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August 20, 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 Downingtown Area School District, Chester 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
Solicitor for Downingtown Area School
District

GAD/ajb
Enclosures
cc: Per Certificate of Service

Grade Center, and risks of harm resulting from an automobile collision, leak or other failure of the valve station. Dr. Lonardi is 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 demonstrate 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 education the students, families and School District Staff on proper and effective disaster prevention and response, and the relocation of the valve station currently on Dorlan Mill Road.

B. Mr. Thomas Mulvey, Principal, Marsh Creek Sixth Grade Center, 489 Dorlan Mill Road, Downingtown, PA 19335 - (610)-646-0081.

Mr. Mulvey is expected to testify, without repetition to the testimony of Dr. Lonardi, the concerns surrounding the valve station along Dorlan Mill Road, in Upper Uwchlan Township, which is directly across the street from the Shamona Creek Elementary School and the Marsh Creek Sixth Grade Center.

C. Tim Hubbard, Chief Security Officer, reporting to Office of the Superintendent, Downingtown Area School District, 540 Trestle Place, Downingtown, PA 19335 - (610)-269-8460.

Mr. Hubbard is expected to testify to emergency management considerations particular to events affecting elementary and secondary schools and in support of the concerns identified by Dr. Lonardi and Mr. Mulvey. Mr. Hubbard will discuss response protocols, how they affect the surrounding communities, the advantages for early detection, notification, coordination, responses for special needs populations (such as schools) and education specific to events unique to the risks posed by the Sunoco Pipelines.

D. General proofs.

The District anticipates presenting illustrative or demonstrative exhibits to assist all 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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Downingtown Area School District

Dated August 20, 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 20, 2019

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