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March 18, 2021

**VIA ELECTRONIC FILING**

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

Re: Petition of PECO Energy Company for a Finding of Necessity Pursuant to 53 P.S. § 10619 that the Situation of Two Buildings Associated with a Gas Reliability Station in Marple Township, Delaware County Is Reasonably Necessary for the Convenience and Welfare of the Public

Docket No. P-2021-3024328

Dear Secretary Chiavetta:

Enclosed please find PECO Energy Company's ("PECO's") Answer to the Petition to Intervene of Marple Township, Delaware County in the above referenced proceeding.

Copies have been served in accordance with the enclosed certificate of service, and PECO will serve additional parties as the Commission may direct.

Thank you for your attention to this matter.

Respectfully,

/s/ *Christopher A. Lewis*

Christopher A. Lewis

Enclosures

cc: Certificate of Service List (w/ *enclosures via first class mail or via electronic mail*)

**BEFORE THE  
COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company for a :  
Finding of Necessity Pursuant to 53 P.S. :  
§ 10619 that the Situation of Two Buildings : Docket No. P-2021-3024328  
Associated with a Gas Reliability Station in :  
Marple Township, Delaware County Is :  
Reasonably Necessary for the Convenience :  
and Welfare of the Public :  
:

**PECO ENERGY COMPANY’S ANSWER TO THE PETITION TO INTERVENE  
OF MARPLE TOWNSHIP, DELAWARE COUNTY**

Pursuant to Section to Section 5.61 of the Commission’s Regulations, 52 Pa. Code § 5.61,  
PECO Energy Company (“PECO”) hereby files the following Answer to the Petition to Intervene of  
Marple Township, Delaware County and avers as follows:

1. PECO does not oppose Marple Township’s participation as an intervenor in this proceeding.
2. PECO reserves the right to challenge any and all factual averments and legal conclusions set forth in the above-mentioned Petition to Intervene relating to PECO’s Petition.

Respectfully Submitted,  
BLANK ROME LLP

/s/ Christopher A. Lewis  
Christopher A. Lewis, Esq.  
Frank L. Tamulonis, Esq.  
Stephen C. Zumbrun, Esq.  
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*Counsel for PECO Energy Company*

Dated: March 18, 2021

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing Answer upon the parties listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party) via U. S. First Class Mail or via electronic mail.

**Via First Class Mail**

Tanya McCloskey  
Acting Consumer Advocate  
Office of Consumer Advocate  
555 Walnut Street  
Forum Place – 5<sup>th</sup> Floor  
Harrisburg, PA 17101-1921

**Via First Class Mail**

Richard Kanaskie  
Director and Chief Prosecutor  
Bureau of Investigation and Enforcement  
PA Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor West  
Harrisburg, PA 17120

**Via First Class Mail**

John R. Evans  
Small Business Advocate  
Office of Small Business Advocate  
Suite 1102, Commerce Building  
300 North Second Street  
Harrisburg, PA 17101

**Via First Class Mail**

Matthew J. Bilker, Esquire  
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Sloane, Matthews & Auslander, P.C.  
300 West State Street, Suite 300  
Media, PA 19063  
[mbilker@eckellsparks.com](mailto:mbilker@eckellsparks.com)  
*Solicitor for Marple Township Zoning  
Hearing Board*

**Via First Class Mail and E-Mail**

J. Adam Matlawski, Esquire  
Kaitlyn T. Searls, Esquire  
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*Solicitors for Marple Township*

*/s/ Frank L. Tamulonis*

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Counsel to PECO Energy Company

Dated: March 18, 2021