

April 11, 2021

Dear Secretary Chiavetta:

I am writing this letter in protest of the proposed location of PECO's "natural gas reliability station" and in support of the Marple Township Zoning Board's decision to deny the special exception for the proposed location of this "Reliability Station" at the corner of Sproul and Cedar Grove Roads in Broomall, Pennsylvania.

I am a resident of Marple Township, I have a child who is a student at the elementary school near the proposed location, and my family frequents the area of the proposed facility.

Some of my reasons for protest of this project at this location include:

1. PECO admitted during one meeting with Marple Township that this is facility is the "**first of its kind**" in the PECO network. I am very concerned that a natural gas facility of this kind that is of untested implementation is being placed in an area of such dense residential population! Its operational performance can only be estimated, and the noise study and its impact to local residents was only simulated. The proposed location is bordered on three sides by Broomall residents' homes, and along the fourth side by a popular family restaurant that is frequently packed with local residents and is often host to local community fundraisers. Beyond the restaurant in the non-residential portion of the area are properties that are always busy serving residents such as eateries, a convenience store, banks, and a gas fill station. Any issues with this "reliability station" could be catastrophic in terms of lives lost and property damaged!
2. This proposed location is in close proximity (<500 yards) to Russell Elementary School which houses students in grades K-5, including classrooms for students with special needs. These students will not be able to self-evacuate should there be an emergency at the "reliability station." They are 100% reliant on an adult to help them to safety.
3. This proposed location sits at a busy intersection which has been the site of many vehicular accidents. The speed limit is 40 mph but this is often exceeded. PECO also claimed that a collision of a truck with the proposed station cannot result in an explosion which is not entirely true. A spokesman for PECO said in a public forum via Zoom that if a truck collided with the facility, it would only result in a gas leak, not an explosion, because the natural gas is conveyed in an oxygen deficient environment and therefore cannot explode – this claim was meant to intentionally deceive the residents on the call who are not experts on this topic! The fact is that if the station were to be breached by a collision,

operating accident or other event, the natural gas would mix with the oxygen in the atmosphere and would potentially be explosive. PECO cannot legitimately claim that explosion or fire at such a facility is not possible, because it is.

4. There will be six large preheaters at the proposed location and their stacks will be 18 feet high. Venting of natural gas will be occurring at this proposed location, and natural gas is not emissions-free. Per the *Lancet Countdown on Health and Climate Change 2020: Policy Brief for the United States of America*, studies have found higher risk of asthma attacks and poor birth outcomes among communities living in proximity or downwind of oil and gas activity, and there are numerous other health risks associated with natural gas operations. A densely populated residential neighborhood is clearly not a proper location for a “natural gas reliability station.”
5. Our community was not properly notified of the plan to build this station which was also proposed in the middle of a global COVID-19 Pandemic. My neighbors and I only found out when reading comments on social media in October 2020. We have since been told that only a few people living within 150 feet of the proposed location were notified of the project. PECO then conducted a few Zoom meetings where concerned residents were given a three minute time slot to ask one question and receive an answer, which was entirely inadequate. Once a resident asked a question, they were muted on the call by PECO and unable to either ask a follow-up question or correct the understanding of the PECO representative who answered the question. In addition, PECO’s claim that they completed “extensive written communications with numerous local residents” is blatantly false.
6. PECO claims that this “reliability station” is part of a ten-year plan for future gas needs. How does one know that gas usage will actually increase when Pennsylvania’s goal is to develop more clean energy and move away from fossil fuels? Why should future potential residents and businesses be more important than currently existing residents and businesses?
7. During “community meetings” conducted via Zoom where residents were forcibly placed on mute by PECO, PECO refused to provide answers to important, detailed questions from concerned residents, for example: what types/models of heaters would be used, what type of contaminants would the heaters emit, what is the noise decibel output for the six heaters combined, what is the noise output of the backup generator(s), etc. These are important questions for which our Community deserves answers!

8. PECO claims that this “reliability station” must be located close to the existing gas main running along Sproul Road, and within a half-mile radius of Lawrence and Sproul Roads. In reality, PECO had initiated the installation of gas lines leading to the intersection of Sproul and Cedar Grove Roads well in advance of ever holding any meeting with the Community, way before anyone in the Township even knew that this station could exist. This station project appears to be purely a financial consideration lacking any Community safety considerations.
9. PECO claims to have investigated ten other locations for the placement of this “reliability station,” yet on a recorded Zoom call they stated that they only looked at a few potential locations which were all too far away. They were completely unfamiliar with other potential locations within the Township during this recorded meeting.

It is obvious that the decision to place the proposed PECO Natural Gas Expansion Plant location at Sproul and Cedar Grove Roads was made with disproportionate weight given to PECO’s convenience and cost considerations and with zero consideration for public safety and appropriateness of site selection. PECO has completely overlooked and undervalued public safety in selecting the proposed site and this facility should not be constructed where currently proposed.

Thank you,

/s/

Karen E. Spector

VERIFICATION

I swear that the facts I am presenting in this Protest are true and correct to the best of my knowledge, information, and belief. I understand that the statements I am making in this Protest are made subject to the penalties of 18 Pa. § Section 4904 (relating to unsworn falsification to authorities).

Respectfully Submitted,
/s/

Date: 11-APR-2021

Print Name: Karen E. Spector

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Broomall, PA 19008

Email: kspector@yahoo.com

Phone: 610-764-6224

**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 : Docket No. P-2021-3024328
 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 :

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>Emily I. DeVoe Administrative Law Judge Public Utility Commission 400 North Street Keystone Bldg. Harrisburg, PA 17120</p>	<p>JACK R GARFINKLE ESQUIRE PECO ENERGY COMPANY 2301 MARKET STREET PO BOX 8699 PHILADELPHIA PA 19101-8699 215.841.6863 jack.garfinkle@exeloncorp Accepts eService</p>
<p>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</p>	<p>KAITLYN T SEARLS ESQUIRE J. ADAM MATLAWSKI ESQUIRE MCNICHOL, BYRBE & MATLAWSKI, P.C. 1223 N PROVIDENCE ROAD MEDIA PA 19063 ksearls@mbmlawoffice.com amatlawski@mbmlawoffice.com Accepts eService</p>

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Accepts eService	
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Respectfully Submitted,
/s/

Date: 11-APR-2021

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