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File #: 162860

February 21, 2017

***VIA ELECTRONIC FILING***

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Re: Application of Laurel Pipe Line Company, L.P. for All Necessary Authority, Approvals, and Certificates of Public Convenience To Change the Direction of Petroleum Products Transportation Service to Delivery Points West of Eldorado, Pennsylvania**  
**Docket No. A-2016-2575829**

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Dear Secretary Chiavetta:

Attached please find the Answer of Laurel Pipe Line Company, L.P. to the Petition to Intervene of Sunoco, LLC in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Anthony D. Kanagy

ADK/skr  
Enclosure

cc: Certificate of Service  
Honorable Eranda Vero

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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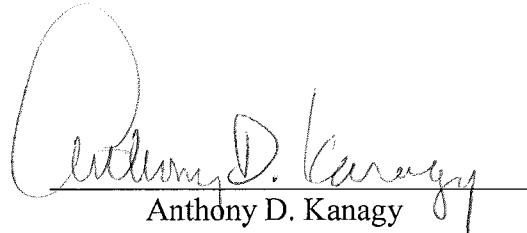
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Date: February 21, 2017



Anthony D. Kanagy

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Laurel Pipe Line Company, :  
L.P. for All Necessary Authority, Approvals, :  
and Certificates of Public Convenience To : Docket No. A-2016-2575829  
Change the Direction of Petroleum Products :  
Transportation Service to Delivery Points :  
West of Eldorado, Pennsylvania :

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**ANSWER OF LAUREL PIPE LINE COMPANY, L.P.  
TO THE PETITION TO INTERVENE  
OF SUNOCO, LLC**

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TO THE HONORABLE ADMINISTRATIVE LAW JUDGE ERANDA VERO:

Laurel Pipe Line Company, L.P. (“Laurel”) hereby files this Answer to the Petition to Intervene (“Petition”) filed by Sunoco, LLC (“Sunoco”) for the purposes of addressing and clarifying the allegations and assertions contained in Sunoco’s Petition. Laurel files this Answer pursuant to Sections 5.61 and 5.66 of the Pennsylvania Public Utility Commission’s (“Commission”) regulations, 52 Pa. Code §§ 5.61 and 5.66. In support thereof, Laurel respectfully represents the following:

**I. ANSWER TO THE PETITION TO INTERVENE**

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted in part; denied in part. The first sentence of paragraph 4 is admitted.

The second sentence in paragraph 4 is denied as stated. By way of further explanation the December 6, 2016 Secretarial Letter “granted in part” Gulf Operating, LLC’s Motion to Extend the Deadline for Protests. The final sentence in paragraph 4 is admitted.

5. Admitted in part; denied in part. The first two sentences in paragraph 5 are admitted. Laurel denies the final sentence in paragraph 5. As stated in the Application, and clarified throughout the pleadings, Buckeye Partners, L.P. is an indirect general partner of Laurel, as well as an indirect general partner of Buckeye. Buckeye Partners, L.P. is the parent of the general partner of both Laurel and Buckeye.

6. Admitted in part; denied in part. The first sentence of paragraph 6 calls for a legal conclusion to which no response is required. However, Laurel denies that the change in direction of service proposed by its Application “dramatically modifies” the service provided by Laurel. Deliveries on Laurel’s pipeline system will continue at all origin points and at all destination points; the only change is the direction of deliveries west of Eldorado. The second sentence of paragraph 5 is admitted.

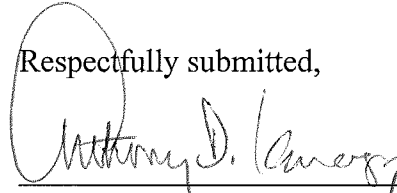
7. Admitted in part; denied in part. The first four sentences of paragraph 7 are admitted. However, the fifth sentence of paragraph 7 is denied. Laurel denies that its proposal would “eliminate the Pittsburgh supply source from the east, thus potentially causing shortages of gasoline for consumers in the Pittsburgh market in the summer.” By way of further response, low Reid Vapor Pressure (“RVP”) conventional gasoline is produced and available from the Midwest, and this gasoline meets the Department of Environmental Protection’s summer requirements. The sixth sentence of paragraph 7 is also denied as stated. Upon completion of Laurel’s proposed change in direction of flow, westbound transportation of petroleum and petroleum products over its pipeline will terminate at Eldorado, PA; however, shippers may opt to utilize trucking alternatives to continue product movements from Eldorado to Pittsburgh, as well as exchanges to access the Pittsburgh-area. The final two sentences of paragraph 7 are denied. Sunoco’s assertion assumes that upon completion of the proposed change in direction of

flow, low RVP products will not be shipped to Altoona. However, the pipeline will be capable of shipping low RVP gasoline to Altoona from either the Midwest and/or East Coast. Should shippers desire low RVP products to be delivered to terminals in Altoona, Laurel can accommodate those shipments.

8. Denied. Laurel does not have sufficient information to determine that Sunoco's interest in this proceeding is significant. Therefore, this assertion is denied. However, Laurel does not object to Sunoco's intervention in this proceeding.

**WHEREFORE**, Laurel Pipe Line Company, L.P. does not object to the Petition to Intervene of Sunoco, LLC, subject to Laurel Pipe Line Company, L.P.'s responses to the allegations contained therein.

Respectfully submitted,



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Date: February 21, 2017

*Counsel for Laurel Pipe Line Company, L.P.*

## VERIFICATION

I, David Arnold, being Vice President, Domestic Pipelines for Buckeye Partners, L.P., hereby state that the information set forth above is true and correct to the best of my knowledge, information and belief, and that if asked orally at a hearing in this matter, my answers would be as set forth therein. 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: 21 February 2017



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David Arnold  
Vice President, Domestic Pipelines  
Buckeye Partners, L.P.