



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE  
REFER TO OUR FILE

July 26, 2018

The Honorable John C. Rafferty, Jr.  
Senate of Pennsylvania  
20 East Wing  
Harrisburg, PA 17120

Dear Senator Rafferty:

Thank you for your letter of July 13, 2018, to Chairman Gladys Brown regarding the repurposing of a 12-inch petroleum line by Sunoco Pipeline, L.P. (Sunoco). I am responding on behalf of the Chairman.

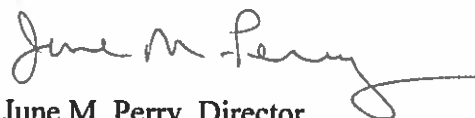
On June 15, 2018, pursuant to Section 59.33 of the Commission's regulations, Sunoco filed a construction notice with both the PUC and the U.S. Department of Transportation's Pipeline and Hazardous Materials Safety Administration (PHMSA) regarding modifications Sunoco intends to make to its refined petroleum products transportation system. Based upon our current understanding, Sunoco intends to convert approximately 25 miles of an existing refined products transportation pipeline in Chester and Delaware Counties to provide natural gas liquids service on the Mariner 2 system.

Construction notices are one means by which the Commission monitors construction activities by public utilities. However, neither the Public Utility Code nor Commission regulations require Sunoco to apply for specific Commission preapproval before commencing the construction identified in such notices. The Pipeline Safety Division in the Commission's Bureau of Investigation and Enforcement (BIE) uses the notices in assigning personnel and scheduling inspections. Moreover, if it has cause to do so, BIE can initiate a proceeding before the Commission to enjoin or modify any actions taken or proposed to be taken by a public utility. If our pipeline safety staff believes that the repurposed line poses a danger to the public, they will ask the Commission to take any necessary prompt and effective action to protect the public.

The Pipeline Safety Division informs me that Sunoco has conducted hydrostatic testing on the sections of the existing 12-inch refined products line it intends to use for NGL transportation. The Pipeline Safety Division is reviewing the results of the hydrostatic testing and may request Sunoco to conduct additional tests and analyses. Staff's review will include the safety issues that you identify in your letter. However, Pennsylvania's law requiring confidentiality of utility infrastructure information severely limits the Commission's ability to provide such information to the public. See 35 P.S. §§ 2141.1-2141.6. If our pipeline safety staff believes that the repurposed line poses a danger to the public, they will ask the Commission to take prompt and effective action to protect the public as they did with the sinkhole situation in West Whiteland Township.

Again, thank you for your letter. If I can be of further assistance to you or if you have any questions, please do not hesitate to contact my office at 787-3256.

Sincerely,

A handwritten signature in cursive script that reads "June M. Perry". The signature is written in black ink and has a long, sweeping tail that extends to the right.

June M. Perry, Director  
Office of Legislative Affairs

cc: Chairman Gladys M. Brown  
Secretary Chiavetta