

February 12, 2019

Via Electronic Filing

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

Re: Melissa DiBernardino v. Sunoco Pipeline, L.P.
Docket No. C-2018-3005025

Dear Secretary Chiavetta:

Enclosed for electronic filing with the Commission please find a Letter to Judge Barnes regarding Sunoco Pipeline LP's Opposition to the Intervention of Thomas Casey, in the above-captioned proceeding. Please direct all responses and any documents via electronic format to tcaseylegal@gmail.com.

If your office has any questions, please do not hesitate to contact me.

Respectfully,

A handwritten signature in black ink, appearing to read 'Thomas Casey', written over a light blue circular stamp.

Thomas Casey, *pro se*
1113 Windsor Drive
West Chester, PA 19380
tcaseylegal@gmail.com

cc: Hon. Elizabeth H. Barnes
Melissa DiBernardino
Virginia Marcille-Kerslake
Thomas J. Sniscak, Esq.
Robert D. Fox, Esq.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Melissa DeBernardino	:	
	:	Docket No. C-2018-3005025
Complainant,	:	
v.	:	
	:	
Sunoco Pipeline, L.P.,	:	
Respondent.	:	

**RESPONSE TO SUNOCO PIPELINE, L.P.’S DENIAL TO INTERVENE
FOR THOMAS CASEY, AS FILED IN THEIR PREHEARING CONFERENCE
MEMORANDUM (Feb. 8, 2019)**

Pursuant to 52 Pa. Code §§ 5.72-5.75 Thomas Casey (“INTERVENER”) hereby files this DENIAL to the Response to Sunoco Pipeline, L.P.’s (“SPLP”) Denial to Intervene for Thomas Casey in the above captioned proceeding. In support thereof, INTERVENER states as follows:

1. INTERVENER will only speak to the portion of SPLP’s document that pertains to SPLP’s attempted denial of his Intervention.
2. **DENIED** – Regarding SPLP’s section **J. Petitions to Intervene**. Pursuant to 52 Pa. Code §5.66¹ Answers to petitions to intervene, SPLP had 20 days from the filing date of December 19, 2018 to respond with a Denial for Intervention. SPLP did not file in a timely manner, nor a reasonably timely manner, to deny intervention in this matter like they did with the referenced Formal Complaint at Docket No. C-2018-3006534.

SPLP’s alleged providing of “necessary information to landowners” is problematic for their position due to the many other filings and complaints before the commission and letters from

¹ § 5.66. Answers to petitions to intervene.

(a) A party may file an answer to a petition to intervene within 20 days of service, and in default thereof, may be deemed to have waived objection to the granting of the petition. Answers shall be served upon all other parties.

Chester County officials that specifically claim a “lack” of transparency and information being provided to the public.

3. Complainant has not filed a request to deny Intervention for Intervener.

THEREFORE, INTERVENER respectfully requests that the Honorable Judge Barnes *deny* SPLP’s request to deny intervention and authorize his intervention and participation in the proceedings as a full and active *pro se* party.

Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas Casey', written in a cursive style.

Thomas Casey, *pro se*

Dated: February 12, 2019

VERIFICATION

I, Thomas Casey, hereby verify that the facts contained in the foregoing pleading are true and accurate to the best of my knowledge and understanding. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas Casey', written in a cursive style.

Thomas Casey, *pro se*

Dated: February 12, 2019

CERTIFICATE OF SERVICE

I hereby certify that this day I have served a copy of Thomas Casey's Response to SPLP's Denial for Intervention upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a party).

VIA ELECTRONIC SERVICE

Melissa DeBernardino
1602 Old Orchard Lane, West Chester, PA 19380
lissdibernardino@gmail.com

Elizabeth Barnes, Administrative Law Judge
PA Public Utility Commission
ebarnes@pa.gov

Virginia Marcille-Kerslake
103 Shoen Road, Exton PA 19341
vkerslake@gmail.com

Thomas J. Sniscak
PA ID. # 33891
tjsnjscak@hmslegal.com

Kevin J. McKeon
PA ID. # 30428
kjmckeon@hmslegal.com

Whitney E. Snyder
PA ID. #316625
wesnyder@hmslegal.com

Hawke McKeon & Sniscak,LLP
100 North Tenth Street
Harrisburg, PA 17101

Robert D. Fox
PA ID No. 44322
rfox@mankogold.com

Neil S. Witkes
PA ID No. 37653
nwitkes@mankogold.com

Diana A. Silva
PA ID No. 311083
dsilva@mankogold.com

Manko, Gold, Katcher & Fox, LLP
401 City Avenue, Suite 901
Bala Cynwyd, PA 19004

Sincerely,



Thomas Casey, *pro se*

Dated: February 12, 2019