

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Meghan Flynn, Rosemary Fuller,	:	Docket No. P-2018-3006117
Michael Walsh, Nancy Harkins,	:	Docket No. C-2018-3006116
Gerald McMullen, Caroline Hughes,	:	
and Melissa Haines	:	
v.	:	
Sunoco Pipeline, L.P.	:	

**EDGMONT TOWNSHIP’S RESPONSE TO SUNOCO PIPELINE, L.P.’S
ANSWER OPPOSING INTERVENTION OF EDGMONT TOWNSHIP**

1. - 3. Admitted.

4. It is admitted that the Petition was not filed within the proscribed time frames.

However, any inferences related to the late filing and the merits of the Petition to Intervene are specifically denied.

5. Admitted.

6. It is admitted that the averment accurately states the Rule related to filing of a Petition for Intervention.

7. - 9. Denied as a conclusion of law. Therefore, no affirmative response is required.

To the extent this averment is factual in nature, the same is specifically denied.

10. Admitted.

11. Denied as stated. This averment is a conclusion of law which requires no affirmative response. To the extent this averment is factual in nature, the same is specifically denied and strict proof thereof is demanded. Furthermore, it became apparent to Edgmont Township as the process and the litigation continued that the interests of the residents of Edgmont Township were not being adequately addressed and the Board of Supervisors made a decision to intervene so that

the health, safety and welfare of their residents and First Responders would be given appropriate consideration by the Public Utility Commission in the instant litigation.

12. It is specifically denied that the relief requested by Edgmont Township is outside the law and applicable PHMSA regulation. Furthermore, one of the standards for permitting a party to intervene is that their interest in the matter was not being adequately addressed by the other parties to the litigation. Clearly, this Standard has been met and the requested relief addresses the primary areas of concern of Prospective Intervener Edgmont Township.

13. It is admitted that this averment outlines Edgmont's requested relief.

14. The Amended Complaint speaks for itself and any and all requests should be considered by the Commission to address the health, safety and welfare concerns of Edgmont Township residents and First Responders.

15. - 18. Denied. These averments are conclusions of law to which the rules require no affirmative response. To the extent these averments are factual in nature, the same are respectfully denied and strict proof thereof is demanded.

WHEREFORE, Edgmont Township respectfully requests that their Petition to Intervene is approved in the instant action.




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V E R I F I C A T I O N

I, MICHAEL P. PIERCE, ESQUIRE, verify that I am the attorney for Petitioner Edgmont Township in the foregoing Edgmont Township's Response to Sunoco Pipeline, L.P.'s Answer Opposing Intervention of Edgmont Township, and hereby verifies that the statements made in the foregoing are based upon the facts as explained by the Petitioner, which are true and correct, that I am authorized to make this statement on my client's behalf, and that the statements made herein are true and correct to the best of my knowledge, information and belief, pursuant to information provided to me by my client.

This statement is being made pursuant to the penalties of 18 Pa. C.S.A. §4904, relating to unsworn falsification to authorities.



MICHAEL P. PIERCE, ESQUIRE
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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).

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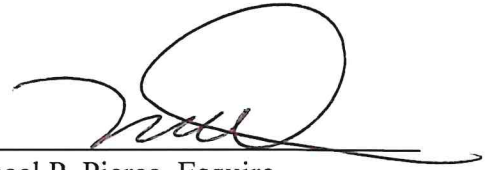
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A handwritten signature in dark ink, featuring a large, stylized 'M' and 'P' that are connected, with a long horizontal flourish extending to the right.

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