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February 2, 2019

**VIA ELECTRONIC FILING**

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

**Re: REBECCA BRITTON v. Sunoco Pipeline L.P.; Docket No. C-2019-3006898  
ANSWER To SPLP's PRELIMINARY OBJECTIONS**

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission is Rebecca Britton's Response to Preliminary Objections.

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

Very truly yours,

A handwritten signature in black ink that reads "Rebecca Britton". The signature is written in a cursive, flowing style.

Rebecca Britton *pro se*

**BEFORE THE PUBLIC UTILITY COMMISSION**

<b>REBECCA BRITTON</b>	:	
Complainant,	:	
V.	:	Docket No. C-2019-3006898
<b>SUNOCO PIPELINE L.P.</b>	:	
Respondent.	:	

**ANSWERS TO PRELIMINARY OBJECTIONS OF SUNOCO PIPELINE L.P.**

I, Rebecca Britton (the Complainant), pursuant to 52 Pa. Code § 5.101(f)(1), respectfully file this Answer to Preliminary Objections of Sunoco Pipeline L.P., and present the following:

**I. INTRODUCTION**

I.       **Denied. Denied.** The Preliminary Objections made by Respondent should be stricken in its entirety. When the sustaining of defendants’ preliminary objections will result plaintiffs’ claim, or a dismissal of plaintiff’s’ suit, preliminary objections should be sustained only in cases which are clear and free from doubt.” Dana Perfumes Corp. v. Greater. Wilkes-Barre Indus. Fund, Inc., 375 A.2d 105 (Pa. Super 1977) (quoting Borelli v. Barthel, 211 A.2d 11, 14 (1965)).

Preliminary objections “should be sustained only where it appears with certainty, upon the facts averred, the law will not allow the plaintiff to recover.” *Id.* (quoting *International Union of Operating Engineers v. Linesville Construction Co.*, 322 A.2d 353, 356 (Pa. 1974). “[W]here any doubt exists, that doubt should be resolved by a refusal to sustain the preliminary objections.” *P.J.S. v. Pennsylvania State Ethics Com’n*, 669 A.2d 1105, 1108 (Pa. Cmwlth. 1996) (quoting *J.B. Steven, Inc. v. Board of Commissioners of Wilkens Township*, 643 A.2d 142, 144 (Pa. Cmwlth. 1994), appeal denied, 652 A.2d 841 (Pa. 1994)). Throughout the Response, Respondent alleges, “Complainant relies on scientific assertions, opinions, and alleged facts which are not supported by any expert verification. See Complaint at Paragraphs G, H, L, 1, 3, 4, 6, 10, 15, 16, 17, 25, 29, 30, 32, and Relief Requested 3, 11, and 12.” When in fact, Complainant avers that she is a non expert, nor is political subdivisions in pipeline safety, risk, public awareness (appropriate for NGL’s), or pipeline siting and any avertments made are brought before, Your Honor, as they conform with Title 66, § 701. *Complaints*. The commission, or any person, corporation, or municipal corporation having an interest in the subject matter, or any public utility concerned, may complain in writing, setting forth any act or thing done or omitted to be done by any public utility in violation, or claimed violation, of any law which the commission has jurisdiction to administer, or of any regulation or order of the commission. Including Title 66 § 1501 *Character of service and facilities*. Every public utility shall furnish and maintain adequate, efficient, safe, and reasonable service and facilities, and shall make all such repairs, changes, alterations, substitutions, extensions, and improvements in or to such service and facilities as shall be necessary or proper for the accommodation, convenience, and safety of its patrons, employees, and the public. Furthermore, in *Feingold v. Bell of Pennsylvania* 477 Pa. 1

(1977) 383 A.2d 791 This Court recognized and applied the general rule requiring a petitioner to exhaust all available administrative remedies before seeking judicial redress for an alleged wrongdoing by a public utility. See, e.g., *Commonwealth v. Glen Alden Corp.*, 418 Pa. 57, 210 A.2d 256 (1965); *Collegeville Borough v. Philadelphia Suburban Water Co.*, 377 Pa. 636, 105 A.2d 722 (1954). The rationale behind this rule is clear. When the Legislature has seen fit to enact a pervasive regulatory scheme and to establish a governmental agency possessing expertise and broad regulatory and remedial powers to administer that statutory scheme, a court should be reluctant to interfere in those matters and disputes which were intended by the Legislature to be considered, at least initially, by the administrative agency. Full utilization of the expertise derived from the development of various administrative bodies would be frustrated by indiscriminate judicial intrusions into matters within the various agencies' respective domains.[3]See *Colteryahn Sanitary Dairy v. Milk Control Commission*, 332 Pa. 15, 1 A.2d 775 (1938), construing, Act of March 21, 1806, P.L. 558, 46 P.S. § 156, consolidated by, Act of Nov. 2, 1970, P.L. 707, No. 230, 1 Pa.C.S. § 1504 (Supp. 1977-78); *Commonwealth v. Glen Alden Corp.*, supra. Respondent alleges verification was not made by Complainant under 52 Pa. Code § 1.36; however, averments of facts must only be *personally* verified and I was happy to affirm the verification form.

2. **Denied. Denied.** The Respondent alleges, in the alternative, portions of the preliminary objections that; portions of my complaint should be stricken pursuant to 52 Pa. Code § 5.101(a)U) for lack of Commission jurisdiction over the allegations. Title 66 § 1501 designates the PA PUC as the administrative body responsible to determine safe, adequate, and reasonable

service to the public. **Denied.** Respondent alleges that the Commission cannot hear a complaint outside of their jurisdiction. The Complaints avers the Commission can hear this complaint; and, matters before the court fall squarely in its' jurisdiction. In this case Title 66 § 1501; and the Commission is a state agency meant to uphold state laws, including but not limited to, the PA Constitution, thereby protecting the public. **Denied.** The complaint seeks **no** relief that includes a “pseudo-appeal” of a separate agency action. The relief being sought should be a matter of public record in the form of; study, created materials, and/or other material documents that should have been admitted as evidence in this answer, thereby dismissing my complaint for satisfaction of claim. Respondent could have satisfied this complaint with supportive evidence meeting the, Formal Complaint Notice to Respondent to Answer or Satisfy, served to Respondent Jan 4, 2019. Complainant meets all requirements under 52 Pa. Code § 5.21. Therefore, Complaint Paragraphs G, H, J, M, N, 2, 5, 8, 11, 15-28, 29-31, 34, 36-38, 40-46, 49, and Relief Requested 1, 6-10, 13, and 14 should *not* be stricken.

3. **Denied. Denied.** Portions of the Complaint should not be stricken pursuant to 52 Pa. Code § 5.101(a)(7). Respondent must not have conducted a reasonable investigation. Complainant has standing. A reasonable investigation would conclude that each school Complainant's children will attend are in the geographical region of Uwchlan Township. Furthermore, Complainant's children are currently enrolled in Lionville Elementary, which is located on a 'campus like setting' co-located with Lionville Middle and Downingtown East High School. Thus, K-12, my children *will*, and already do, attend school in “probable impact radius”. My eldest child is currently enrolled in the 3rd grade and will be attending the Marsh Creek 6th

Grade Center in the near future. It would be unduly burdensome to courts, respondent and complainant to revisit Relief Requested in 12. Complaint at Paragraph G (emphasis added). The Respondent alleges paragraphs to be stricken include G-I, L, N, 3, 4, 6, 9, 12, 13, 30-32, 35, 38, 39, 46, 47, 49, and Relief Requested 4, 5, and 12 all make allegations regarding areas disconnected from the geographic area surrounding Complainant's residence; however, this is **denied**. After a reasonable search, Respondent would have found *all* schools brought forth in my complaint are located both in my political subdivision of Uwchlan Township; and the geographical boundaries of the Downingtown Area School District, of which I am a taxpayer. The Marsh Creek Lake and headwaters are my designated water resource in times of resource scarcity as presented in Exhibit 7 of my Complaint. All averments and evidence are pertinent to the the material questions presented before the court. Respondent is making conclusions of law unsubstantiated by material evidence to satisfy. Respondent's 7 lawyers are not experts in NGL's, public awareness, adequacy of cell phones and NGL's, evacuations, public safety, parenting, preparation of children for hazards, water scarcity, valves, school siting, and state insurance policies. Nor are they, experts, at understanding the effects to me, the property owner, taxpayer, and citizen; should Mariner East Pipeline System have a release with or without ignition. **Denied**. Complainant does have standing to bring claims for avertions. Complainant should not have standing over other individuals, schools or entities, nor, am I attempting to seek such relief. The issues presented in complaint, including, the number of people who currently rely on inadequate study and proper public awareness; have everything to do with the material questions before the court. **Denied**. Respondent incorrectly alleges questions before the court have "nothing to do with the Complainant's property". It is the totality of risk to my personal

property and personal use of community resources that have the “*discernable effect*” on Complainant. Likewise, hazards that have the potential effect of harming large populations puts undue burden on emergency services; and, thus creates situations where the ability to respond efficiently and effectively by emergency services personnel makes these material questions before the court *pertinent and substantial*. These avertments made by me are based on common sense “good judgement”; all citizens should undertake for emergency readiness securing life and property as part of their Constitutional Rights; and, emergency services agencies, both state and federal, devote resources to citizen preparedness for same reasons. Likewise, a release of NGL’s to water supplies that relate to public water consumption would have a substantial effect on my family should we have to compete for water resources with thousands of other Chester County and state of Delaware residents. Complainant shops. (Target, 180 Eagleview BLVD Exton PA. Giant, 168 Eagleview BLVD, Exton PA.) Both stores are approximately 1 mile from my home. Both stores are straddled by the 8 inch and 12 inch line, and approximately, within a 1000 feet, from the front and back of stores perspective. Accordingly, Complainant further has a *requisite immediate, direct, and substantial interest* to bring a Complaint regarding those areas of Uwchlan Township. **Denied.** Respondent claims the relief in this proceeding should be limited based on Complainants’ geographic standing. As Your Honor recognized in DiBernardino v. Sunoco Pipeline L.P., Order Granting In Part And Denying In Part Preliminary Objections To Amended Complaint at 11 (Order entered Dec. 21, 2018) (Barnes, J.), “Complainant does not have standing to represent other individuals, schools or entities.” In that proceeding, Your Honor, limited the relief requested to the Township in which Complainant resides, and Your Honor can make the same argument here. The material matters before the court and relief sought

is inherently different from Mrs. DiBernardino, thus allowing my averments and evidence, and applying same reasonableness of, her Honors, original decision. Furthermore, in the same ruling, Your Honor, agrees with Mrs. DiBernardino allowing evidence to be presented from statewide concerns over Mariner East System; and Your Honor, should do the same here. *Id.* Accordingly, Complaint paragraphs G-I, L, N, 3, 4, 6, 9, 12, 13, 30-32, 35, 38, 39, 46, 47, 49, and Relief Requested 4, 5, and 12 should *not* be stricken.

4. **Denied. Denied.** Paragraphs 1-3 and Relief Requested 1 should not be stricken. Respondent alleges that pursuant to 52 Pa. Code § 5.101(a)(4) that these paragraphs lack legal sufficiency of a pleading. However, Complainant makes averments regarding early warning systems under CFR 195.440, that is supported by rule of law. These “rules” are *the* material question before the court. Determining both adequacy and reasonableness of the utility. **Denied.** Furthermore, Respondent alleges that, (compliantant) “at the same time avering that the regulation “does not say specifically that, SPLP must have an early warning system for the public.” See Complaint Paragraph 2. Complainant then goes on to request relief that the Commission determine “...if service is safe, and reasonable to the public, without a SPLP created early warning system...”. This relief is legally *sufficient* because of Complainant’s relief sought is part of the statutory and regulatory powers of the commission. *Id.* PA Title 66 Section 1501; and moreover, 52 Pa. Code 59.33 which reads: Each public utility shall at all times use every reasonable effort to properly warn and protect the public from danger, and shall exercise reasonable care to reduce the hazards to which employees, customers and others may be subjected to by reason of its equipment and facilities. It is therefore, **denied**, that admissions in



the pleading and the lack of regulatory requirement for such alarm system have been determined as adequate, safe, and reasonable. Accordingly, Complaint Paragraphs 1-3 and Relief Requested 1 should *not* be stricken.

5. **Denied. Denied.** Exhibit 2, attached to my complaint, should not be stricken as it includes pertinent averments to the matter. Allegations that the, Exhibit 2, fail to conform to 52 Pa. Code § 5.101(a)(2) are unsupported; and, should be dismissed by, Your Honor, because said allegations are legally insufficient. Complainant's Exhibit 2 contains a SPLP "Emergency Response Procedures Manual" for a pipeline in Sarnia, Ontario, Canada. This manual was prepared by same operator, same pipeline contents, under same pressure, and for pipeline with same pipe diameter as Mariner East 1. A reasonable conclusion, made with commonsense, *alone*, indicates that NGL's behave the same way in Sarnia, ON, Canada as they do in Chester County, Pennsylvania. Respondent alleges that document was prepared under the laws, regulations, and requirements of a foreign nation and its contents have no bearing on Complainant's claim. However, this allegation is **denied**. Complainant's Exhibit 2 is pertinent matter; because, when the court is answering the questions before the court, the court requires data that is not "*bias or injurious*" to Sunoco Pipeline LP. Documents prepared by SPLP cannot be *injurious* or *bias* to themselves. Furthermore, the responsible party for carrying out emergency operations in this document is the Chemical Valley Emergency Coordinating Organization, commonly known as CVECO. It is, **denied**, that the document is not used for US emergency response agencies; as a reasonable search of Google will yield a document on

Michigan.gov<sup>1</sup> website declaring that St. Clair County, Port Huron, Michigan is amongst the first responders tasked with response under mutual aid agreements. CVECO website confirms same agreement.<sup>2</sup> It is therefore, **denied**, that this document has no basis in a complaint under the PA Public Utility Code, or even U.S. Federal Pipeline Regulations. Complainant's Exhibit 2 should *not* be stricken as it includes pertinent matter that can form the basis of any finding on this Complaint.

## II. **Argument**

### A. **Legal Standard**

6. **Denied.** Conclusion of law. Requires no response.

7. **Denied.** Respondent alleges, “the pleaders, conclusions of law, unwarranted inferences from facts, argumentative allegations of expressions should not be considered to be admitted as true. *Id.* The preliminary objections should be stricken if, based on the facts averred by the plaintiff, the law says with certainty that no recovery is possible. *Solo v Nabisco, Inc.*, 32 A.3d 787, 790 (Pa. Super. Ct. 2011). appeal denied, 50 A.3d 126 (Pa. 2012).” Respondent has not demonstrated, based on facts, with certainty that no recovery is possible. Alternatively, A party need not wait to experience harm before its position may be fully heard in a proceeding before

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<sup>1</sup> Link to website demonstrating cross border cooperation

[https://www.michigan.gov/documents/mpscs/Blue\\_Water\\_Bridge\\_NoVideo\\_Publish\\_499227\\_7.pdf](https://www.michigan.gov/documents/mpscs/Blue_Water_Bridge_NoVideo_Publish_499227_7.pdf)

<sup>2</sup> <http://www.caer.ca/cveco/>

the Commission. See, Lehigh Valley Power Committee v. Pa. PUC, 593 A.2d 1333, 1336-1337 (Pa. Cmwlth. 1991). The Complainant makes no, argumentative allegations. The Complaint only avers issue, cites law, and offers factual matters of public record as supportive evidence pertinent to the matter. The only relief sought in my complaint asks for the Commission to determine, *if*, services are safe, adequate, and reasonable. Failure to hear this pleading could result in harm if not fully heard in a proceeding before the Commission and, therefore, should move forward in a timely fashion.

**B. Preliminary Objections Warranting Complete Dismissal**

1. **Denied. Respondent's Preliminary Objection 1: The Preliminary Objections filed by SPLP fails to conform with the governing rules of answers to satisfy § 5.24. Satisfaction of formal complaints.**

8. **Denied.** The Respondent's preliminary objections should be stricken in its entirety. The Respondent relies on conclusions of law, opinions, and allegations that are not supported by any expert verification. See Complaint at Paragraphs G, H, L, 1, 3, 4, 6, 10, 15, 16, 17, 25, 29, 30, 32, and Relief Requested 3, 11 and 12. Also see supportive evidence of Complaint averments, these are documents issued by PA PUC, Chester County Political Subdivisions, and other government agencies; *all*, tasked with protecting the health, welfare and safety of public. Any averments in these documents must be regarded as, fact, written by experts. These paragraphs form the very

basis of the Complaint and are matters of public record.

9. **Denied.** Complainant is a lay person, not an expert in pipeline safety. That is why complainant filed said complaint with PA PUC, “the experts”. *Id.* Feingold v. Bell of Pennsylvania 477 Pa. 1 (1977) 383 A.2d 791. **Denied.** Respondent claims that, “any avertments used for the basis of my Complaint require expert verification.” The very basis of my complaint is avertments in public document by “experts”. The very basis of my complaint is the absence of any “found” state conducted study and subsequent hazard planning materials; rendering pipeline *safe* for the public. Should Respondent have this expertly verified material they should produce them now for, Your Honor, to review, thereby dismissing my complaint for satisfaction.

10. **Denied.** Therefore, the Complaint should *not* be dismissed pursuant to 52 Pa. Code § 5.24.

**C. In the Alternative, Portions of the Preliminary Objections Should be Stricken.**

**2. Denied. Complainants Response to Objection 2: Portions of the Preliminary Objections from SPLP should be stricken for § 5.61. Answers to complaints, petitions, motions and preliminary objections. (3) Admit or deny specifically all material allegations of the complaint; and (4) State concisely the facts and matters of law relied upon.**

11. **Denied. Denied.** Respondent alleges, incorrectly, Pursuant to 52 Pa. Code § 5.10 l(a)(1); that portions of the Complaint should be stricken because the law is clear and free from doubt that the Commission does not have jurisdiction over the allegations. Commission does have jurisdiction pursuant to Id. PA Title 66 §1501, Title 66, § 701 and 52 Pa. Code 59.33. Furthermore, Id. Feingold v. Bell of Pennsylvania 477 Pa. 1 (1977) 383 A.2d 791. Complainant does aver concerns that various Health and Safety Statutes and Regulations, various Environmental Statutes, Regulations, and Public Use of Lands have been violated. I do aver concerns for violations of School Code. **Denied.** Complainant does *not* allege generally the duties of any state agency. I do cite “rule and fact”. I do aver concerns for violations of the US Title 44. **Denied.** I do not allege general duties of said agencies with oversight. I do cite “rule and fact”. I do aver concerns for lack of study regarding water supplies, public lands, and school siting. **Denied.** I do NOT ever ask, Your Honor, to require another state agency to act. I only ask PA PUC to determine if service is safe, adequate, and reasonable given fact and rule. If documentation exists to support SPLP’s allegations that service is compliant under *Id.* PA Title 66 §1501, Title 66, § 701 and 52 Pa. Code § 59.33 in support of meeting Title 35 requirements, Respondent, should produce them now and satisfy complaint.

12. **Admitted.** Respondent avers, for complaints, 66 Pa. C.S. § 701 provides.

*The commission, or any person, corporation, or municipal corporation having an interest in the subject matter, or any public utility concerned, may complain in writing, setting forth any act or thing done or omitted to be done by any public utility in violation,*

*or claimed violation, of any law which the commission has jurisdiction to administer, or of any regulation or order of the commission.*

Respondent avers (Administrative agencies are creatures of the legislature and have only those powers which have been conferred by statute.). The Commission only has the power to entertain complaints by third parties against “public utilities” within the powers granted to it by the General Assembly; and *Complantant completely agrees.*

13. **Denied. Denied.** The Commission does have jurisdiction over complaints regarding the safe, reasonable, and adequateness of service regarding public utilities. Regarding the Health and Safety Statutes and Regulations cited, the Environmental Statutes and Regulations and the Public Use of Lands cited, or other agency or entity actions the Commission can not *enforce*. However, Your Honor, *if*, these above mentioned Statutes and Regulations have been complied with then there should be, evidence for, Your Honors, review. These documents should be part of the public record supporting safety, reasonableness, and adequacy of service. **Denied.** SPLP has/had requirements under 49 CFR 195.440 and should have presented avered state agencies, political subdivisions and emergency response organizations with adequate information and awareness to provide for Complainant's Constitutional rights under Articles § § 1, 25, 26, 27.

14. **Denied. Denied.** Respondent alleges, the processes, decisions, and management of these other state agencies, political subdivisions, and emergency response agencies are completely outside the control of SPLP. SPLP has been transporting NGL’s since December 2014. SPLP has had ample time to help create the appropriate processes, decisions, and management with

“these other state agencies, political subdivisions, and emergency response agencies”. Title 35 has provisions for this cooperation. Specifically, Title 35 part III § 7313 (12) (PEMA powers and duties) To cooperate with the Federal Government and any public or private agency or entity in achieving any purpose of this part and in implementing programs for disaster prevention, preparation, response and recovery. Title 35 § 7305 (7) (Powers and duties of political subdivision) Cooperate and coordinate with any public and private agency or entity in achieving any purpose of this part.

15. **Denied. Denied.** Respondent alleges complaint Paragraphs G, H, J, M, N, 2, 5, 8, 11, 15-28, 29-31, 34, 36-38, 40-46, 49, and Relief Requested 1, 6-10, 13, and 14 should be stricken because the Commission lacks jurisdiction over the statutes or regulations averred violated, the subject matter of portions of the complaint, or other entities actions. Complainant does not ask the Commission in relief to do anything, but, rule on *Id*, Title 66 § 1501 and 52 code § 59.33.

**3. Denied. Preliminary Objection 3: Complainant avers that all of Respondents objections are argumentative, and legally insufficient.**

16. **Denied.** Complainant maintains Respondents objections should be stricken. Complainant only avers safety issues to her family; water scarcity, and financial impacts to property value; including school & land tax impacts from release of NGL’s both ignited or unignited. Averred safety issues are compounded by dense populations unaware and ununiformed of risks, these are not abstract interests of the public and do not relate to the area outside of Uwchlan Township

physical boundaries; with, the exception of the area where Complainant's water reservoir is located and the public lands in the state park she has rights to. Complainant does not raise concerns on behalf of other entities including schools and political subdivisions. Complainant's concerns are based on her, and her families, compounded risks to unmitigated hazards on shared community resources that could be injurious to her property value if impacted. Furthermore, her concerns of financial losses to her property, home value, as well as, loss of life and injury to her children and self. See Complainant's Response to Preliminary Objections 1-15.

17. **Denied.** Complainant has a direct, immediate, and substantial interest which is distinguishable from the general public and meets the criteria set forth under 66 Pa.C.S. § 701.

18. **Denied.** Complainant has a direct, immediate, and substantial interest in the subject matter of the controversy; as a parent, homeowner, tax payer, and citizen. Respondent answers in preliminary objections to my complaint fail to comply with the standards set forth in PA 52 code § 5.61 (b)(3). Admit or deny specifically all material allegations of the complaint.; and (4) State concisely the facts and matters of law relied upon.

19. **Denied.** Complainant's family resides 450 feet from co-located 8 and 12 inch lines and planned route of 2x. Complantant's children both attend school within probable impact radius. Complantant shops at Target and Giant located 1000 feet from both the 8 and 12 inch lines in seperate easements. Complainant's children play sports and use the following locations for recreational purposes; Acker Park, Bauman Circle Exton PA approximately .2 miles from my



home; approx. 250 feet from 8 and 12 inch line; and Lionville Park, 34 Devon Dr approximately .5 miles from my home; 12 inch lines runs through the park; and Lionville Elementary School Park in school yard. Complainant uses public library, Chester County Library, 450 Exton Sq. Parkway, Exton PA; 8 and 12 inch lines on the property; and shops located at Exton Square Mall located approximately 450 feet from 8 and 12 inch lines. Complainants water supply is in headwaters of marsh creek marsh and water reservoir. Complaint uses trails for outdoor activities Uwchlan Township Struble Trail(Uwchlan Township), Uwchlan Trail(Uwchlan Township), and Marsh Creek State Park; and, all traverse the ME system; and, given Complaint paragraphs H-M, my needs are direct, immediate, and substantial. Virtually 24 hr a day risk to myself and my family. Risks to my “taxes paid for” community resources, consumer paid for public water and my home values are all impacted by issues raised in complaint.

20. **Denied.** Conclusions of law. No further response required.

**4. Denied. Respondent fails to recognize other portions of said paragraphs; SPLP has a duty to CFR 195.440 and PA Agencies and Political Subdivisions have the duty and powers to work with SPLP for achieving purposes of warning and informing the public. This was successfully demonstrated in my complaint through, rule and fact, and every item should be admitted. Denied. Relief should be granted in all sections of my petition as a parent, a taxpayer and a consumer.**

21. **Denied.** Conclusion of law. No further response required.

22. **Denied.** Conclusion of law. No further response required.
23. **Denied.** Conclusion of law. No further response required.
24. **Denied. Denied.** High density populations exposed to risk are material to the questions before the court; as they lead to my family being exposed to more danger. Complainant's needs are *direct, immediate, and substantial interest*; which is, *distinguishable* from the general public and meets the criteria set forth under 66 Pa.C.S. § 701.
25. **Denied.** Conclusion of law. No further response required.
26. **Denied.** Conclusion of law. No further response required.

### **III. Conclusion**

*Wherefore*, Complainant respectfully requests that the Preliminary Objections be dismissed in its entirety. In the alternative, Complainant respectfully requests that all portions of the relief requested and evidentiary portions of Complaint be admitted.

Respectfully submitted,



Rebecca Britton

Dated 2/02/19

**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 via electronic filing:

***VIA ELECTRONIC FILING***

Pennsylvania Public Utility Commission  
efiling system

Thomas J. Sniscak, Esq  
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Rebecca Britton  
211 Andover Drive  
Exton, PA. 19341

Dated: February 2, 2019

## VERIFICATION

I, Rebecca Britton, hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

A handwritten signature in black ink that reads "Rebecca Britton". The signature is written in a cursive, flowing style.

Rebecca Britton

February 2, 2019