

Rebecca Britton
211 Andover Dr.
Exton PA 19341

February 10, 2020

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

Melissa DiBernardino v. Sunoco Pipeline L.P.; Docket No. C-2018-3005025;

Laura Obenski v. Sunoco Pipeline L.P.; Docket No. C-2019-3006905

REBECCA BRITTON'S RESPONSE TO SUNOCO'S OMNIBUS MOTION

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission is Rebecca Britton's response to Sunoco Pipeline L.P.'s omnibus motion.

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

Very Truly Yours,



Rebecca Britton
Pro se
February 10, 2020

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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	:	
 	:	
v.	:	
 	:	
SUNOCO PIPELINE L.P. ,	:	
Respondent.	:	
 	:	
MEGAN FLYNN <i>et al</i>	:	Docket Nos.C-2018-3006116
v.	:	P-2018-3006117
SUNOCO PIPELINE L.P.>,	:	
 	:	
MELISSA DIBERNARDINO,	:	
v.	:	Docket No. C-2018-3005025
SUNOCO PIPELINE L.P.>,	:	
 	:	
LAURA OBENSKI	:	
v.	:	Docket No. C-2019-3006905
SUNOCO PIPELINE L.P.>,	:	

REBECCA BRITTON TO SPLP's OMNIBUS MOTION

On January 2020 Counsel for Flynn sent an email correspondence to all parties of record. At that time I was grateful for the correspondence; I thought the letter was timely given my personal concerns and questions regarding procedures going forward.

I am personally unaware of any orders from Judge Barnes regarding “ongoing discovery”. Respondent claims that Complainants have had abundant time to conduct discovery; however, that is an error in judgement that could result in misuse of taxpayers dollars on the Commissions part. Operations, maintenance and construction of the Mariner East Pipelines is ongoing. To limit discovery now forces new complaints for matters that are relevant, direct, immediate and substantial. Having to file new complaints for matters that are already before the Commission is not good use of the Commission’s time, does not benefit judicial economy and is not in the interest of SPLP’s financial bottom line.

For the reason stated above I am requesting Your Honor deny Sunoco’s motion and instead order an amended procedural order.

1. Denied. The pretrial order is not a motion to “lay on the table” everything that was not discussed explicitly for the benefit of SPLP. One pretrial conference call that significantly would affect the balance of this case should not dictate all matters where issues arise from disagreement between the parties.

2. Admitted.

3. Denied. Given SPLP’s propensity to overuse Confidential Security to date I still have not seen any discovery items, nor was I able to acquire an expert to testify in the next round, as it

was futile to have an expert testify to things I already testified to or documents that speak for themselves.

4. Denied. Sunoco has no authority to support their position.

5. Denied as stated. If discussion did not occur during our pre conference hearing it did not mean I was agreeing to “lay my rights on the table”.

6. Denied. I would like to reserve continued discovery for ongoing materials matters of the case that would result in judicial economy.

7. Affirmed.

8. Denied. Thankful that the motion was given until Feb 10. When decisions of this magnitude are being asked of the court it seems just and correct.

No's (9-32) ALL Denied. Denied for judicial economy of time because I have sufficiently answered my response in the first 8.

Respectfully Submitted,

A handwritten signature in black ink that reads "Rebecca Britton". The signature is written in a cursive, flowing style.

Rebecca Britton

February 10, 2020

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

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Rebecca Britton
Pro se

February 10, 2020

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).

A handwritten signature in black ink that reads "Rebecca Britton". The signature is written in a cursive style with a large initial 'R'.

Rebecca Britton
Pro se
February 10, 2020