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September 2, 2014

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street- 2nd Floor
Harrisburg, PA 17120

In Re: Lower Chichester Township v. PECO Energy Company
PUC Docket No.: C-2014-2433515

Dear Ms. Chiavetta:

Enclosed for filing with the Commission with regard to the above-matter are:

- (1) Lower Chichester Township's Reply to New Matter of PECO Energy Company; and,
- (2) Verification of Francis T. Sbandi, Solicitor for Lower Chichester Township to Complaint letter dated July 9, 2014.

I have enclosed Certificate of Services indicating that a copy of each of the above documents have been served on interested parties.

Thank you for your time and consideration in this matter.

Very truly yours,



FRANCIS T. SBANDI
SOLICITOR
LOWER CHICHESTER TOWNSHIP

FTS
Encls.
C: Ward L. Smith, Counsel for PECO Energy Company
Township Commissioners

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ATTORNEY FOR COMPLAINANT

PENNSYLVANIA PUBLIC UTILITY COMMISSION

LOWER CHICHESTER TOWNSHIP	:	DOCKET NO. C-2014-2433513
Complainant	:	
vs.	:	
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

**LOWER CHICHESTER TOWNSHIP'S REPLY TO NEW MATTER
OF PECO ENERGY COMPANY**

Lower Chichester Township (hereinafter Township) responds to New Matter of PECO Energy Company (hereinafter PECO):

1. Denied. The Township after reasonable investigation is without knowledge or information sufficient to form a belief as to the truth of the said averment. For further answer, whatever consideration PECO gave to this project was not made known to the Township. For further answer PECO measures 1.0 miles via Hewes Avenue and .9 miles by a Huddle Avenue to Ridge Road; whereas on the contrary, the Township proposal measures .8 miles. The Peco proposal impacts three (3) Townships streets; whereas the Township proposal impacts one (1) Township street. PECO's proposal impacts a significant number of residences, i.e. 184 versus the Township's proposal of 51 residences if PECO uses Baker Street. The PECO proposal also impacts an elementary school, the Lower Chichester Township Volunteer Fire Company , the U.S. Post Office, as well as many more businesses. See Exhibit "A" attached hereto.

2. Admitted in part, denied in part. It is admitted that PECO presented some information regarding the route and other project information to the Township and the public. It is denied that

presentations were extensive. For further Answer, a Petition signed by 99 residents of Lower Chichester Township in opposition to the PECO route and project is attached hereto as Exhibit "B".

3. Denied. The Township after reasonable investigation is without knowledge or information sufficient to form a belief as to the truth of the said averment. For further answer, notwithstanding any requirement to build this project pursuant to PJM's Regional Transmission Expansion Plan, PECO is not permitted or authorized to select a route in Lower Chichester Township which is injurious to the health, safety and welfare of the community in general and the residents in particular.

4. Admitted in part and denied in part. It is admitted that PECO has performed public outreach phases of this project. It is denied that PECO has listened to or taken the advice presented to it from the local government officials and residents of the Township. See objections of residents in Exhibit "B".

5. Admitted in part. It is admitted that PECO does perform public outreach processes; however, PECO despite the outreach processes did not accept the preferences outlined by residents and local government officials with respect to the impact as set forth in Paragraph 1 above, nor of the alternate route proposed by the Township.

6. Denied. It is denied that PECO has evaluated the comments that is has received from the public and the Township. On the contrary, PECO did not accept comments from the public nor the Township concerning the alternate route proposed by the Township, which route would have a much lesser impact and would not be as injurious as the PECO route. PECO's position is unjust, unreasonable, and not in accordance with law.

7. Denied. The Township after reasonable investigation is without knowledge or information sufficient to form a belief as to the truth of the said averment; for further answer, it is believed that PECO is not in favor of the alternative route proposed by the Township.

8. The Commission's regulations, 52 Pa. Code Section 3.6, speaks for itself and it is believed that the Township's Complaint did meet that criteria.

9. Denied. It is believed that the Complaint filed dated July 9, 2014 complies with the verified statement of facts.

10. Denied. It is denied that the Complaint does not allege or establish that the Township's right to relief is clear. On the contrary, PECO must use Township owned streets and it is believed and therefore averred that the injurious impact on the environment, on the infrastructure, of the roadways, including but not limited to sewer lines, water lines, lateral hookups, fire safety, trash collection, police protection, increased Township costs, excess dust, noise, disruption of the quality of life to the adjoining residents and businesses along said route establishes the Township's right pursuant to the First Class Township Code to protect the health, safety and welfare of the community.

11. Denied. It is denied that the Complaint does not allege or establish a need for relief being immediate. On the contrary, discussions between PECO and the Township had reached an impasse and therefore PECO was not acknowledging any future discussions or change of plans with the Township.

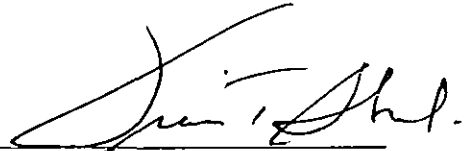
12. Denied. It is denied that the Complaint does not allege or establish that the injury would be irreparable if relief is not granted. On the contrary, PECO would cause immediate damage to Township owned streets, infrastructure, as well as installation of underground conduits on Township owned roads. It is believed that PECO does not have proper easements for the project. Such injury would be detrimental not only to the Township's property but to the residents along the said route, whose lives would be impacted for days and or months.

13. Denied. It is denied that the Complaint does not allege or establish that the relief requested is not injurious to the public interest. On the contrary, PECO did not take into

consideration the impact on the environment, on the infrastructure of the Township roadways, including but not limited to the sewer lines, water lines, lateral hookups, disruption of fire protection, disruption of trash collection, disruption of police protection, excess dust, noise, disruption of the quality of life to the adjoining residents and businesses along the said route.

WHEREFORE, Lower Chichester Township respectfully requests the Honorable Commission not approve the application of PECO Energy Company or authorization to install any transmission lines pursuant to the present PECO Energy Company plan.

Respectfully submitted by:



FRANCIS T. SBANDI, ESQUIRE
Attorney for Lower Chichester Township

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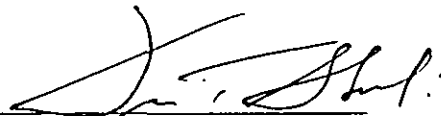
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

PENNSYLVANIA PUBLIC UTILITY COMMISSION

LOWER CHICHESTER TOWNSHIP : DOCKET NO. C-2014-2433513
Complainant :
vs. :
PECO ENERGY COMPANY :
Respondent :

VERIFICATION

FRANCIS T. SBANDI, states he is Solicitor of Lower Chichester Township, Complainant in the above-captioned matter, and is authorized to take this Verification and that the facts set forth in the within Reply to New Matter of PECO Energy Company, are true and correct to the best of his information, knowledge and belief. The undersigned understands that this statement is made subject to the penalties of 18 Pa. C.S.A. 4904 relating to unsworn falsification to authorities.



FRANCIS T. SBANDI
Solicitor
Lower Chichester Township

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Frank,

I measured the Peco route vs the proposed Township Route with corresponding businesses and residences impacted by both routes.

The PECO route measures 1.0 miles via Hewes Ave and .9 miles via Huddell Ave to Ridge Rd

Businesses and residences impacted:

On Laughead Ave (Upper Chichester side)

1 business (open); 1 business (closed), cemetery
27 residences

On Laughead Ave (Lower Chichester side)

1 business (open) 1 business (vacant)
39 residences + 4 unit apartment building

Huddell Ave:

7 businesses; US Post Office; Fire House; Elementary School
83 residences + 17 unit apartment building

Hewes Ave

1 business (open) 1 business (closed); township park, Baptist Church
41 residences + 6 Unit apartment building
4 residences on Jones Dr (exits onto Hewes Ave)
24 apartments on Jones Dr (exits onto Hewes Ave)
1 business on Jones Dr (exits onto Hewes Ave)

The Township Proposed route measures .8 miles

8 businesses, 1 vacant school & church
51 residences

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

WE THE UNDERSIGNED ALL RESIDENTS OF LOWER CHICHESTER TOWNSHIP AND UPPER CHICHESTER TOWNSHIP ARE AGAINST THE PROPOSED ELECTRIC DUCT LINES THAT PECO WANTS TO INSTALL IN OUR TOWNS. THE PROPOSED ROUTE WILL DISRUPT THREE (3) TOWNSHIP OWNED STREETS AND HOME OWNERS WHO RESIDE ON SAME! MOST ARE SENIOR CITIZENS, THE TOWNSHIP COMMISSIONERS HAVE AN ALTERNATE ROUTE THAT WE BELIEVE IS BETTER, SAFER, CHEAPER AND MORE DIRECT FROM SUBSTATION TO SUBSTATION. WE ARE IN FAVOR OF THE COMMISSIONERS PLAN AND WE WILL NOT BE BULLIED BY PECO OR THE PUBLIC UTILITY COMMISSION.

NAME	ADDRESS	SIGNATURE
Barbara Anne Ross	1430 Huddell	[Signature]
Pat Bullock	300 Mellie Ave	[Signature]
Harvey Bullock	307 Mellie Ave	[Signature]
[Signature]	124 Edward St	[Signature]
Philip P. Altman	1548 HUDDALL AVE	[Signature]
Lisa Kearney	1527A HUNTER AVE	[Signature]
Cathy D'Angelo	1619 Hewes Ave. Rear	[Signature]
William F. Marney	1526 O. H. O'NEILL AVE	[Signature]
Mary C. Mauser	1637 Hewes	[Signature]
Richard E. Mauser	1637 Hewes Ave	[Signature]
Jerry A. Manning	5 MAISE DALE	[Signature]
Shirley A. Mavelli	1568 Huddell	[Signature]
Dominick Mavelli	1508 Huddell	[Signature]
Paul Chubb	1619 Ward St	[Signature]
Christina M. M. Mason	1442 Brookside Av	[Signature]
George H. Mason	1545 Hale St Linwood, Pa 19061	[Signature]
Francis R. Fuller, JR	217 WOODROW ST	[Signature]
Bruce Noto	38 W Ridge Rd	[Signature]
Dana D. Gregory	129 W. LAUGHRENE LINWOOD	[Signature]
Dee Ferguson	129 W. LAUGHRENE LINWOOD	[Signature]
Lina Horne	1637 Huddell, Linwood	[Signature]
Chuck Arias	1619 Ward St Linwood	[Signature]
Dominick Arias	1619 Ward St	[Signature]

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NAME	ADDRESS	SIGNATURE
Barbara D. Inman	1449 Bluebell	Barbara Inman
Mina Casell	1450 Tallylyn Ave	Mina Casell
Paul W. Porter Sr.	163 EDWARD ST	Paul W. Porter Sr.
John Wren	1403 Bradley St.	John Wren
Michael Green	1590 Market St	Michael Green
Robert Chandler	1578 Huddell Ave	Robert Chandler
Annmaria Gaspari	1691 Hawes Ave.	Annmaria Gaspari
Joseph Galik	1677 WARD ST	Joseph Galik
James Castagna	111 EDWARD ST	James Castagna
Thom Jones	214 Worri-Low St.	Thom Jones
Robert P. Kirkman	1146 STERLING AVE	Robert P. Kirkman
Frank Tempy	1534 Chichester Ave	Frank Tempy
Michael Blagel	1513 Beaver St.	Michael Blagel
Anthony Schreffler	1649 HUDDALL AVE	Anthony Schreffler
Sharon Schreffler	1649 Huddell Ave	Sharon Schreffler
John Schlachter	1635 CHICHESTER AVE	John Schlachter
Deborah Henderson	1645 Huddell Ave	Deborah Henderson
David Zaluski Sr.	1558 Huddell Ave.	David Zaluski Sr.
Susan A. Lyder	1564 Huddell Ave	Susan A. Lyder
Mina Casell	1450 Tallylyn Ave	Mina Casell

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NAME	ADDRESS	SIGNATURE	
MARK Lamplugh	1555 Beale St Linwood	<i>Mark Lamplugh</i>	F-10
ROBERT W REINE	1546 BEALE ST LINWOOD	<i>Robert W Reine</i>	F-11
Ryan Fuller	100 B Warrillow St	<i>Ryan Fuller</i>	
Brandon Fuller	1119 Ruddell Ave	<i>Brandon Fuller</i>	
MARC Calvechis	100 B Warrillow St	<i>Marc Calvechis</i>	
John Gilchrist	1563 Beale St	<i>John Gilchrist</i>	
Trever Ruzat	3904 Upland Ave	<i>Trever Ruzat</i>	
Tim Francisco	1546 Chichester Ave	<i>Tim Francisco</i>	
Jeff Hill	134C Jones Drive Linwood	<i>Jeff Hill</i>	
John Wolff	110 WARRILLOW ST	<i>John Wolff</i>	
Brian Morley	1546 Huddle St (Linwood)	<i>Brian Morley</i>	
Stephen Castagna	1566 Huddle Ave	<i>Stephen Castagna</i>	
Chris Castagna	1566 Huddle Ave	<i>Chris Castagna</i>	
Cindy Castagna	1566 Huddle Ave	<i>Cindy Castagna</i>	
Melinda Castagna	1666 Ervin Ave	<i>Melinda Castagna</i>	
Michelle Hibbs	1555 Beale Street	<i>Michelle Hibbs</i>	
Nicholas J. Picone	1421 Simpson St	<i>Nicholas J. Picone</i>	
Tarisa Morley	1546 Huddle Ave	<i>Tarisa Morley</i>	FH
MARIE Worrall	1201 ERIC DR	<i>Marie Worrall</i>	FH
DONALD Worrall	1201 ERIC DR	<i>Donald Worrall</i>	FH
BARBARA-BEAN	1201-ERIC-DR	<i>Barbara Bean</i>	FH
Patty Schreffler	1540 Huddle	<i>Patty Schreffler</i>	FH
Mariane Clagg	1598 Huddle	<i>Mariane Clagg</i>	FH
JEANINE Porter	1540 Huddle Ave	<i>Jeanine Porter</i>	FH

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

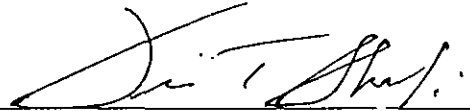
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Complainant	:	
vs.	:	
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

CERTIFICATE OF SERVICE

I, Francis T. Sbandi, hereby certify that I have this day served a copy of Lower Chichester Township's Reply to New Matter of PECO Energy Company in the above matter upon all interested parties by mailing a copy, properly addressed and postage prepaid to:

Ward L. Smith, Esquire
Counsel for PECO Energy Company
2301 Market Street S-23
Philadelphia, PA 19101-8699

Dated at Media, PA, September 2, 2014



FRANCIS T. SBANDI
Solicitor for Lower Chichester Township
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Media, PA 19063
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ATTORNEY FOR COMPLAINANT

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