



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
COMMONWEALTH KEYSTONE BUILDING  
400 NORTH STREET, HARRISBURG, PA 17120

IN REPLY PLEASE  
REFER TO OUR FILE

March 14, 2019

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

Re: Meghan Flynn, *et al.* v. Sunoco Pipeline, L.P.  
Docket Nos. C-2018-3006116 and P-2018-3006117  
**I&E Revised Affidavit**

Dear Secretary Chiavetta:

Enclosed for paper filing is an executed and notarized affidavit from Sunil R. Patel, Fixed Utility Valuation Engineer ("FUVE") III of the Bureau of Investigation and Enforcement's ("I&E") Safety Division that contains a correction to the docket numbers listed in the caption. This affidavit supplements the Objection to Complainants' Application for Issuance of Subpoena filed by I&E on March 11, 2019 in the above-referenced matter. Complainants' Application for Issuance of a Subpoena has since been denied by the Second Interim Order of Presiding Administrative Law Judge Elizabeth H. Barnes dated March 12, 2019.

Copies are being served on the parties of record in accordance with the attached Certificate of Service.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

Stephanie M. Wimer  
Senior Prosecutor  
Attorney ID No. 207522

Enclosure

cc: Honorable Elizabeth H. Barnes  
Michael L. Swindler, Deputy Chief Prosecutor, I&E  
As per Certificate of Service  
Margaret A. Morris ([mmorris@regerlaw.com](mailto:mmorris@regerlaw.com))  
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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MEGHAN FLYNN, *et al.*,  
Complainants

v.

SUNOCO PIPELINE, L.P.,  
Respondent

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Docket Nos. C-2018-3006116 &  
P-2018-3006117

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MAR 14 2019


**AFFIDAVIT OF SUNIL R. PATEL**

Sunil R. Patel, Affiant, hereby states as follows:

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

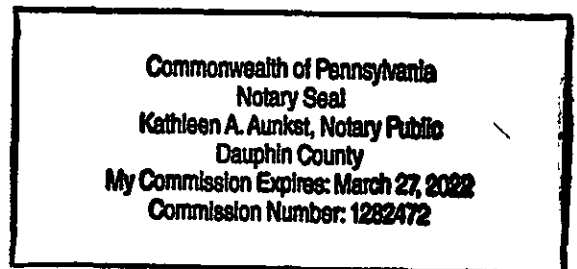
1. My name is Sunil R. Patel and I am a Fixed Utility Valuation Engineer ("FUVE") III in the Safety Division of the Pennsylvania Public Utility Commission's Bureau of Investigation and Enforcement.
2. I investigated the Morgantown Leak incident and assisted, and continue to assist, I&E prosecutors regarding the I&E Complaint proceeding concerning the Morgantown Incident, which is docketed at C-2018-3006534.
3. All of the technical records provided to me by Sunoco Pipeline, L.P. ("Sunoco") during the course of I&E's investigation of the Morgantown Incident and since the conclusion of the same investigation were marked by Sunoco as being proprietary and confidential information as well as confidential security information.
4. I created documents containing notes and analyses of my opinions and conclusions of the investigation of the Morgantown Incident that were furnished to I&E prosecutors and were used to initiate I&E's formal enforcement proceeding against Sunoco at Docket No. C-2018-3006534.
5. I reviewed and edited documents containing settlement offers and settlement counter-offers regarding I&E's Complaint proceeding against Sunoco concerning the Morgantown Incident, which is docketed at C-2018-3006534.

Dated: 3/14/2019

  
\_\_\_\_\_  
Sunil R. Patel

SWORN TO and SUBSCRIBED BEFORE  
ME THIS 14<sup>th</sup> DAY OF March, 2019

  
\_\_\_\_\_  
NOTARY PUBLIC



**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MEGHAN FLYNN, *et al.*,  
Complainants

v.

SUNOCO PIPELINE, L.P.,  
Respondent

Docket Nos. C-2018-3006116 &  
P-2018-3006117

**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 52 Pa. Code § 1.54 (relating to service by a party).

Service as indicated below:

**Via First Class Mail and Electronic Mail:**

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*Counsel for Complainants*

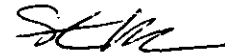
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*Counsel for Sunoco Pipeline, L.P.*



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Stephanie M. Wimer  
Senior Prosecutor  
PA Attorney ID No. 207522

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Dated: March 14, 2019