

LAW OFFICES  
PINNOLA & BOMSTEIN

MICHAEL S. BOMSTEIN  
PETER J. PINNOLA

ELKINS PARK OFFICE  
8039 OLD YORK ROAD  
ELKINS PARK, PA 19027  
(215) 635-3070  
FAX (215) 635-3944

100 SOUTH BROAD STREET, SUITE 2126  
PHILADELPHIA, PA 19110  
(215) 592-8383  
FAX (215) 574-0699  
EMAIL [mbomstein@gmail.com](mailto:mbomstein@gmail.com)

MT. AIRY OFFICE  
7727 GERMANTOWN AVENUE, SUITE 100  
PHILADELPHIA, PA 19119  
(215) 248-5800

REPLY TO:  
Center City

July 10, 2019

*Via Electronic Filing*

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

Re: Bureau of Investigation & Enforcements v.. Sunoco Pipeline L.P.,  
Docket No. C-2018-3006116 and P-2018-3006117  
**FLYNN COMPLAINANTS' REPLY TO SUNOCO'S NEW MATTER**

Dear Secretary Chiavetta:

Attached for electronic filing with the Commission is Flynn Complainants' Reply to Sunoco's New Matter in the above referenced case.

If you have any questions regarding this filing, please contact the undersigned.

Very truly yours,

  
MICHAEL S. BOMSTEIN, ESQ.

MSB:mik

cc: Per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MEGHAN FLYNN	:	
ROSEMARY FULLER	:	
MICHAEL WALSH	:	
NANCY HARKINS	:	
GERALD MCMULLEN	:	DOCKET NO. C-2018-3006116
CAROLINE HUGHES and	:	
MELISSA HAINES	:	DOCKET NO. P-2018-3006117

	Complainants	:
v.		:
		:
SUNOCO PIPELINE L.P.,		:
Respondent		:


**COMPLAINANTS' REPLY TO SUNOCO'S NEW MATTER**

Complainants, having been served with Sunocos' Answer to Second Amended Formal Complaint with New Matter, and desiring to respond thereto, hereby answer as follows:

145 - 158. Denied. Each of these averments contains conclusions of law to which no responsive pleading is required.

WHEREFORE, Complainants request that their Second Amended Formal Complaint not be dismissed.

Respectfully submitted,

  
Michael S. Bomstein, Esq.  
PINNOLA & BOMSTEIN  
PA I.D. NO. 21328  
100 South Broad Street, Suite 2126  
Philadelphia, PA 19110  
Tel.: (215) 592-8383  
Email: [mbomstein@gmail.com](mailto:mbomstein@gmail.com)

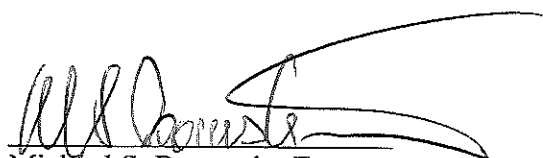
Attorney for Complainants

Dated: July 10, 2019

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document upon the persons listed below as per the requirements of § 1.54 (relating to service by a party). The document also has been filed electronically on the Commission's electronic filing system.

*See attached service list.*



Michael S. Bomstein, Esq.

Dated: July 10, 2019

(Revised 6.6.19)

MEGHAN FLYNN  
212 LUNDGREN ROAD  
LENNI PA 19052  
*Complainant*

ROSEMARY FULLER  
226 VALLEY ROAD  
MEDIA PA 19063  
610.358.1262  
Accepts E-Service  
*Complainant*

MICHAEL WALSH  
12 HADLEY LANE  
GLEN MILLS PA 19342  
*Complainant*

NANCY HARKINS  
1521 WOODLAND RD  
WEST CHESTER PA 19382  
484.678.9612  
Accepts E-Service  
*Complainant*

GERALD MCMULLEN  
200 HILLSIDE DRIVE  
EXTON PA 19341  
*Complainant*

CAROLINE HUGHES  
1101 AMALFI DRIVE  
WEST CHESTER PA 19380  
484.883.1156  
Accepts E-Service

MELISSA HAINES  
176 RONALD ROAD  
ASTON PA 19014  
*Complainant*

CURTIS STAMBAUGH ASSISTANT  
GENERAL COUNSEL  
SUNOCO PIPELINE LP  
212 N THIRD STREET SUITE 201  
HARRISBURG PA 17101  
717.236.1731  
Accepts E-Service  
*Representing Sunoco Pipeline LP*

NEIL S WITKES ESQUIRE  
ROBERT D FOX ESQUIRE  
DIANA A SILVA ESQUIRE  
MANKO, GOLD, KATCHER & FOX LLP  
401 CITY AVENUE  
VALA CYNWYD PA 19004  
484.430.2314  
484.430.2312  
484.430.2347  
Accepts E-Service  
*Representing Sunoco Pipeline LP*

THOMAS J SNISCAK ESQUIRE  
HAWKE MCKEON AND SNISCAK LLP  
100 N TENTH STREET  
HARRISBURG PA 17101  
717.236.1300  
Accepts E-Service  
*Representing Sunoco Pipeline LP*

RICH RAIDERS ATTORNEY  
606 NORTH 5<sup>TH</sup> STREET  
READING PA 19601  
484.509.2715  
Accepts E-Service  
*Representing Intervenor Andover  
Homeowners' Association Inc.*

ANTHONY D KANAGY ESQUIRE  
GARRET P LENT ESQUIRE  
POST & SCHELL PC  
17 N SECOND ST 12<sup>TH</sup> FL  
HARRISBURG PA 17101-1601  
717.612.6034  
Accepts E-Service  
*Representing Intervenor Range  
Resources Appalachia*

ERIN MCDOWELL ESQUIRE  
3000 TOWN CENTER BLVD  
CANONSBURG PA 15317  
725.754.5352  
*Representing Intervenor Range  
Resources Appalachia*

LEAH ROTENBERG ESQUIRE  
MAYS CONNARD & ROTENBERG LLP  
1235 PENN AVE  
SUITE 202  
WYOMISSING PA 19610  
610.400.0481  
Accepts E-Service  
*Representing Intervenor Twins Valley  
School District*

MARGARET A MORRIS ESQUIRE  
REGER RIZZO & DARNALL  
2929 ARCH STREET 13TH FLOOR  
PHILADELPHIA PA 19104  
215.495.6524  
Accepts E-Service  
*Representing Intervenor East Goshen  
Township*

VINCENT MATTHEW POMPO  
ESQUIRE  
LAMB MCERLANE PC  
24 EAST MARKET ST  
PO BOX 565  
WEST CHESTER PA 19381  
610.701.4411  
Accepts E-Service  
*Representing Intervenor West Whiteland  
Township*

MARK L FREED ESQUIRE  
JOANNA WALDRON ESQUIRE  
CURTIN & HEEFNER LLP  
DOYLESTOWN COMMERCE CENTER  
2005 S EASTON ROAD SUITE 100  
DOYLESTOWN PA 18901  
267.898.0570  
Accepts E-Service  
*Representing Intervenor Uwchlan  
Township*

JAMES R FLANDREAU  
PAUL FLANDREAU & BERGER LLP  
320 WEST FRONT ST  
MEDIA PA 19063  
610.565.4750  
Accepts E-Service  
*Representing Intervenor Middletown  
Township*

PATRICIA BISWANGER ESQUIRE  
PATRICIA BISWANGER  
217 NORTH MONROE STREET  
MEDIA PA 19063  
610.608.0687  
Accepts E-Service  
*Representing Intervenor County of  
Delaware*

ALEX JOHN BAUMLER ESQUIRE  
LAMB MCERLANE PC  
24 EAST MARKET ST  
BOX 565  
WEST CHESTER PA 19381  
610.701.3277  
Accepts E-Service  
*Representing Intervenor Downingtown  
Area School District, et al.*

GUY DONATELLI ESQUIRE  
LAMB MCERLANE PC  
24 EAST MARKET ST  
BOX 565  
WEST CHESTER PA 19381  
610.430.8000  
*Representing Intervenor Rose Tree  
Media School District*

JAMES DALTON  
UNRUH TURNER BURKE & FREES  
PO BOX 515  
WEST CHESTER PA 19381  
610.692.1371  
*Representing Intervenor West Chester  
Area School District*

JAMES BYRNE ESQUIRE  
MCNICHOL BYRNE & MATLAWSKI PC  
1223 N PROVIDENCE RD  
MEDIA PA 19063  
610.565.4322  
Accepts E-Service  
*Representing Intervenor Thornbury  
Township*

MICHAEL P PIERCE ESQUIRE  
MICHAEL P PIERCE PC  
17 VETERANS SQUARE  
PO BOX 604  
MEDIA PA 19063  
610.566.0911  
Accepts E-Service  
*Representing Edgmont Twp.*

MELISSA DIBERNARDINO  
1602 OLD ORCHARD LANE  
WEST CHESTER PA 19380  
484.881.2829  
Accepts E-Service

WHITNEY E. SNYDER ESQUIRE  
Hawke McKeon & Sniscak LLP  
100 N. 10th Street  
Harrisburg, PA 17101  
Accepts E-Service  
*Representing Sunoco*

VIRGINIA MARCILLE KERSLAKE  
103 SHOEN ROAD  
EXTON PA 19341  
215.200.2966  
Accepts E-Service  
*Intervenor*

LAURA OBENSKI  
14 S VILLAGE AVE  
EXTON PA 19341  
484.947.6149  
Accepts E-Service

REBECCA BRITTON  
211 ANDOVER DR  
EXTON PA 19341  
215.776.7516  
Accepts E-Service

JOSH MAXWELL  
MAYOR OF DOWNINGTOWN  
4 W LANCASTER AVENUE  
DOWNINGTON PA 19335  
*Intervenor*

THOMAS CASEY  
1113 WINDSOR DR  
WEST CHESTER PA 19380  
*Intervenor*

KELLY SULLIVAN ESQUIRE  
MCNICHOL BYRNE & MATLAWSKI  
1223 NORTH PROVIDENCE RD  
MEDIA PA 19063  
610.565.4322  
Accepts E-Service  
*Representing Thornbury Twp.*