

April 18, 2019

Via Electronic Filing

Rosemary Chiavetta, Esquire
Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Docket Nos. P-2018-3006117 and C-2018-3006116
Megan Flynn et al. v. Sunoco Pipeline, L.P.
Prehearing Memorandum of The County of Chester**

Dear Secretary Chiavetta:

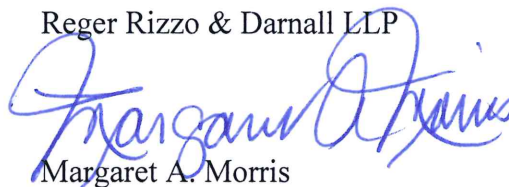
Attached for filing is the Prehearing Conference Memorandum of The County of Chester in the above referenced proceeding.

A copy of the Memorandum has been forwarded to the parties in the manner indicated on the attached Certificate of Service.

If there are any questions, please contact me.

Very truly yours,

Reger Rizzo & Darnall LLP



Margaret A. Morris

MAM/lam
Attachment

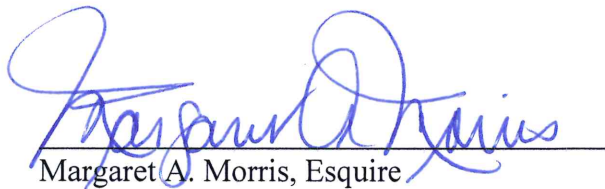
cc: The Hon. Elizabeth Barnes, Pennsylvania Public Utility Commission [w/enc.]
Thomas L. Whiteman, Esquire, Chester County Solicitor's Office [w/enc.]
Service List [w/enc.]

**Re: Docket Nos. P-2018-3006117 and C-2018-3006116
Megan Flynn et al. v. Sunoco Pipeline, L.P.
Prehearing Memorandum of The County of Chester**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served upon the following person(s) on the attached list, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Dated: April 18, 2019


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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Meghan Flynn et al.	:	
	:	C-2018-3006116
v.	:	P-2018-3006117
	:	
Sunoco Pipeline, L.P.	:	
	:	
Melissa DiBernardino	:	
	:	
v.	:	C-2018-3005025
	:	
Sunoco Pipeline, L.P.	:	
	:	
Rebecca Britton	:	
	:	
v.	:	C-2019-3006898
	:	
Sunoco Pipeline, L.P.	:	
	:	
Laura Obenski	:	
	:	
v.	:	C-2019-3006905
	:	
Sunoco Pipeline, L.P.	:	

**PREHEARING CONFERENCE MEMORANDUM OF
THE COUNTY OF CHESTER**

Pursuant to the Prehearing Conference Order (*Order*) of the Honorable Elizabeth H. Barnes dated, March 20, 2019, and Commission regulations at 52 Pa. Code §5.222, the County of Chester (Chester County) submits the following in response to Paragraph 2 of that *Order*.

a.) *Service on Chester County*

Chester County requests that Margaret A. Morris, Esquire, be listed on the service list on behalf of Chester County. The contact information for Ms. Morris is provided below:

Margaret A. Morris, Esquire
Reger Rizzo & Darnall LLP
Cira Centre, 13th Floor
2929 Arch Street
Philadelphia, PA 19104
(215) 495-6524 (tel.)
(215) 495-6600 (fax)
mmorris@regerlaw.com

Chester County agrees to receive service of documents electronically in this proceeding.

b.) *Possible Settlement*

Chester County is always willing and open to pursue settlement discussions to either fully resolve the matter through settlement, to reach a partial settlement, or to reduce the facts at issue in this case through stipulation.

c.) *Discovery schedule*

Chester County anticipates conducting discovery and is agreeable to any reasonable proposed schedule.

d.) *Other proposed orders with respect to discovery*

Chester County does not envision any issues so long as Sunoco timely responds to discovery with requested information.

e.) *Site view*

Chester County strongly supports a site visit of the affected public gathering places located in the County.

f.) *Proposed Litigation Schedule*

Chester County is agreeable to any reasonable proposed litigation schedule.

g.) ***Witnesses and scope of testimony.***

Chester County will offer the following witnesses but reserves the right to call any additional witnesses as discovery and other matter develop prior to the hearing and based on issues identified by the parties:

- **William Turner**
Deputy Director for Emergency Management
Chester County Department of Emergency Services
601 Westtown Road, Suite 012
West Chester, PA 19380
(610) 344-5011
wturner@chesco.org

Scope of testimony:

Mr. Turner will offer testimony regarding Chester County's obligation for emergency preparedness.

- **Expert witness**
Chester County is in the process of retaining an expert witness and will provide the contact information to the parties as soon as practicable

Scope of testimony:

The expert will offer testimony regarding Chester County's obligation to have in place an emergency preparedness plan that complies with all regulatory standards.

h.) ***Issues and sub-issues to be addressed by Chester County***

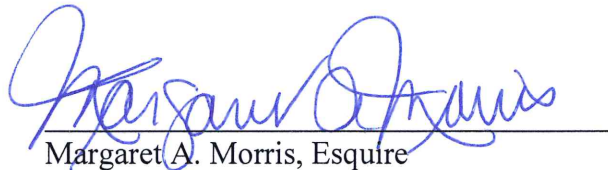
- *Consolidation of Complaints*
 - Chester County takes no position.
- *Petitions to Intervene*
 - Chester County has a pending Petition which should be granted.
- *Protective Order*
 - Chester County supports the use of Protective Order for legitimate confidential/proprietary information.
- *Public Awareness/Emergency Preparedness*
 - Chester County will only address Emergency Preparedness issue through its witnesses.
- *Location of pipelines close to dwellings and public gathering places.*
 - Chester County will address this issue through its witnesses.

i.) Proposed evidence.

- Chester County will provide testimony related to its obligations and its inability to comply due to lack of requested information.

Respectfully submitted,

Dated: April 18, 2019



Margaret A. Morris, Esquire

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