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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 West Whiteland Township, Chester County, Pennsylvania with regard to the above-referenced 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/ Vincent M. Pompo
Vincent M. Pompo
Solicitor for West Whiteland Township

VMP/ajb
Enclosures
cc: Per Certificate of Service

and constitutionally imposed duties to protect the health, safety and welfare of all who reside and traverse through its boundaries, including practical concerns relating to the Township being within the “blast zone”, its past communications and present concerns with Sunoco’s production of information and its effect on the Township’s ability to engage in effective pre and post-disaster emergency planning.

The selected Supervisor is also expected to testify to the Township’s need and desire for an improved system to keep the Supervisors, the Township’s Staff and Emergency Planners informed on proper and effective disaster prevention and response and a public education or awareness plan designed to better inform those who live and work near pipelines about what to expect and how to respond in the event of a pipeline emergency. This testimony will include discussion as to 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 the unique risks posed by the Sunoco Pipelines.

Lastly, the selected Supervisor is expected to testify as to the need and desire for a Remaining Life Study of the ME1 pipeline and why a specific section within the report, to be updated an annual basis so long as the ME1 pipeline remains in Highly Volatile Liquid Service, which addresses the remaining life of the segments of ME1 located within the Township is necessary.

D. General proofs.

The Township anticipates presenting illustrative or demonstrative exhibits to assist its witness identified above.

Respectfully submitted,

LAMB MCERLANE PC

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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

The Honorable Elizabeth Barnes
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