

Rebecca Britton
211 Andover Dr.
Exton PA 19341

October 11, 2019

VIA ELECTRONIC FILING

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

Re: Rebecca Britton v. Sunoco Pipeline L.P.; Docket No. C-2019-3006898

Meghan Flynn. et al. v. Sunoco Pipeline L.P.; Docket Nos. C-2018-3006116 and
P-2018-3006117;

REBECCA BRITTON'S APPLICATION FOR SUBPOENA

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission is Rebecca Britton's application for Subpoena for Uwchlan Township Police Chief Scott Alexander, Uwchlan Township Fire Marshall Mike Holmes and Chester County Deputy Director of Emergency Services William Turner.

If you have any questions regarding these filings please do not hesitate to contact me.

Very Truly Yours,



Rebecca Britton
Pro se
October 11, 2019

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

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Rebecca Britton :
211 Andover Dr. :
Exton, PA 19341 : Docket No. C-2019-3006898
Complainant :

Consolidated :
MEGAN FLYNN *et al* : **Docket Nos.C-2018-3006116**

v. :

SUNOCO PIPELINE L.P., :
Respondent. :

:

Notice to Respond or Object

The Pro Se Complainant, Rebecca Britton, has filed an application for a subpoena in accordance with Pa Code 52 § 5.421.

While I am not anticipating objections as none of these witnesses have been objected to from my original list I am required to provide notice to respond. I would ask that any responses are within 7 days in accordance with Judge Barnes prehearing conference order.

Respectfully Submitted,



Rebecca Britton

October 11, 2019

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Rebecca Britton :
211 Andover Dr. :
Exton, PA 19341 : **Docket No. C-2019-3006898**
Complainant :

Consolidated :
MEGAN FLYNN *et al* : **Docket Nos.C-2018-3006116**
v. :

SUNOCO PIPELINE L.P., :
Respondent. :

Judge Barnes,

Please accept my application in writing for the following 3 subpoenas to be issued; Uwchlan Township Police Chief Scott Alexander, Uwchlan Township Fire Marshall Mike Holmes and Chester County Deputy Director of Emergency Services William Turner.

Uwchlan Township Police Chief Scott Alexander

- 1) Chief Scott will testify to the factual matters related to emergency response, emergency response capabilities, roles and responsibilities of police, police equipment, and general accounting of facts as it relates to policing the Township of Uwchlan.
- 2) I do not require Chief Scott to bring any documents with him.
- 3) I have included a notice to object or respond and served it on all parties. I am pleading with your honor that if it is appropriate she consider expediting this request so as to allow for response if one is needed.
- 4) Chief Alexander can be reached via his place of business

Uwchlan Township Police Dept.
717 N. Ship Rd.

Exton PA 19341
Ph: 610-363-6947
Fx: 610-524-1088

Uwchlan Township Fire Marshal Michael Holmes

- 5) Mr. Holmes will testify to the factual matters related to emergency response, emergency response capabilities, roles and responsibilities for himself and those in the fire dept, fire equipment, and general accounting of facts as it relates to preparation, response and recovery for emergency response in the Township of Uwchlan.
- 6) I do not require Mr. Holmes to bring any documents with him.
- 7) I have included a notice to object or respond and served it on all parties. I am pleading with your honor that if it is appropriate she consider expediting this request so as to allow for response and ruling if that is needed.
- 8) Fire Marshal Holmes can be reached via his place of business

Uwchlan Township
715 N. Ship Rd.
Exton PA 19341
Ph: 610-363-9450
FX: 610-363-0518

Chester County Deputy Director of Emergency Services William Turner

- 9) Mr. Turner will testify to the factual matters related to emergency response, emergency response capabilities, roles and responsibilities of Chester County Dept of Emergency Services and himself, available equipment, and a general accounting of facts as it relates to the level of preparedness, response and mitigation of Mariner East. Testify to information presented to county by SPLP.
- 10) I do not require Mr. Turner to bring any documents with him.
- 11) I have included a notice to object or respond and served it on all parties. I am pleading with your honor that if it is appropriate she consider expediting this request so as to allow for response if one is needed.
- 12) Mr. Turner can be reached via his place of business

County of Chester
313 West Market Street
West Chester, PA 19380
610-344-5011
wturner@chesco.org



Rebecca Britton

October 11, 2019

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

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Honorable Elizabeth Barnes
ebarnes@pa.gov



Rebecca Britton
Pro se
October 11, 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).



Rebecca Britton
Pro se
October 11, 2019

