

Sunoco Pipeline L.P.
Accounting Policies and Procedures
January 1, 2020

Section 1: Transit Variation Policy

During the course of normal operations, Sunoco Pipeline L.P. “Carrier” may over deliver or under deliver products versus what is received into the system. Positive transit variations (over deliveries) will result in charges to the Shipper and negative transit variations (under deliveries) will result in credits to the Shipper. Transit variations will be accounted for on a monthly basis and the calculation method is described below. Settlement prices are determined by the carrier and will consider product value, location, and pipeline operation.

Transit Variation Volume Calculation

A Shipper’s beginning/ending inventories at the open/close of the month, receipts and deliveries on each SPLP sub-system (Table A) will be aggregated by product to calculate total transit variation. Transit variation will not be considered for “transfer movements” which are defined as only utilizing one meter for receipt and delivery ticketing.

Table A

SPLP Sub-Systems
Eastern Products
Harbor Pipeline
Allegheny Access
Toledo North
Magtex

For each system the transit variation will be calculated as the following for each product:

$$\text{Transit Variation} = (\text{Ending Inventory} + \text{Deliveries}) - (\text{Beginning Inventory} + \text{Receipts})$$

The transit variations for each product will be summed to create the Total Transit Variation (Over/Short). See the example below (all amounts in barrels):

Product	Begin-Inv	Receipts	Deliveries	End-Inv	Over/(Short)
15MV2	0	10,000	9,400	500	-100
91CB23	0	20,000	19,700	0	-300
S83CB23	1,000	10,000	11,200	0	200
TRNSMX	0	0	100	0	100
Total	1,000	40,000	40,400	500	-100

Settlement Price Determination

Each product shipped will be assessed by the Carrier and will be assigned a value which the Carrier deems representative of the market value of the product, and accounts for normal pipeline operations. The Settlement Price will be the arithmetic monthly average of the low daily quotation of the postings listed in Table B.1 and Table B.2 rounded to the fourth decimal place. If a product is not listed below or a specific product impacts pipeline operations, Carrier will assess and assign a value at its sole discretion.

Table B.1-Settlement Price Basis for Sub-Systems:
Eastern Area, Harbor Pipeline, Allegheny Access, Toledo North

Product Description	Product Code	Price Marker
Diesel	15EXP2/15HO2/15MV2	Argus Diesel ULSD Buckeye pipe fob prompt Prmpt
Kerosene	15MV1	Argus Kerosene Buckeye pipe fob prompt Prmpt
Jet Fuel	JETA/JETAFTZ	Argus Jet fuel Buckeye pipe fob Prmpt
High Sulfur Heating Oils	500HO2/400AV1K/ HSUN2D	Argus Heating oil 500ppm Buckeye pipe fob prompt Prmpt
Generated Transmix	TRNSMX	Weighted Average Value of Products Received & Beginning Inventory
Received Transmix	STMIX	Transmix Settlement Price: Eastern/Harbor – Linden, Allegheny Access/Toledo North– Delmont
Regular Gasolines	S83CB/83RB/87CF	Low of 7.8, 9.0, Winter: Argus Gasoline reg CBOB Buckeye
Premium Gasolines	91CB/91RB/93CB	Low of 7.8, 9.0, Winter: Argus Gasoline prem CBOB Buckeye
Naphtha	NAPH	Low of 7.8, 9.0, Winter: Argus Gasoline reg CBOB Buckeye
Butanes	MIXBUT/ISO/BBUTY	Low of OPIS Mont Belvieu TET/NON-TET Normal Butane
Propane/Propylene	PROP/PRPL	Low of 7.8, 9.0, Winter: Argus Gasoline reg CBOB Buckeye

Table B.2-Settlement Price Basis for Sub-System:
Magtex

Product Description	Product Code	Price Marker
Diesel	UB/UC/61	Argus Diesel ULSD Colonial 62 pipe fob cycle 1
Jet Fuel	54 / 56	Argus Jet fuel Colonial 54 pipe fob cycle 1
Regular Gasolines	A / M	Argus Gasoline reg CBOB Colonial A pipe fob lowest RVP cycle 1
Premium Gasolines	D / V	Argus Gasoline prem CBOB Colonial D pipe fob lowest RVP cycle 1
Generated Transmix	TRNSMX	Weighted Average Value of Products Received & Beginning Inventory
Naphtha	NAPH	Argus Gasoline reg CBOB Colonial A pipe fob lowest RVP cycle 1

Settlement Charge/Credit Calculation

For each Shipper in a subsystem, the Carrier will calculate a settlement charge/credit for each Shipper's total transit variation in the subsystem. The settlement charge/credit will be calculated by multiplying the total transit variation by the weighted average settlement price for each Shipper. The weighted average settlement price will be calculated from the Settlement Prices listed in Table B.1, B.2 and the sum of Receipts and Beginning Inventory. The example below details the calculation of the settlement charge/credit.

Product	Sum of Receipts, Begin-Inv (bbls)	Settlement Price	Over/(Short) (bbls)	Settlement Charge/(Credit)
15MV2	10,000	\$76.2978	-100	
91CB23	20,000	\$75.6454	-300	
S83CB23	11,000	\$80.7213	200	
TRNSMX			100	
Total	41,000	77.1663	-100	\$ (7,717)

In the example above, the Shipper would be credited a settlement of \$7,717 for the loss of product.

Settlement charges/credits will be included in a Shipper's monthly invoice. If transit variation can be readily attributed to specific batches from a Shipper, or which can be attributed to discrete actions taken by the Shipper, the Shipper will be responsible for any expenses associated with the variation.

Section 2: Transmix Allocation Procedure

Allocation of Transmix Generated on Pipeline Segments

During the course of normal operations an interface (i.e. "transmix") between batches of dissimilar products is created. In order to protect product integrity upon receipt and delivery into and out of each pipeline segment, it is often necessary for the Carrier to separate the interface from the adjacent batches. The volume of transmix generated between batches varies in volume and content depending upon the two products involved and their routing through the pipeline system. Routes through the pipeline system are defined by the pipeline segments used to move the products from their receipt point to their destination in the system. The pipeline segments move product from an origin or intermediate point to a destination or another intermediate point as defined by the Carrier.

For pipeline segments mentioned in the list of Points of Accumulation in the Eastern Area, Harbor Pipeline and Allegheny Access sub-systems, the total Carrier inventory of transmix shall be held in Carrier's custody for disposal for the account of the Shippers. Generally, transmix shall be allocated at the end of each month and the allocation procedure for transmix held in the Carrier's custody is detailed in a later section. Transmix may be allocated directly to the Shipper for which

the generation of the transmix can be readily attributed to specific batches from a Shipper, or to discrete actions taken by the Shipper. Transmix may also be allocated directly to the Shipper for shipments on pipeline segments not mentioned in the list of Points of Accumulation.

Points of Accumulation and Identification of Associated Delivering Line Segments

Transmix collected at Akron (Point of Accumulation) is delivered on the following pipeline segment: (Hudson to Akron).

Transmix collected at Montello (Point of Accumulation) is delivered on the following pipeline segments: (Point Breeze to Montello, Twin Oaks to Montello, and Laurel Pipeline to Montello).

Transmix collected at Buffalo and Rochester (Points of Accumulation) is delivered on the following pipeline segments: (Montello to Buffalo and Rochester; Caledonia to Buffalo and Rochester).

Transmix collected at Delmont (Point of Accumulation) is delivered on the following pipeline segments: (Salem Jct. receipts and Fostoria to Delmont).

Transmix collected at Kingston (Point of Accumulation) is delivered on the following pipeline segment: (Montello to Kingston).

Transmix collected at Fullerton (Point of Accumulation) is delivered on the following pipeline segments: (Point Breeze to Fullerton, and Twin Oaks to Fullerton).

Transmix collected at Newark (Point of Accumulation) is delivered on the following pipeline segments: (Point Breeze to Newark, and Twin Oaks to Newark).

Transmix collected at Linden (Point of Accumulation) is delivered on the following pipeline segments: (Girard Point/Eagle Point via Woodbury to Linden, Point Breeze to Linden and Twin Oaks to Linden).

Transmix collected at Blawnox (Point of Accumulation) is delivered on the following pipeline segment: (Fostoria to Delmont).

Transmix collected at Youngstown (Point of Accumulation) is delivered on the following pipeline segment: (Boardman to Youngstown).

Transmix collected at Eagle Point (Point of Accumulation) is delivered on the following pipeline segment: (Woodbury to Eagle Point)

Transmix collected at Hebert (Point of Accumulation) is delivered on the following pipeline segments: (Beaumont to Hebert, Port Arthur to Hebert and Hebert (Valero) to Hebert)

Transmix collected at Waskom (Point of Accumulation) is delivered on the following pipeline segment: (Hebert to Waskom)

Allocation and Settlement on Pipeline Segments (for all Points of Accumulation other than Eagle Point)

At each Point of Accumulation of transmix listed above, the total Carrier inventory of transmix shall be held in Carrier’s custody for disposal for the account of the Shippers. The allocation of transmix to each Shipper shall be proportionate to the total barrels shipped that month on a delivering pipeline segment to each Point of Accumulation by each Shipper compared to the total volume shipped by all Shippers on that pipeline segment to that Point of Accumulation.

After the transmix is allocated, it may be sold on a bid or contractual basis by the Carrier for the account of Shippers, with each Shipper being credited with the sale proceeds corresponding to the transmix settlement price for the relevant segment(s). The transmix settlement price will take into account the pipeline tariff to the transmix collection point on the relevant pipeline segment, the transportation to the transmix processor, the processing cost, local market adjustments, and other incremental expenses that may from time to time develop. The settlement price for each segment will be determined annually. Additionally the Shipper will be charged the pipeline tariff for the allocated transmix from the relevant origin to the Point of Accumulation.

For those pipeline segments allocated on a volumetric basis, and for pipeline segments for which the generation of the transmix can be readily attributed to specific batches from a Shipper, or which can be attributed to discrete actions taken by the Shipper, the Carrier may allocate the transmix directly to that Shipper.

Transmix Settlement Price Calculation

After the transmix is allocated, it may be sold on a bid or contractual basis by the Carrier for the account of Shippers, with each Shipper being credited with the sale proceeds corresponding to the transmix settlement price for the relevant segment(s). The transmix settlement price will be of the form:

$(A \times \text{CBOB gasoline price} + (1-A) \times \text{ULSD price}) - \text{the transmix adjustment}$;

where A is the fraction of gas in the transmix pricing and 1-A is the fraction of diesel.

The transmix adjustment will take into account the transportation to the transmix processor, the processing cost, local market adjustments, and other incremental expenses that may from time to time develop.

Point of Accumulation	A	1-A	Transmix Adjustment (\$/barrel)
Akron	0.46	0.54	13.34
Blawnox	0.40	0.60	11.63
Buffalo	0.35	0.65	14.01
Delmont	0.40	0.60	11.63

Fullerton	0.35	0.65	16.98
Hebert	0.35	0.65	15.96
Kingston ^A	0.35	0.65	16.28
Linden ^A	0.35	0.65	18.90
Montello	0.35	0.65	16.30
Newark ^A	0.35	0.65	16.30
Rochester	0.35	0.65	14.85
Youngstown	0.35	0.65	11.24
Waskom	0.27	0.73	10.50

^A ~~Buffalo~~, Kingston, Linden, and Newark transmix settlement price based on heating oil.

Allocation and Settlement for Deliveries to Eagle Point

All transmix generated on the Woodbury to Eagle Point pipeline segment will be temporarily held in Carrier’s custody for the duration of each cycle. At the end of each cycle, transmix will be allocated to each Shipper proportionately to the total barrels shipped that cycle on the Woodbury to Eagle Point pipeline segment.

After the transmix is allocated, it will be transferred to the transmix inventory of the shipper at Eagle Point and the Shipper will be charged the pipeline tariff for the allocated transmix from the relevant origin to Eagle Point. The shipper will be responsible for disposition of the transmix at Eagle Point.

Ex.

Ticketed Volume into Eagle Point		
	Ticketed Product	
	Origin A	Origin B
Shipper A	20,125	
Shipper B	15,780	
Shipper C	10,200	5,001
Shipper D		8,620
Shipper E		6,400
Total Product	46,105	20,021
Generated Transmix	692	200

5001 / 20021 = ~25%

Transmix Allocations		
Shipper A	302	-
Shipper B	237	-
Shipper C	153	50
Shipper D	-	86
Shipper E	-	64
Total Transmix	692	200

200 * 25% = 50