



September 12, 2019

Rosemary Chiavetta, Esq.  
Secretary  
Pennsylvania Public Utility Commission  
PO Box 3265  
Harrisburg, PA 17105-3265

**Via Electronic Filing**

*RE: Flynn et. al. v. Sunoco Pipeline L.P., Dockets P-2018-3006117 and C-2018-3006116  
Witness List of Andover Homeowners' Association, Inc.*

Dear Secretary Chiavetta,

As directed in the Second Prehearing Order in the above-referenced matter issued September 5, 2019, Andover Homeowners' Association, Inc. hereby submits its witness list for the upcoming October 23 and 24, 2019 Public Hearings in West Chester.

We have served a copy of the Witness List upon the parties pursuant to the attached Certificate of Service.

Please contact me with any questions.

Sincerely,

/s/ Rich Raiders

Rich Raiders, Esq.

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Meghan Flynn, Rosemary Fuller, Michael Walsh, Nancy Harkins, :  
Gerald McMulle, Caroline Hughes and Melissa Haines : C-2018-3006116  
 : P-2018-3006117  
v. :  
 :  
Sunoco Pipeline, L.P. :

**PROPOSED LAY WITNESS LIST OF ANDOVER HOMEOWNERS’ ASSOCIATION, INC.**

Pursuant to the Second Prehearing Order of September 5, 2019, Intervenor, Andover Homeowners’ Association, Inc. (“Association”), has identified the following individual as a potential lay witness who may testify at the Public Utility Commission (“Commission”) hearings scheduled for October 23 and 24, 2019 in this matter. The Association may amend this list as necessary if new subject areas for testimony arise.

Eric Friedman, 2 Fallbrook Lane, Glen Mills, PA 19342 is the President of the Association. As the President, he is responsible for the oversight of the Association’s property, which includes several acres of open space conveyed for the enjoyment of the Association’s Members. Approximately three (3) of these acres are encumbered by Sunoco Pipeline L.P. (“Sunoco”), respondent here, for operation of four (4) hazardous liquids pipelines. Sunoco is constructing additional valve sites on Association property for the Mariner East 2/2X project, co-located adjacent to the existing Mariner East 1 valve site on Association property.

Denise McCarthy, 17 Hadley Lane, Glen Mills, PA 19342 is a homeowner in the Association. Ms. McCarthy will testify to the impacts of the pipeline. Ms. McCarthy will also testify to her knowledge of what to do if an emergency situation would occur because of the pipeline.

Mr. Friedman is also identified as a lay witness for the complainants in this matter, and will testify on behalf of Flynn et.al. on matters identified in complainants' filing. For the Association, Mr. Friedman will testify to the impacts of highly volatile liquid transportation, including pipeline and valve site issues, within the context of the Association, its Members, its neighbors and other stakeholders in the immediate vicinity of Association property and within the potential "blast zone" of any such incident. Mr. Friedman will also testify about the local land use, the Association's, its Members', and his understanding of the current Public Awareness Program for the pipelines crossing Association property, and his understanding of potential impacts to Association Members in the event of a pipeline incident. Mr. Friedman will also testify about the work done to date by the Association on a public notification system. Mr. Friedman will also testify about Andover home sales before and after Sunoco.

Association and complainant counsel are coordinating Mr. Friedman's testimony to avoid cumulative testimony.

Respectfully Submitted,

Date: September 12, 2019

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**C-2018-3006116 et. al.- MEGHAN FLYNN et. al. v. SUNOCO PIPELINE LP**

*(Revised 9/3/19)*

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