishaar@mwn.com

Adelou A. Bakare
Teresa K. Schmittberger
McNees Wallace & Nurick, LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
abakare@mwn.com
tschmittberger@mwn.com

VIA FIRST CLASS MAIL

John R. Evans, Esquire
Office of Small Business Advocate
Suite 1102, Commerce Building
300 North Second Street
Harrisburg, PA 17101

David Hoover, Supervisor
Cambria Township Board Supervisors
184 Municipal Rd.
Ebensburg, PA 15391

Tanya McCloskey, Esquire
Aron J. Beatty, Esquire
Office of Consumer Advocate
555 Walnut Street
Forum Place - 5th Floor
Harrisburg, PA 17101-1921

Dennis Simmers, Chairman
Cambria Township Planning Commission
P.O. Box 248
Revloc, PA 15948

Johnnie Simms, Esquire
Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor West
Harrisburg, PA 17120

David E. Burchfield, Jr., Chairman
Allegheny Township Board of Supervisors
3131 Colonial Dr.
Duncansville, PA 16635

Bruce J Pergament, Supervisor
Penn Township Board of Supervisors
12281 Redstone Ridge Rd.
Hesston, PA 16647

Robert Zundell, Chairman
Salem Township Board of Supervisors
244 Congruity Rd.
Greensburg, PA 15601

Judith A. Hicks, Chairwoman
Shirley Township Board of Supervisors
15480 Croghan Pike
Shirleysburg, PA 17260

Lynn Cain
Salem Township Planning Commission
244 Congruity Rd.
Greensburg, PA 15601

Tony Distefano, Supervisor
Burrell Township Board of Supervisors
321 Park Drive
Blacklick, PA 15716

Kenneth A. Umholtz, Chairman
E. Wheatfield Board of Supervisors
1114 Rt. 56
East Armagh, PA 15920

James Burkholder, Jr., Chairman
Lower Frankford Township
Board of Supervisors
1205 Easy Rd.
Carlisle, PA 17015

Craig Houston, Chairman
Lower Frankford Township Planning
Commission
1205 Easy Rd.
Carlisle, PA 17015

Al Bienstock, President
Hampden Township Board of
Commissioners
230 South Sporting Hill Rd.
Mechanicsburg, PA 17050

Philip Klotz, Chairman
Hampden Township Planning Commission
230 South Sporting Hill Rd.
Mechanicsburg, PA 17050

Ronald Kopp, Chairman
Londonderry Township Board of
Supervisors
783 S. Geyers Church Rd.
Middletown, PA 17057

John McGarvey, Chair
Shirley Township Planning Commission
15480 Croghan Pike
Shirleysburg, PA 17260

James J. Henry, Chairman
Toboyne Township Board of Supervisors
50 Lower Buck Ridge Rd.
Blain, PA 17006

James H. Turner, Chairman
Tri-County Regional Planning Commission
Dauphin County Veterans Memorial Building
112 Market Street, 2nd Floor
Harrisburg, PA 17101

Jacque A. Smith, Chairman
West Cocalico Township Board of
Supervisors
P.O. Box 244
Reinholds, PA 17569

Leon Eby, Chairman
West Cocalico Township Planning
Commission
P.O. Box 244
Reinholds, PA 17569

James R. Oswald, Chairman
Spring Township Planning Commission
2850 Windmill Rd.
Sinking Spring, PA 19608

Jeffrey M. Fiant, Chairman
Brecknock Township Board of Supervisors
889 Alleghenyville Rd.
Mohnton, PA 19540

John R. Burger, Chairman
Brecknock Township Planning Commission
889 Alleghenyville Rd.
Mohnton, PA 19540

Carolyn Akers, Chair
Londonderry Township Planning
Commission
783 S. Geyers Church Rd.
Middletown, PA 17057

Catherine A. Tomlinson, Chair
Upper Uwchlan Township Board of
Supervisors
140 Pottstown Pike
Chester Springs, PA 19425

Russell L. Gible, Chairman
West Cornwall Township Board of
Supervisors
73 South Zinns Mill Rd.
Lebanon, PA 17042

Robert J. Schoenberger, Chair
Upper Uwchlan Township Planning
Commission
140 Pottstown Pike
Chester Springs, PA 19425

Dewey Yoder
West Cornwall Township Planning
Commission
73 South Zinns Mill Rd.
Lebanon, PA 17042

Carl DeiCas, Chair
Union Township Board of Supervisors
3904 Finleyville-Elrama Road
Finleyville, PA 15332

Patricia B. McIlvaine, Chair
West Goshen Township Board of
Supervisors
1025 Paoli Pike
West Chester, PA 19380

Tamira Spedaliere, Township Planner
Rostraver Township
201 Municipal Drive
Belle Vernon, PA 15012

Monica Drewniany, Chair
West Goshen Township Planning
Commission
1025 Paoli Pike
West Chester, PA 19380

Douglas Weimer, Chairman
Hempfield Township Board of Supervisors
1132 Woodward Drive, Suite A
Greensburg, PA 15601-9310

Michael Gaudiuso, President
Upper Chichester Board of Commissioners
P.O. Box 2187
Upper Chichester, PA 19061

Phil Shelapinsky, Chairperson
Hempfield Township Planning Commission
1132 Woodward Drive, Suite A
Greensburg, PA 15601-9310

James Renner, Chairman
Upper Chichester Planning Commission
P.O. Box 2187
Upper Chichester, PA 19061

Bruce Light, Township Manager
Penn Township
2001 Municipal Court
Harrison City, PA 15636-1349

Jodi Noble, Township Manager
Chartiers Township
2 Buccaneer Dr.
Houston, PA 15342

Phillip Miller, Chairman
Penn Township Planning Commission
2001 Municipal Court
Harrison City, PA 15636-1349

Thomas L. Mehaffie III, President
Lower Swatara Township Board
1499 Spring Garden Drive
Middletown, PA 17057

Lee Nickovich, Chairman
Chartiers Township Planning Commission
2 Buccaneer Dr.
Houston, PA 15342

Vincent DeCario, Chairman
Derry Township Board of Supervisors
5231 Route 982
Derry, PA 15627

Frank Siffrinn, Township Manager
North Strabane Township
1929 Route 519
Canonsburg, PA 15317

George Henry, Chairman
Frankstown Township Board of Supervisors
2122 Frankstown Road
Hollidaysburg, PA 16648

Robert Balogh, Chairman
North Strabane Township
1929 Route 519
Canonsburg, PA 15317

Chauncey D. Knopp
Lower Swatara Township Planning
Commission
1499 Spring Garden Drive
Middletown, PA 17057

Andrew Tullai, Chairman
Union Township Board of Supervisors
3904 Finleyville-Elrama Road
Finleyville, PA 15332

Patti Smith
Spring Township Board of Supervisors
2850 Windmill Rd.
Sinking Spring, PA 19608

Harry Kelso, Chairman
North Middleton Township Board of
Supervisors
2051 Spring Road
Carlisle, PA 17013

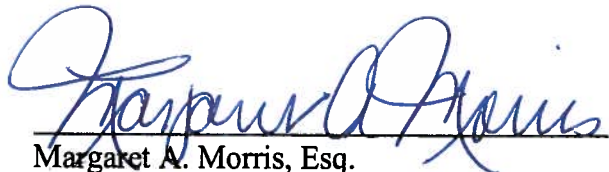
Rob Jones, Chairman
Wallace Township Board of Supervisors
P.O. Box 670
Glenn Moore, PA 19343

Robert P. Stanley, Jr.
Fairview Township Board of Supervisors
599 Lewisberry Road
New Cumberland, PA 17070

John Frommeyer, Chairman
Wallace Township Planning Commission
1250 Creek Road
P.O. Box 670
Glenn Moore, PA 19343

Michael A. Powers
Fairview Township Planning Commission
599 Lewisberry Road
New Cumberland, PA 17070

Date: April 21, 2014



Margaret A. Morris, Esq.
Attorney for East Goshen Township Board of
Supervisors

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Sunoco Pipeline LP for a Finding	:	Wallace Township, Chester County
For a Finding that the Situation of Structures	:	(Docket No. P-2014-2412411941),
To Shelter Pump Stations and Valve Control	:	Burrell Township, Indiana County
Is Reasonably Necessary for the Convenience	:	(Docket No. P. 2014-2411942),
Or Welfare of the Public	:	Lower Swatara Township, Dauphin County
	:	(Docket No. P-2014-2411943),
	:	East Wheatfield Township, Indiana County
	:	(Docket No. P-2014-2411944),
	:	Fairview Township, York County
	:	(Docket No. P-2014-2411945),
	:	North Middleton Township, Cumberland
	:	County (Docket No. P-2014-2411946)
	:	Frankstown Township, Blair County
	:	(Docket No. P-2014-2411948)
	:	Cambria Township, Cambria County
	:	(Docket No. P-2014-2411950)
	:	Derry Township, Westmoreland County
	:	(Docket No. P-2014-2411951)
	:	Loyalhanna Township, Westmoreland
	:	County (Docket No. P-2014-2411952)
	:	Penn Township, Westmoreland County
	:	(Docket No. P-2014-2411953)
	:	Hempfield Township, Westmoreland
	:	County (Docket No. P-2014-2411954)
	:	Rostraver Township, Westmoreland
	:	County (Docket No. P-2014-2411956)
	:	Allegheny Township, Blair County
	:	(Docket No. P-2014-2411957)
	:	Union Township, Washington County
	:	(Docket No. P-2014-2411958)
	:	North Strabane Township, Washington
	:	County (Docket No. P-2014-2411960)
	:	Penn Township, Huntingdon County
	:	(Docket No. P-2014-2411961)
	:	Chartiers Township, Washington County
	:	(Docket No. P-2014-2411963)
	:	Shirley Township, Huntingdon County
	:	(Docket No. P-2014-2411964)
	:	Upper Chichester Township, Delaware
	:	County (Docket No. P-2014-2411965)
	:	West Goshen Township, Chester County
	:	(Docket No. P-2014-2411966)
	:	Toboyne Township, Perry County
	:	(Docket No. P-2014-2411967)
	:	Upper Uwchlan Township, Chester County
	:	(Docket No. P-2014-2411968)
	:	Brecknock Township, Berks County
	:	(Docket No. P-2014-2411971)
	:	Spring Township, Berks County
	:	(Docket No. P-2014-2411972)
	:	Hampden Township, Cumberland County
	:	(Docket No. P-2014-2411974)

- : West Cocalico Township, Lancaster County
- : (Docket No. P-2014-2411975)
- : Londonderry Township, Dauphin County
- : (Docket No. P-2014-2411976)
- : West Cornwall Township, Lebanon County
- : (Docket No. P-2014-2411977)
- : Lower Frankford Township, Cumberland
- : County (Docket No. P-2014-2411979) and
- : Salem Township, Westmoreland County
- : (Docket No. P-2014-2411980)

**PETITION TO INTERVENE OF
THE BOARD OF SUPERVISORS OF EAST GOSHEN TOWNSHIP**

The Board of Supervisors of East Goshen Township (EGT), by and through its undersigned attorneys, pursuant to 52 Pa. Code §§ 5.71-76 and in accordance with the Notice published in the *Pennsylvania Bulletin* at 44 Pa.B. 2145 (April 5, 2014), hereby files this Petition to Intervene in the above-captioned consolidated proceedings.

I. Introduction

On March 21, 2014, Sunoco Pipeline LP (Sunoco or Petitioner) filed a Petition at the above-consolidated proceedings, including in relevant part, Docket No. P-2014-2411966, requesting a finding that: 1) Petitioner is a public utility corporation; and 2) the situation of Sunoco’s buildings to shelter pump stations and valve control stations in 31 Pennsylvania municipalities is reasonably necessary for the convenience and welfare of the public and therefore, that the buildings are exempt from any local zoning, subdivision and land development regulations (Petition).

Sunoco proposes to develop its pipeline project, Mariner East, which involves the construction of a pump station and valve control station at 1261 Boot Road, West Goshen Township, Chester County, Pennsylvania. *See*, Exhibit A of Petition. Sunoco asserts that the purpose of Mariner East is to increase transportation infrastructure within the Commonwealth of Pennsylvania for the movement of Marcellus Shale

resources and will utilize Sunoco's existing pipeline infrastructure, in addition to the construction of the proposed pump and valve stations.¹

II. EGT's Interest and Standing to Intervene

In support of this Petition to Intervene, EGT provides the following additional information:

1. The instant intervenor is the Board of Supervisors of East Goshen Township, Chester County, Pennsylvania. The Petition has identified West Goshen Township as a location for the construction of one of the proposed pump stations to serve Mariner East; said location shares a contiguous border with East Goshen Township.

2. The intervenor's attorney in this proceeding is:

Margaret A. Morris, Esq.
Reger Rizzo & Darnall LLP
2929 Arch Street, 13th Floor
Philadelphia, PA 19104
(215) 495-6524 tel.
(215) 495-6600 fax
mmorris@regerlaw.com

3. Counsel for intervenor is authorized to accept service on behalf of EGT in this proceeding. EGT requests that the Commission and all parties of record serve copies of all documents (including but not limited to correspondence, discovery requests and answers, commission orders, pleadings and testimony) electronically on its counsel of record as well as by hard copy.

4. Sunoco is seeking a special exception pursuant to the West Goshen Township Zoning Ordinance to locate a public utility facility in an area currently zoned as residential and contiguous to the border of East Goshen Township. The interest of EGT and its citizenry will be directly affected by Sunoco's proposed construction of the

¹Mariner East will originate in Houston, Pennsylvania and will terminate in Claymont, Delaware within the Marcus Hook refinery complex.

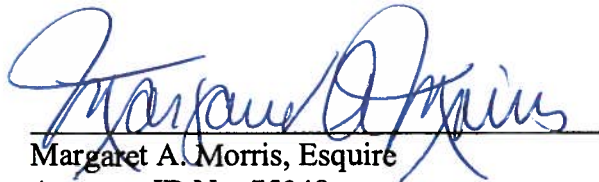
pump station at 1261 Boot Road and no other participant can adequately represent those interests. Due to the early stage of the proceeding, EGT reserves the right to formalize its position after it has had the opportunity to evaluate Sunoco's further filings, conduct discovery and review any additional information that may be provided, and to raise and/or address additional issues that may be identified by other parties.

5. As a result of Sunoco's proposal to locate a pump station on property contiguous to East Goshen Township, EGT satisfies the standard for intervention pursuant to 52 Pa. Code § 5.72(b).

III. Conclusion

WHEREFORE, the Board of Supervisors of East Goshen Township respectfully requests that the Commission and the presiding Administrative Law Judge grant its Petition to Intervene and issue full-party status in the consolidate proceedings.

Respectfully submitted,



Margaret A. Morris, Esquire
Attorney ID No. 75048
REGER RIZZO & DARNALL LLP
Cira Centre, 13th Floor
2929 Arch Street
Philadelphia, PA 19104
(215) 495-6524 tel.
(215) 495-6600 fax
mmorris@regerlaw.com

Dated: April 21, 2014

Attorney for the Board of Supervisors of
East Goshen Township

Petition of Sunoco Pipeline LP for a Finding
For a Finding that the Situation of Structures
To Shelter Pump Stations and Valve Control
Is Reasonably Necessary for the Convenience
Or Welfare of the Public


:
:
:
:
:
:

West Goshen Township, Chester County
(Docket No. P-2014-2411966)

VERIFICATION

I, Louis F. Smith, Jr. Manager for East Goshen Township, hereby state that the facts in the foregoing document(s) are true and correct to the best of my knowledge, information, and belief. I understand that false statements therein are made subject to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsifications to authorities.

Dated: April 18, 2014



Louis F. Smith, Jr.
Manager
East Goshen Township