

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Melissa DiBernardino, Complainant	:	
v.	:	
Sunoco Pipeline, L.P. a/k/a Energy Transfer, Respondent	:	Docket No. C-2018-3005025
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**PRE-HEARING MEMORANDA OF MELISSA DIBERNARDINO**

**I. Introduction**

Judge Barnes ordered a pre-hearing conference for February 13, 2019. The following is information that I believe will be discussed during this conference call.

**II. Issues and Sub-issues**

- A. Horizontal Directional Drilling- the lack of studies/ information and the potential impacts it has on public health and safety.
- B. Coating and weld issues
- C. Sunoco’s egregious behavior, disregard for safety and their violations and investigations.
- D. Lack of adequate emergency planning and public awareness now 4 years into operations.
- E. Pipeline installation in potentially unstable soil.
- F.

### **III. Consolidation of Cases**

I am open to consolidation with certain existing complaints.

### **IV. Petitions to Intervene**

Thomas Casey

Caroline Hughes

Virginia Marcille-Kerslake

### **VIII. Witnesses**

I reserve the right to call expert witnesses for pipeline integrity, pipeline safety, emergency response and anything else that will help prove my concerns in the future.

### **X. Site Visits**

It is my understanding that site visits are an option and up to her honor, Judge Barnes, to possibly visit the area of concern. The opportunity for her honor to come to East Goshen Township and visit Saints Peter and Paul School would be greatly appreciated and very beneficial/informative in this matter.

### **XI. Discovery**

I have almost completed my lists of documents/information I will be requesting/subpoenaing from Sunoco/Energy Transfer and other agencies and organizations.

### **XII. Procedural Schedule**

I will cooperate with Judge Barnes and the other Parties to create a reasonable procedural schedule for this matter.

### **XIII. Settlement**

. I am willing to participate in settlement discussions that may arise during the pendency of this matter.

Respectfully Submitted,

Melissa DiBernardino

February 8, 2019