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August 19, 2019

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

Re: In Re: Meghan Flynn, et al. v. Sunoco Pipeline, L.P.
Docket Numbers: C-2018-3006116; P-2018-3006117

Dear Secretary Chiavetta:

Enclosed for electronic filing with the Commission please find the List of Lay Witnesses of the Rose Tree Media School District, Delaware County, Pennsylvania with regard to the above-captioned proceeding.

All parties of record have been served pursuant the attached Certificate of Service. If you have any questions or concerns, please do not hesitate to contact this office.

Thank you very much for your cooperation and assistance.

Very Truly Yours,

Lamb McErlane, PC

By: /s/ Guy A. Donatelli
Guy A. Donatelli
Counsel for Rose Tree Media School

District
GAD/ajb
Enclosures
cc: Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

| | | |
|--------------------------------------|---|---------------------------|
| In Re: Meghan Flynn, Rosemary Fuller | : | |
| Michael Walsh, Nancy Harkins, Gerald | : | Docket No. C-2018-3006116 |
| McMullen, Caroline Hughes and | : | |
| Melissa Haines | : | Docket No. P-2018-3006117 |
| Petitioner, | : | |
| | : | |
| v. | : | |
| | : | |
| Sunoco Pipeline, L.P., | : | |
| | : | |
| Respondent. | : | |

**LAY WITNESSES OF INTERVENOR THE ROSE TREE MEDIA SCHOOL DISTRICT,
DELAWARE COUNTY, PENNSYLVANIA**

Pursuant to the Prehearing Order dated August 2, 2019, Intervenor the Rose Tree Media School District, Delaware County, Pennsylvania (“the School District”) provides this list of lay witness, names, addresses and brief summaries of the subject matter to which they are expected to testify at the hearing scheduled for October 23 and October 24, 2019, and respectfully submits as follows:

A. Eleanor DiMarino-Linnen, Ph.D., Superintendent of Schools for the Rose Tree School District, 308 North Olive Street, Media, PA 19063 - (610)-267-6000.

Dr. DiMarino-Linnen is expected to testify about the composition of the School District, its mission, its schools, the schools’ physical layout and the communities they serve. Dr. DiMarino-Linnen will discuss the proximity of the Glenwood Elementary School, Middletown Township, Delaware County, Pennsylvania, which is located in close proximity to the Mariner East 2 (“ME2”) pipeline and within the “blast zone.” Dr. DiMarino-Linnen is also expected to testify the additional risk to the Glenwood Elementary School, namely a Sunoco valve station located immediately behind Glenwood Elementary School, and which increases the risk of harm to the students, staff and visitors resulting from leak, mechanical failure, purposeful damage or other

failure of the valve station.

Dr. DiMarino-Linnen is also expected to testify to the School District's desire for line inspection and geophysical testing, disclosure of those inspection and testing results, cessation of pipeline operations if testing demonstrates that corrective actions are necessary; mass early warning notification system at all potentially affected School District Schools which would provide immediately notice of a leak, potential explosion or other failure in the pipeline system; the benefits of School District-specific public education or awareness plan designed to inform and educate the students, families and School District Staff on proper and effective disaster prevention and response, and the relocation of the valve station currently adjacent to Glenwood Elementary School.

B. Mr. Eric Bucci, Principal, Glenwood Elementary School, 122 South Pennell Road, Media, PA 19063 - (610)-267-6000.

Mr. Bucci is expected to testify, without repetition to the testimony of Dr. DiMarino-Linnen, the concerns surrounding the risks to the Glenwood Elementary School, its students and staff and the risk posed by the valve station immediately adjacent thereto.

C. General proofs.

The School District anticipates presenting illustrative or demonstrative exhibits to assist the witnesses identified above, and anticipates testimony consistent with its Petition to Intervene.

Respectfully submitted,

LAMB MCERLANE PC

By: /s/ Guy A. Donatelli

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Dated August 19, 2019

CERTIFICATE OF SERVICE

I hereby certify that this day I have served a copy of the foregoing 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 Mail Service

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August 19, 2019

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