

Rebecca Britton
211 Andover Dr.
Exton PA 19341

October 14, 2019

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Filing Room
Harrisburg, PA 17120

Re: Rebecca Britton v. Sunoco Pipeline L.P.; Docket No. C-2019-3006898

Meghan Flynn. et al. v. Sunoco Pipeline L.P.; Docket Nos. C-2018-3006116 and
P-2018-3006117;

**Rebecca Britton Letter in Response to SPLP's Answer to Motion to
Sanctions**

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission is Rebecca Britton's letter in response to SPLP's Answer to Motion for Sanctions. I felt it necessary to write the letter to clear my good name. While I am not certain if it will be allowed I am attaching hereto with the hopes it can be considered.

If you have any questions regarding these filings please do not hesitate to contact me.

Very Truly Yours,



Rebecca Britton
Pro se
October 14, 2019

October 14, 2019

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Filing Room
Harrisburg, PA 17120

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Rebecca Britton :
211 Andover Dr. :
Exton, PA 19341 : Docket No. C-2019-3006898
Complainant :

Consolidated :
MEGAN FLYNN *et al* : **Docket Nos.C-2018-3006116**

v. :

SUNOCO PIPELINE L.P., :
Respondent. :

:

Letter to Judge Barnes

Dear Judge Barnes,

I respectfully write to you today because after reading SPLP's Response to Sanctions I feel as though my character has been harmed and I would like the opportunity to clear my good name on the record. Your Honor, I can only describe what is set forth in that document as scurrilous accusations that slander me. The entire argument is thinly veiled as "protecting national security" from "Saudi oil attacks", when indeed the only protection counsel is seeking is keeping me out of the courtroom.

1. I call myself a "safety advocate" and have immersed myself in the study of pipelines, NGL's and hazard preparedness, preparation and mitigation for many years. I have done

this without pay, or any self serving principal other than protecting my biggest financial and personal assets, my home and my family.

2. My fear is set ablaze by the suggestion of a “Saudi Oil Attack” here in Chester County. Foreign or domestic terrorism is one of the reasons I set forth my complaint. Who wants to live or send their children to school next to a national security risk?
3. If I am barred from being able to view these documents then I will be barred from the courtroom as the case moves forward. When sensitive information is discussed I will be asked to leave. This is no way to act as my own lawyer as is required of me while filing pro se. Counsel continually “lobs” this idea around that, “I took on this case knowing I had to comply with commission regulations and courtroom proceedings” like a bag of cement. In signing these documents I am acting as my own counsel. The pro se process should no longer be allowed to continue if I am barred from being in the courtroom through the entire hearing. That would cause me an extreme bias.
4. I do NOT wish or plan to “opine” as a witness on the documents.
5. Respondent is a “well oiled”, pun intended, politically connected multi billion dollar organization. Who currently generates \$6 billion in discretionary cash after all maintenance capital expenditures per a recent investment blogger Seeking Alpha(<https://www.google.com/amp/s/seekingalpha.com/amp/article/4295881-energy-transfer-power-buybacks-debt-reduction>) . To put it bluntly, I am sure, if I do not conform with the agreement they can and will try to ruin me.
6. Counsel needs to remember that just like I am a pro se Complainant, it is the policy of the Pennsylvania Utility Commission, to allow pro se filings. Alternatively, counsel must submit to having to “deal” with pro se Complainants. It is just part of having a Certificate of Public Convenience.
7. Counsel accuses me of “seeking legal advice”. I wouldn’t seek legal advice from opposing counsels lawyers if they were the last lawyers on earth. This accusation amounts to an absurd accounting of facts being that it is an incontrovertible truth that they are “opposing” counsel.
8. Upon my initial signing and sharing of the document my expectation was that if there was a disagreement that Respondent would file for a motion to suppress or other motion on the record requesting pro se filers to not have access. If he did this I would be barred from filing for sanctions as indicated in code 52.
9. Furthermore, emailing the signed non disclosure was the only communication of the signed document I was privy to in the proceedings. No other “lawyers” filed the non disclosure in the filing system to my knowledge. Therefore I did the same, signed and sent to the email communication list.
10. I also had the expectation that Respondent was going to follow Judge’s orders. Her Honor stated that she encouraged Sunoco and opposing aligned parties to talk and work things out for ourselves. At anytime over multiple emails Respondent could have communicated to me that they are denying my request.
11. When I finally cc’d Judge Barnes and other counsel’s on my email communications, suddenly, a response appeared miraculously.

12. This miraculous email did not give “legal advice” instead it was improper motions that favored opposing counsel. Again, begging the question why not have communicated their intentions earlier?

If her Honor has read the letter, I am truly grateful for allowing me to restate my intentions and clear my good name, and pray the court comes to a finding in my favor on the matter.

Respectfully Submitted,



CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 1.54 (relating to service by a party).

This document has been filed via electronic filing:

VIA ELECTRONIC FILING

Pennsylvania Public Utility Commission
efiling system

Thomas J. Sniscak, Esq
tjsniscak@hmslegal.com

Kevin J. McKeon
kjmckeon@hmslegal.com

Whitney E. Snyder
[@hmslegal.com](mailto:whitney@hmslegal.com)

Robert D. Fox, Esq.
Neil S. Witkes, Esp.
Diana A. Silva, Esq.
rfox@mankogold.com
nwitkes@mankogold.com
dsilva@mankogold.com

Michael Bomstein
mbomstein@gmail.com

Anthony D. Kanagy, Esquire
Garrett P. Lent, Esquire
akanazy@postschell.com
glent@postschell.com

Rich Raiders, Esq.
rich@raiderslaw.com

Vince M. Pompo, Esq.
Guy. A. Donatelli, Esq
Alex J. Baumler, Esq.
vpompo@lambmcerlane.com
Gdonatelli@lambmcerlane.com
abaumler@lambmcerlane.com

Margaret A. Morris, Esq.
mmorris@regerlaw.com

Leah Rotenberg, Esq.
rotenberg@mcr-attorneys.com

Mark L. Freed
mlf@curtinheefner.com

James R. Flandreau
jflandreau@pfbllaw.com

David J. Brooman
Richard Sokorai
Mark R. Fischer
dbrooman@highswartz.com
rsokorai@highswartz.com
mfischer@highswartz.com

Thomas Casey
tcaseylegal@gmail.com

Josh Maxwell
jmaxwell@downingtow.org

Laura Obenski
ljobenski@gmail.com

Stephanie M. Wimer
stwimer@pa.gov

Michael Maddren, Esq.
Patricia Sons Biswanger, Esq.
maddrenM@co.delaware.pa.us
patbiswanger@gmail.com

James C. Dalton, Esq.
jdalton@utbf.com

Melissa DiBernardino
lissdibernardino@gmail.com

Virginia Marcille-Kerslake
vkerslake@gmail.com

James J. Byrne, Esq.

Kelly S. Sullivan, Esq.
jjbyrne@mbmlawoffice.com
ksullivan@mbmlawoffice.com

Honorable Elizabeth Barnes
ebarnes@pa.gov



Rebecca Britton
Pro se
October 14, 2019

VERIFICATION

I, Rebecca Britton, hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).



Rebecca Britton
Pro se
October 14, 2019

