

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION  
Docket No. P-2021-3024328

April 11, 2021

Dear Secretary Chiavetta,

I am writing to protest the approval of the petition filed by PECO that was published at Vol.51, No. 13 of the March 27, 2021 Pennsylvania Bulletin and assigned the docket no. above. The petition is for a finding of necessity pursuant to 53 P. S. Section 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.

I am a resident of Marple Town. My house is along Cedar Grove road though the mailing address is 1 Stanfield Lane. I live near and frequently walk and drive by the corner of Cedar Grove and Sproul roads. My family and I patronize Freddy's, Jacquette's Bakery, Fritsch's and othe. nearby businesses.

The site PECO selected for the gas reliability station, (or gate as it also was described by PECO), in a densely populated residential area is neither reasonably necessary nor convenient for the welfare of he public. Another site not located in a densely populated area would have been and remains a far better option. This message was made plain to PECO representatives again in the virtual open house PECO sponsored April 10, 2021 to get community input on the project. During the virtual open house a PECO representative stated PECO is still open to considering other properties. A number of locations were suggested during the open house by members of the community.

To understand the operations and function of the proposed gas reliability station (or gate), members of the community have repeatedly requested information about other PECO gas reliability stations in the area which would show what it is like to have one operating by seeing for ourselves where they have been located, what they look like, what they sound like and any impact of their operations. A PECO representative agreed to provide that information during the virtual open house. PECO had not agreed to provide that information before the virtual open house on April 10.

Questions were also raised again at the virtual open house about why the proposed site had to be secured and built in a densely populated residential neighborhood now when the current projected shortage of PECO delivery capability may be 10 years away. PECO needs to take the time and utilize the resources needed to thoroughly work with the community including considering locating the gas reliability station in a less densely populated neighborhood. To work toward that end with the community PECO needs to supply the information it has now stated it would. That is the start of seeking to work together in good faith. A revised landscape plan for the proposed site is not the issue. The location of the proposed gas reliability station and what that would mean is the issue to focus on to engage with the community. Working with the community and its leaders after the site has been approved, as stated at paragraph 35 of the Petition, is not constructive and does not constitute community engagement.

Respectfully submitted,



William D. Lenahan

1 Stanfield Lane  
Broomall, PA 19008  
717-585-2916  
[wlenahan@gmail.com](mailto:wlenahan@gmail.com)

## 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/

4/11/2021

Date

Name WILLIAM D. LENAHAN

Address 1 STANFIELD LANE  
BROOMALL, PA 19008

Email WDLLENAHAN@GMAIL.COM

Phone 717-585-2916

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

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 <a href="mailto:jack.garfinkle@exeloncorp">jack.garfinkle@exeloncorp</a> 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 <b>215-569-5793</b> <a href="mailto:lewis@blankrome.com">lewis@blankrome.com</a> <a href="mailto:ftamulonis@blankrome.com">ftamulonis@blankrome.com</a> <a href="mailto:szumbrun@blankrome.com">szumbrun@blankrome.com</a> Accepts eService	KAITLYN T SEARLS ESQUIRE J. ADAM MATLAWSKI ESQUIRE MCNICHOL, BYRBE & MATLAWSKI, P.C. 1223 N PROVIDENCE ROAD MEDIA PA 19063 <a href="mailto:ksearls@mbmlawoffice.com">ksearls@mbmlawoffice.com</a> <a href="mailto:amatlawski@mbmlawoffice.com">amatlawski@mbmlawoffice.com</a> Accepts eService

Respectfully Submitted,  
/s/

4/11/2021  
Date

Name WILLIAM D. LENAHA  
Address 1 STANFIELD LANE  
BROOMALL, PA 19008  
Email WDLENAHAN@GMAIL.COM  
Phone 717-585-2916