

Laura Obenski  
14 S Village Avenue  
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Rosemary Chiavetta  
Pennsylvania Public Utility Commission  
P.O. Box 265  
Harrisburg, PA 17105-3265

April 7, 2019

Re: Laura Obenski v. Sunoco Pipeline L.P., #C-2019-3006905  
ANSWER TO SUNOCO'S MOTION TO CONSOLIDATE

Dear Secretary Chiavetta,

Enclosed for filing with the Pennsylvania Public Utility Commission, please find the Answer to Sunoco's Motion to Consolidate my complaint at Docket #C-2019-3006905 with the Flynn et al complaint at Docket # C-2018-300616, the Rebecca Britton complaint at Docket #C-2019-3006898 and the Melissa DiBernardino complaint at Docket #C-2018-3005025.

Regards,

  
Laura Obenski, *pro se*

Attachment  
cc: Certificate of Service

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

LAURA OBENSKI  
*Complainant*

v.

SUNOCO PIPELINE L.P.  
*Respondent*

DOCKET #C-2019-3006905

MEGHAN FLYNN ET AL.  
*Complainants*

v.

SUNOCO PIPELINE L.P.  
*Respondent*

DOCKET #C-2018-300616

REBECCA BRITTON  
*Complainant*

v.

SUNOCO PIPELINE L.P.  
*Respondent*

DOCKET #C-2019-3006898

MELISSA DIBERNARDINO  
*Complainant*

v.

SUNOCO PIPELINE L.P.  
*Respondent*

DOCKET #C-2018-3005025

**OBENSKI ANSWER TO SUNOCO’S MOTION TO CONSOLIDATE**

On March 19, 2019, Sunoco motioned for the consolidation of the above referenced complaints. Previously, on February 26<sup>th</sup> 2019, I motioned for the consolidation of my complaint with the Meghan Flynn et al. complaint (see Exhibit A). Seeing as though I have already requested to consolidate in the interest of judicial economy, the time and cost of litigation for all parties and the Commission, and the interrelated issues in both proceedings, I am not opposed to this motion to the extent that it impacts the argument and relief requested of my own complaint.

Should a ruling be issued ordering the consolidation of the above referenced complaints, I do request to retain full party status in the proceedings. I reserve the right to prosecute my own argument and do not forfeit any rights or requested relief in the process of consolidation. I believe this to be a reasonable request, given the limited nature of my complaint and requested relief.

Additionally, in the event of consolidation, I request that Your Honor considers the impact of the hearing length and schedule upon the pro se complainants, including the financial burden of travel, missed time from work, and accommodations needed for childcare as ALL of the pro se complainants are the primary caregivers of their young families.

Respectfully,



Laura Obenski, pro se  
April 7, 2019

# **EXHIBIT A**

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

LAURA OBENSKI

*Complainant*

v.

SUNOCO PIPELINE L.P.

*Respondent*

DOCKET #C-2019-3006905

Meghan Flynn et al.

*Complainants*

v.

SUNOCO PIPELINE L.P.

*Respondent*

DOCKET #C-2018-300616

**OBENSKI MOTION TO CONSOLIDATE**

**To the Honorable Administrative Law Judge Elizabeth Barnes:**

I hereby request, pursuant to 52 Pa Code § 5.81, for the consolidation of my complaint at Docket #C-2019-3006905 with the Flynn et al. complaint at Docket #C-2018-300616.

The authority to consolidate proceedings that involve a common finding of law or fact is given to the Commission under 52 Pa. Code § 5.81, which states in relevant part:

**§ 5.81. Consolidation**


(a) The Commission or presiding officer, with or without motion, may order proceedings involving a common question of law or fact to be consolidated. The Commission or presiding officer may make orders concerning the conduct of the proceeding as may avoid unnecessary costs or delay.

52 Pa. Code § 5.81

In the interest of judicial economy, the time and cost of litigation for all parties and the Commission, and the interrelated issues in both proceedings, I believe consolidation to be in the best interest of all.

WHEREFORE, I respectfully request that the Honorable Judge Elizabeth Barnes enter an order consolidating my complaint at Docket #C-2019-3006905 with the Flynn et al complaint at Docket #C-2018-300616.


Respectfully Submitted,

  
Laura Obenski, *pro se*

Dated: February 26, 2019

## CERTIFICATE OF SERVICE

I hereby certify that on this day, April 7, 2019, I have served a true copy via electronic mail of the forgoing document upon the parties, listed below, in accordance with the requirements of 52 PA Code § 1.54 (relating to service by a party).

  
Laura Obenski, *pro se*  
April 7, 2019

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