

VIA ELECTRONIC FILING

Rosemary Chiavetta
Secretary Pennsylvania Public Utility Commission
P.O. Box 3265 Harrisburg, PA 17105-3265

April 11, 2021

Re: Docket No. P-2021-3024328

Dear Secretary Chiavetta:

I am contacting you today to register my personal opposition to the petition of PECO to the PUC to overturn the decision of the Marple Township Zoning Commission of October 21, 2020. The reliability station is NOT reasonably “necessary for public convenience or welfare” and is actually a detriment to the growth and development of Marple Township. This station will NOT bring in jobs, will not attract visitors, and will not enhance the lives of our residents in anyway, but will instead decrease property values and desirability. In addition, PECO has not demonstrated any evidence of safety, and has not shared information on the other sites they claim to have investigated. Please see my official Protest, Verification, and Certificate of Service below.

**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 : Docket No. P-2021-3024328
Reliability Station in Marple Township, Delaware :
County Is Reasonably Necessary for the Convenience :
and Welfare of the Public :

PROTEST OF

Amy E Blake

Pursuant to 52 Pa. Code §§ 5.51, ET SEQ., Amy E Blake, 22 Stanfield Ave, Broomall, PA, 19008 hereby files this Protest in the above-captioned proceeding. In support thereof, they state as follows:

1 Petitioner is Amy E Blake, residing for more than 29 years at 22 Stanfield Ave, Broomall, PA 19008.

2 Amy E Blake is protesting PRO SE and has no attorney. All documents should be served upon the residence.

3 Amy E Blake consents to the service of documents by electronic mail to aeb817@gmail.com as provided in 52 Pa. Code § 1.54(b)(3)

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

PECO’s Petition seeks a finding that 1) the situation of two buildings for a proposed “Gas Reliability Station” is reasonably necessary for the convenience and welfare of the public, and therefore exempt from any zoning, subdivision and land development restriction of the Marple Township Subdivision and Land Development Ordinance and the Marple Township Zoning Code and 2) a proposed security fence appurtenant to the “Gas Reliability Station” is a “facility” under 66 PA C.S. § 102 and is therefore exempt from local zoning requirements.

**Amy E Blake’s
INTEREST IN THE PROCEEDINGS**

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

“A person objecting to the approval of an application filed with the Commission may file a protest to the application.” 52 PA Code § 5.51(a).

1 PECO proposes to construct and operate the “Gas Reliability Station” on a 0.536 acre portion of a 7.186 acre property, currently known as 2014 to 2090 Sproul Road, Marple Township, Delaware County, Pennsylvania. The proposed “Gas Reliability Station” is located in Marple Township, Delaware County, and is located in close proximity to residential dwellings, an elementary school, and commercial establishments.

2 Amy E Blake objects to the approval of PECO’s application filed with the Commission. Accordingly, Amy E Blake satisfies the Public Utility Commission’s standards for protest set forth in 52 PACode § 5.51(a)

**THE GROUNDS FOR AMY E BLAKE’S
PROTEST**

1 Marple Township officials and residents have made repeated attempts to provide suitable 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 in turn have our objections heard.

2 In PECO’s filing, PECO states, “...The Reliability Project, including the Gas Reliability Station, are necessary to meet the growing current and future demand for natural gas public

utility service in Delaware County....” (Paragraph 10). **Quite the opposite. Fossil fuel is a thing of the past, and as concerned citizens, we must look towards clean, sustainable energy solutions. In fact, in Pennsylvania, and nationally, residential natural gas consumption has been decreasing for years, as is clearly shown in the figures in Appendix A.**

3 In PECO’s filing, PECO states, (Paragraph 13), “...The construction of the Gas Reliability Station will support the public interest by providing an adequate, safe and reliable supply of natural gas to Delaware County to meet growing demand...” **However, there are no details concerning the safety of the proposed “Gas Reliability Station”, whether the topic is noise, pollution, or explosion. AS PECO HAS STATED, “THIS IS THE FIRST SUCH ANIMAL THAT WE HAVE CREATED.” Marple has no interest in being a guinea pig for this undertaking. In addition, this facility will be unmanned and monitored from a station in Conshohocken, making it highly unlikely that any episodes will be addressed quickly.**

4 PECO’s filing makes several references to “continuing to engage with local government” (Paragraph 12), “...extensive public outreach with local residents...” (Paragraph 18), “Following extensive public outreach...” (Paragraph 30), and “...continuing to work in good faith with the local government and residents...” (Paragraph 35). **In fact, there was no public outreach within the Township, and since the Zoning Board of Marple Township has refused PECO’s request, PECO has not worked “in good faith.” PECO continues to tear up our roads and lay pipes in defiance of this ruling. This has been a major traffic inconvenience and shows little evidence of PECO trying to work with the community and its residents. In addition, PECO has offered no information concerning the noise and/or pollution that would be created by the Reliability Station, other than to explain what would be done to minimize such events.**

5 In Paragraph 13 of PECO's filing, it is stated that, "...The Marple Township area experiences low pressure as compared to other areas in Delaware County, which will be alleviated by locating the Gas Reliability Station in Marple Township...". **However, PECO has failed to identify any details of said low pressure, and no record of any residential complaints has been documented. Additionally, when asked if the "Reliability Station" would increase natural gas supply in Marple Township, PECO was unable to reply affirmatively.**

6 In Paragraph 13 of PECO's filing, PECO contends "the natural gas system in Delaware County will become constrained no later than some point within the next 10 years.... under existing supply constraints, on a design day it might be necessary for PECO to procure natural gas supply on the spot market, with the price volatility that would be expected from accessing the spot market on an extreme weather day. The Reliability Project will reduce or eliminate the need to access the spot market." **I suggest that PECO instead uses the next 10 years to develop a safer, cleaner and more sustainable product to supply energy. Wind or solar energy solutions are viable solutions for PECO to consider for "new customers connecting to the system." According to Santa Energy "Natural gas is not renewable, which means we will eventually run out of natural gas reserves. Natural gas is primarily made of methane and is toxic in its natural state. When compared to carbon dioxide, unburned natural gas is almost 70 times more potent. Processed natural gas is also explosive, which can result in fatal leaks. In fact, natural gas explosions have long been a problem throughout history and are responsible for many severe injuries and fatalities.**

7 In Paragraph 15 of the filing, PECO states the site chosen for the Gas Reliability Station has several advantages: "(i) it is proximate to the new gas main terminus and the existing downstream network of gas mains serving Delaware County; (ii) it is an adequate size to

support the construction of the Gas Reliability Station; (iii) it was available for sale; and (iv) it is zoned for a public utility facility by special exception.” **This appears to be only advantageous for PECO, but not so much for the Township. The building of this facility and the “fence” (i.e. Brick wall) would restrict the sight line for drivers and be a potential cause for traffic accidents, which are already frequent at that corner. Any such accident would have to potential to ignite a dangerous and possibly deadly explosion in the proximity of the proposed station.** In addition, in Paragraph 12 of the filing, PECO rationalizes the need for this wall -- “The Security Fence will be constructed around the perimeter... because the Facilities are unmanned, (the “fence”) will serve the important functions of securing the sensitive Facilities located at the Property from tampering, vandalism, and other damage. The Security Fence will have the added public benefits of providing an absorptive barrier for sound as well as enhancing aesthetic appearance.” **As we all know, vandals intent on doing so can scale any wall and can cause immediate potential and possibly deadly threats to the surrounding neighborhood. Furthermore, a brick wall is NEVER aesthetic, and as the drawing shows, will not be in this case either.**

8 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. There are several other sites within Marple Township that would be more appropriate than a highly trafficked residential/commercial area. These options have been presented to PECO and rejected with no substantial feedback.**

**AMY E BLAKE'S
REQUEST FOR RELIEF**

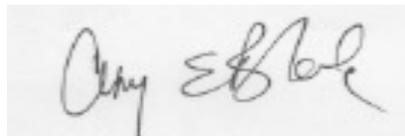
Amy E Blake protests in order to request the following relief:

- a. **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.**

- b. **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, Amy E Blake 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,

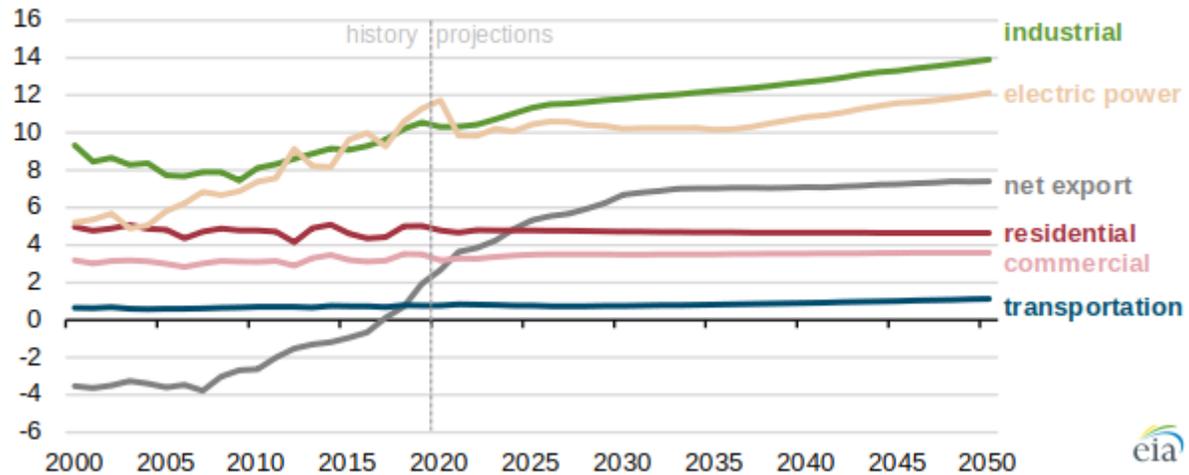


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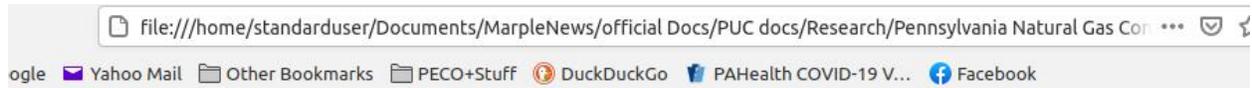
22 Stanfield Ave.
Broomall, PA 19008
Aeb817@gmail.com
610-353-4738

**APPENDIX A (PG 1 OF 2)
PAST AND FUTURE DEMAND FOR RESIDENTIAL GAS**

Annual U.S. natural gas consumption by sector and net exports (2000–2050)
trillion cubic feet



<https://www.eia.gov/todayinenergy/detail.php?id=46757>



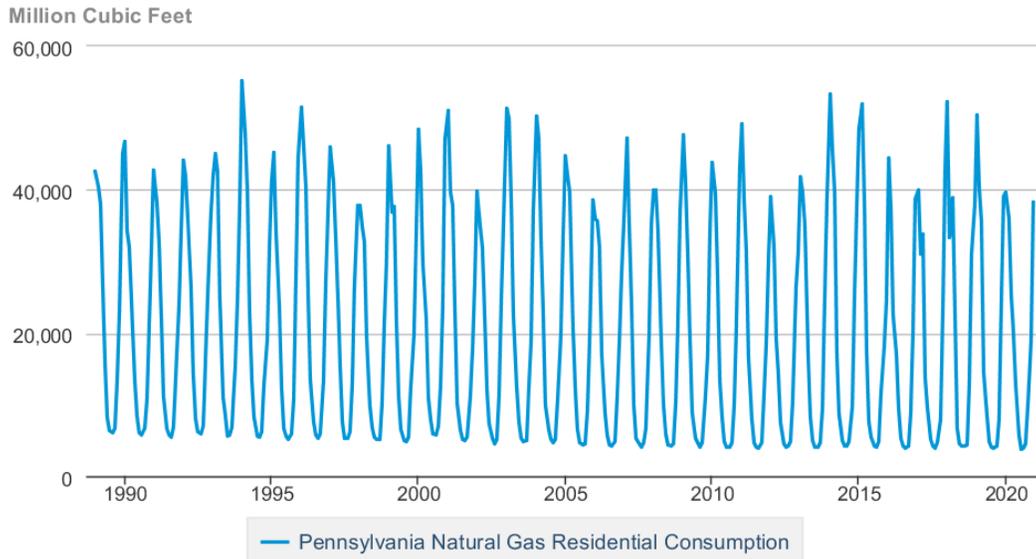
Natural Gas Consumption by End Use
(Million Cubic Feet)

Area: Period:

Show Data By:		Graph	Graph	2015	2016	2017	2018	2019	2020	View History
<input checked="" type="radio"/> Data Series	<input type="radio"/> Area	Clear	Clear							
Total Consumption	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1,255,621	1,301,000	1,350,245	1,460,456	1,612,589		1997-2019
Lease and Plant Fuel	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>							1967-1998
Lease Fuel	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	170,764	184,730	193,331	222,158	244,568		1983-2019
Plant Fuel	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3,478	3,868	2,427	3,156	3,102		1983-2019
Pipeline & Distribution Use	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	43,059	40,299	42,780	45,241	40,993		1997-2019
Volumes Delivered to Consumers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1,038,320	1,072,102	1,111,707	1,189,902	1,323,927	1,403,784	1997-2020
Residential	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	235,669	215,512	218,734	252,722	236,631	218,091	1967-2020
Commercial	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	152,091	142,724	145,912	165,119	161,624	146,505	1967-2020
Industrial	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	212,050	212,253	219,028	231,734	249,026	211,483	1997-2020
Vehicle Fuel	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	534	497	1,513	1,801	1,643	1,985	1988-2020
Electric Power	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	437,976	501,116	526,521	538,527	675,004	825,720	1997-2020

**APPENDIX A (PG 2 OF 2)
PAST AND FUTURE DEMAND FOR RESIDENTIAL GAS**

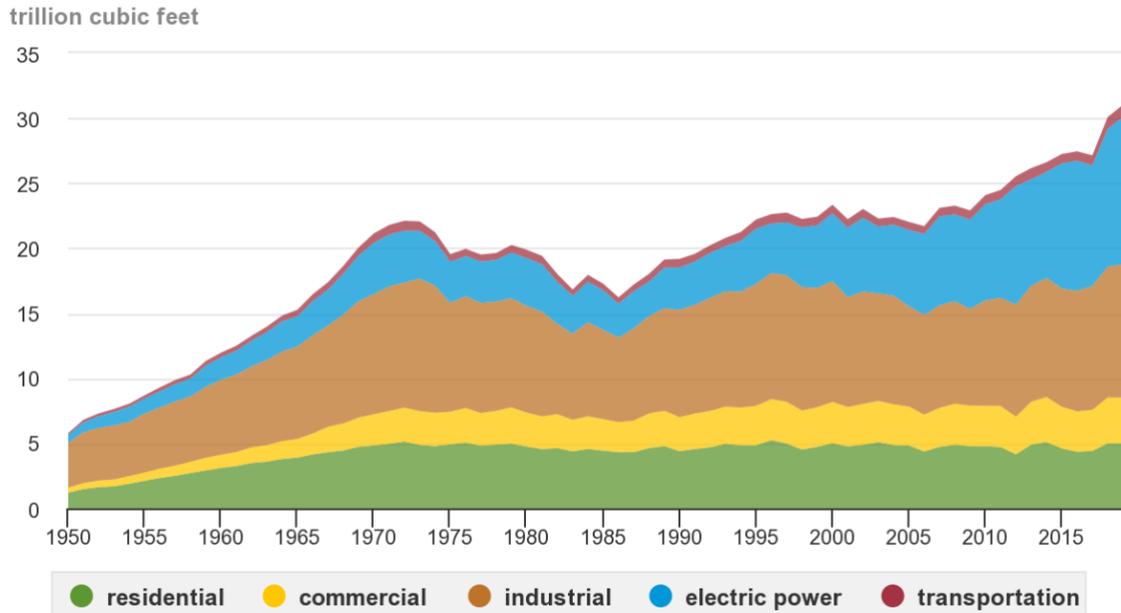
Pennsylvania Natural Gas Residential Consumption



<https://www.eia.gov/dnav/ng/hist/n3010pa2m.htm>

<https://www.eia.gov/energy/explai>

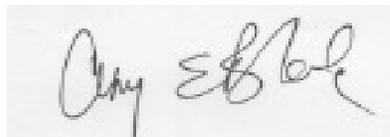
 Source: U.S. E **U.S. natural gas consumption by sector, 1950-2019**
[ned/natural-gas/use-of-natural-gas.php](https://www.eia.gov/ned/natural-gas/use-of-natural-gas.php)



 Source: U.S. Energy Information Administration, *Monthly Energy Review*, Table 4.3, June 2020, preliminary data for 2019

VERIFICATION

I, Amy E Blake, 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.

A handwritten signature in black ink that reads "Amy E Blake". The signature is written in a cursive style with a large initial "A" and "B".

April 11, 2021

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

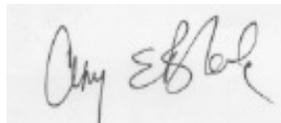
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Finding Of Necessity Pursuant to :
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Buildings Associated with a Gas Reliability :
Station in Marple Township, Delaware :
County Is Reasonably Necessary for the :
Convenience and Welfare of the Public :

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>

Respectfully Submitted,



April 11, 2021

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Broomall, PA 19008
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