

Thomas J. Sniscak (717) 703-0800 tjsniscak@hmslegal.com

Kevin J. McKeon (717) 703-0801 kjmckeon@hmslegal.com

Whitney E. Snyder (717) 703-0807 wesnyder@hmslegal.com

100 North Tenth Street, Harrisburg, PA 17101 Phone: 717.236.1300 Fax: 717.236.4841 www.hmslegal.com

January 29, 2019

**BY ELECTRONIC FILING** 

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

## Re: West Goshen Township v. Sunoco Pipeline L.P.; Docket No. C-2017-2589346; AFFIDAVIT OF MATTHEW GORDON

Dear Secretary Chiavetta:

Pursuant to the Commission's October 1, 2018 Order in the above-captioned proceeding, enclosed please find Sunoco Pipeline L.P.'s Affidavit of Matthew Gordon.

Very truly yours,

romas J. Sniscak

Thomas J. Sniscak Kevin J. McKeon Whitney E. Snyder

Counsel for Sunoco Pipeline L.P.

TJS/WES/das Enclosure

cc: Honorable Elizabeth H. Barnes (via email and first class mail) Per Certificate of Service

WEST GOSHEN TOWNSHIP AND	
CONCERNED CITIZENS OF WEST	
GOSHEN TOWNSHIP	
Compl	aint,
V.	
SUNOCO PIPELINE L.P.,	
Respor	ident.

Docket No. C-2017-2589346

AFFIDAVIT OF MATTHEW GORDON

Matthew Gordon states as follows:

1. I am employed by Sunoco Pipeline L.P. ("SPLP") as the Senior Director for the Mariner East 2 pipeline project. I am authorized to make this Affidavit on behalf of SPLP.

2. On October 1, 2018, the Pennsylvania Public Utility Commission ("PUC") issued an order affirming the Recommended Decision in West Goshen Township's ("WGT") Complaint proceeding against SPLP. In that order, Ordering Paragraph 5 requires that SPLP install automated or remotely controlled valves at MP 335-Eagle Pump Station, MP 341.1-East Lincoln Highway, and MP 350.5-Middletown Road within 120 days of the Order, on Tuesday, January 29, 2019. SPLP is then required to file an affidavit attesting to such installation within thirty (30) days, on Thursday, February 28, 2019.

3. At this time, the pipeline in the areas of MP 335-Eagle Pump Station, MP 341.1-East Lincoln Highway, and MP 350.5-Middletown Road has not yet been completed. The pipeline is not expected to be completed prior to the January 29<sup>th</sup> 120-day deadline. Accordingly, in the absence of a completed pipeline, the automated or remotely controlled valves cannot be installed prior to the January 29<sup>th</sup> 120-day deadline.

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4. Although the installation of the valves has been delayed due to the delay in the construction of the pipeline in West Goshen Township, SPLP fully intends to comply with the intent of Commission's October 1<sup>st</sup> Order and confirms and commits that it will install the automated or remotely controlled valves prior to placing this segment of the pipeline in service.

5. SPLP will file an updated affidavit notifying the PUC when it completes construction and installation of the automated or remotely controlled valves. That filing will be served upon all parties of record on the day of filing.

6. I understand that the statements set forth herein are made subject to 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.

Dated: 1/28/2019

MATTHEW GORDON

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of § 1.54 (relating to service by a party). This document has been filed electronically on the Commission's electronic filing system.

## VIA EMAIL AND FIRST-CLASS MAIL

Douglas Wayne, Esquire High Swartz LLP 116 East Court Street Doylestown, PA 18901 dwayne@highswartz.com

Counsel for West Goshen Township

David J. Brooman, Esquire Richard Sokorai, Esquire Mark R. Fischer, Jr., Esquire High Swartz LLP 40 East Airy Street Norristown, PA 19404 <u>dbrooman@highswartz.com</u> <u>rsokorai@highswartz.com</u> <u>mfischer@highswartz.com</u>

Counsel for West Goshen Township

mas J. Sniscak

Thomas J. Sniscak Kevin J. McKeon Whitney E. Snyder

Counsel for Sunoco Pipeline L.P.

Dated: January 29, 2019