

**BEFORE THE
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 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

PROTEST OF BOB D'ORAZIO

Pursuant to 52 Pa. Code §§ 5.51, ET SEQ., Bob D'Orazio, 2148 Mary Lane, Broomall, PA, 19008 hereby files this Protest in the above-captioned proceeding. In support thereof, they state as follows:

1 Petitioner is Bob D'Orazio, residing for more than 15 years at 2148 Mary Lane, Broomall, PA 19008.

2 Bob D'Orazio is protesting PRO SE, and has no attorney. All documents should be served by electronic mail to bobdorazio44@gmail.com as provided in 52 Pa. Code § 1.54(b (3)

3 On February 26, 2021, PECO Energy Company (“PECO”) filed a Petition for a finding pursuant to 53 P.S. § 10619.

**BOB D'ORAZIO'S
INTEREST IN THE PROCEEDINGS**

4 Section 5.51 of the Public Utility Commission's regulations govern eligibility of parties to protest in PUC proceedings.

5 Bob D'Orazio objects to the approval of PECO's application filed with the Commission. Accordingly, Bob D'Orazio satisfies the Public Utility Commission's standards for protest set forth in 52 PA Code § 5.51(a)

**THE GROUNDS FOR BOB D'ORAZIO'S
PROTEST**

6 Marple Township officials and residents have made repeated attempts to provide alternative locations in industrial areas of the town, to which PECO continuously refuses. PECO petitioning the Public Utility Commission after being denied a Special Exception for the location is the exact opposite of working with the community that will be directly affected by this construction. As such, we are respectfully requesting a public hearing on this docket so that all affected stakeholders have the opportunity to hear this case and be heard.

7 In Paragraph 16 of PECO's filing, it is stated that, "...PECO considered at least ten sites in the vicinity but eliminated these alternatives due to size restrictions, zoning codes, availability, or distance from the gas main terminus." However, PECO has been unable to provide details about when, where, or how those ten or more sites were considered.

8 The proposed industrial natural gas "reliability" station at Sproul and Cedar Grove Roads in Marple Township would be one of the most ridiculous sites of this kind in the country. This plant would be surrounded by residential homes, businesses and a restaurant 40-50ft from the site. It will be releasing emissions from the smoke stacks and heaters right on top

of Freddy's restaurant which has outdoor seating for their customers - they are only 35-40 feet away.

9 We've been told by PECO's representatives, Michelle Garrity and others, that the amount of emissions produced by the plant on the small patch of land would be equivalent to 20+ homes. The amount of excessive heat from the natural gas heaters on the plant, especially in the summer, is a known factor and will impact the 8 residential homes within 100ft from the structure. There will be six heaters, and our research shows that each heater is capable of generating 4.6 million BTUs per hour, for a total heat output of 27.6 million BTUs per hour.

10 This facility is the first of its kind, and as an experimental facility, the amount of downdrafts of burning gasses, noise from changing gas pressures and other hazards have not been tested. I, along with others, have recommended at least 8 other locations zoned for such an operation, including sites in industrial zoned districts and more remote areas not far from this current proposed site. This industrial plant does not belong next to a shopping area, a restaurant and residences.

**BOB D'ORAZIO'S
REQUEST FOR RELIEF**

11 Bob D'Orazio protests in order to request the following relief:

11.1 That the commission schedule a series of public hearings on this docket so that all affected stakeholders have the opportunity to hear this case and be heard.

11.2 That the Commission deny PECO's request for relief as PECO has failed to demonstrate that the proposed facility is reasonably necessary or that the proposed location is reasonably necessary or appropriate.

WHEREFORE, Bob D'Orazio respectfully requests that the Commission grants this Petition to Protest, providing the protester with full-party status in this proceeding and any hearings or conferences held, and with the ability to comment.

Respectfully Submitted,

/ s /

Bob D'Orazio April 11, 2021

2148 Mary Lane

Broomall, PA 19008

bobdorazio44@gmail.com

610-633-2951

VERIFICATION

I, Bob D’Orazio, hereby verify that the facts contained in the foregoing pleading are true and accurate to the best of my knowledge and that I am duly authorized to make this verification, and that I expect to be able to prove the same at any hearing held in this matter.

Respectfully Submitted,

/ s /

Bob D’Orazio April 11, 2021

2148 Mary Lane

Broomall, PA 19008

bobdorazio44@gmail.com

610-633-2951

**BEFORE THE
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 : Docket No. P-2021-3024328
Buildings Associated with a Gas Reliability :
Station in Marple Township, Delaware :
County Is Reasonably Necessary for the :
Convenience and Welfare of the Public :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing Protest upon the parties listed below, in accordance with the requirements of 52 PA Code § 1.54 (relating to service by a participant) in the manner listed below upon the parties listed below:

<p>BY EMAIL Emily I. DeVoe Administrative Law Judge edevoe@pa.gov</p>	<p>BY EMAIL J. Adam Matlawski, Esq. Kaitlyn T. Searls, Esq. McNichol, Byrne & Matlawski, P.C. 1223 N. Providence Road Media, PA 19063 jjbyrne@mbmlawoffice.com ksearls@mbmlawoffice.com</p>
<p>BY EMAIL JACK R GARFINKLE ESQUIRE PECO ENERGY COMPANY 2301 MARKET STREET PO BOX 8699 PHILADELPHIA PA 19101-8699 215.841.6863 jack.garfinkle@exeloncorp</p>	<p>BY EMAIL CHRISTOPHER A LEWIS ESQUIRE FRANK L TAMULONIS ESQUIRE STEPHEN C ZUMBRUN ESQUIRE BLANK ROME LLP ONE LOGAN SQUARE 130 NORTH 18TH STREET PHILADELPHIA PA 19103 215-569-5793 lewis@blankrome.com ftamulonis@blankrome.com szumbrun@blankrome.com Representing PECO Energy Company</p>
<p>BY EMAIL TED UHLMAN uhlmantr@yahoo.com, HOLLY CROSS & JOHN CROSS crossh12@gmail.com, SARAH KUCHAN SarahKuchan@gmail.com,</p>	<p>BY EMAIL STEPHEN COLEMAN scc5153@psu.edu, LYNN GARRITY Lynne.metzler@gmail.com, JESSICA PAGLIARA javino0524@gmail.com.</p>

Respectfully Submitted,
/s/
Bob D'Orazio April 11, 2021
2148 Mary Lane
Broomall, PA 19008
bobdorazio44@gmail.com
610-633-2951