

BEFORE THE
PUBLIC UTILITY COMMISSION

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

PROPOSED LAY WITNESSES OF INTERVENOR
TWIN VALLEY SCHOOL DISTRICT

Pursuant to the Prehearing Order of August 2, 2019, the Twin Valley School District has identified the following individuals as potential lay witnesses who may testify at Public Utility Commission hearings in the above-captioned matter on October 23 and 24, 2019. The District will amend the list as necessary if new subject areas for testimony arise.

Both witnesses may be contacted at the Twin Valley School District, 4851 N. Twin Valley Road, Elverson, Pennsylvania, 19520. They may be reached by phone at 610.286.8600.

A. William Clements, Principal, Twin Valley High School

Christopher Watson, Director of Pupil Services

Mr. Clements and Mr. Watson are both members of the Twin Valley School District Safety Committee, which conducts ongoing assessments of the District's ability to respond to man-made and natural disasters. One or both of them will be available to testify about the development of the District's All-Hazards plan, ongoing consultation with emergency management officials in the District's community regarding the pipeline, and current protocols

for evacuation in case of an adverse event. They will be available to testify about the specific challenges of evacuating students in a rural area with limited infrastructure.

In addition, they may testify about the composition of the School District; the geographic distribution of schools and school facilities, particularly the location of multiple District schools within the “blast zone” of the pipeline; and community concerns about the potential for adverse events related to the pipeline. Finally, they may testify about current efforts to gather and disseminate information to School District constituencies, and the District’s past experience in receiving notifications or warnings regarding pipeline events or errors within the District boundaries.

Respectfully submitted,

MAYS, CONNARD & ROTENBERG LLP



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