

April 11, 2021

RE: Docket No. P-2021-3024328

Dear Your Honor,

I write this letter to oppose the location of the proposed PECO Gas Expansion Plant/Reliability Station at the corner of Sproul and Cedar Grove Roads. I'm a retired engineer with more than 40 years of environmental engineering experience and I wish to highlight the following points:

1. PECO admits that this is the "first of its kind" facility in the PECO network and they have no experience constructing or operating such a facility. That alone is a compelling reason not to locate this first of its kind facility in such close proximity to residential neighborhoods, Russell Elementary School, consumer business such as a fast food restaurant (Freddy's), a strip of small local business and a Wawa.
2. PECO's argument that a collision of a truck with the natural gas expansion plant cannot result in an explosion and/or fire is misleading. The Operations 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 engineered environment and therefore cannot explode. That's true if and only if the gas remains in the controlled conditions of the engineered facility. Once the system were breached by a collision, operating accident or other event, the natural gas would mix with the oxygen

in the atmosphere and potentially then be explosive. PECO cannot legitimately argue that explosion or fire at such a facility is not possible.

3. Another PECO spokesman (their attorney I believe) conflated the meaning of the word “gas” when he commented that this location was once a “gas station” and will now just be a “gas reliability station” as if gasoline and natural gas were the same thing. This is profoundly misleading. Gasoline and natural gas share the fact they are both derived from crude oil/fossil fuel deposits, but their physical and chemical properties and handling risks rapidly diverge from there through processing, distribution and end use. Liquid gasoline is not natural gas, and to suggest by the misuse of the word “gas” that they are is disingenuous and misleading to the public.
4. PECO argues that they must locate this facility proximal to the existing gas main running along Sproul Road. First, if the natural gas main is already there, what are they currently constructing along Sproul Road? Secondly, that proximity is predominantly a financial consideration, not an absolute must for facility location. Admittedly, it would be cheaper to locate this proposed facility where they are proposing due to both it's proximity to the existing and/or under construction gas main and the fact that the land was available for sale and probably at a relatively low per acre cost. However, that is purely a financial consideration, not a public safety consideration.
5. From a public safety perspective the proposed location is a very undesirable. There should be a defined

distance and closest land use criteria for the safe location of such a facility, especially since it's a first of its kind facility. This location appears to be selected predominantly based on project cost, not rational public safety criteria.

6. There is a large tract of mostly undeveloped land (only approximately 1 mile from the proposed site) across from St's Peter and Paul Cemetery between Home Depot/Wendy's and Cardinal O'Hare High School extending northeast to Reed Road and southeast to Route 476, where such a facility could be located while providing greater distance to homes and consumer businesses and still be proximal to the gas main/system connection point. Perhaps that land is not available and/or not available at the same low unit cost. Also perhaps the location of the Natural Gas Expansion Plant in that tract would limit future development of that land. However, for precisely the same reasons why future development would not want this facility located too close, existing businesses and existing residents don't want it too close either. Why should future potential residents and businesses be more important than currently existing residents and businesses? Since this undeveloped tract meets the proximity to gas main criteria, if over ruling local zoning via eminent domain is being considered, this location has clear public safety advantages over the currently proposed location.
7. Alternatively, it would be more advantageous from a public safety perspective to locate this proposed natural gas facility in the Lawrence Park Industrial Center rather than the currently proposed location. At least the

Industrial Park is already "industrial". PECO would argue that this is further from Sproul Road and therefore would require a new lateral gas main to feed and connect the expansion plant to the system. But again, that is predominantly a financial consideration, not a public safety consideration. Certainly there would be some short term risks associated with the construction the new lateral, but A) there will be short term construction risks associated with any location and B) short term risk management has obvious advantages over long term risk management.

It is apparent to me that the proposed PECO Natural Gas Expansion Plant location was made with disproportionate weight given to PECO's convenience and project costs considerations, not public safety. The site selection process should have first defined areas that meet defined and accepted public safety criteria and then within that geographic "safe" envelope, project cost, schedule and PECO convenience factors could optimize the final location. PECO seems to have overlooked, or at least undervalued, public safety considerations in selecting the proposed site. This facility should not be constructed where currently proposed.

Regards,

Ronald G. Fender
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Broomall, Pa. 19008

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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/

April 11, 2021

Date

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**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

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:

Emily I. DeVoe Administrative Law Judge Public Utility Commission 400 North Street Keystone Bldg. Harrisburg, PA 17120	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
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 Accepts eService	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

Respectfully Submitted,
/s/

April, 11 2021

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