

**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

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**JULIA MARY (JULIA) BAKER’S PROTEST**

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Pursuant to 52 Pa. Code §§ 5.51, ET SEQ., Julie Baker, 2150 Sproul Road, Broomall, PA, 19008 hereby files this Protest in the above-captioned proceeding. In support thereof, they state as follows:

1           Petitioner is Julie Baker, whose family has owned the property at 2150 Sproul Road, Broomall, PA 19008 for over 65 years and who has resided there for more than 20 years.

2           Julie Baker’s residence is within 50 feet of the proposed “Gas Reliability Station”, well within the zone of likely death, dismemberment, injury and property damage in a catastrophic accident, subject to evacuation in the event of nearly any other accident, and very much within the area to be affected constantly by the noise and pollution caused by the facility.

3           Julie Baker is protesting PRO SE, and has no attorney. All documents associated with these proceedings should be served upon the residence.

4           Julie Baker consents to the service of documents by electronic mail to JBAKEROCA@MSN.COM, as provided in 52 Pa. Code § 1.54(b)(3)

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

6                   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.

**JULIA MARY (JULIE) BAKER’S  
INTEREST IN THE PROCEEDINGS**

7                   Julie Baker is a legal resident and citizen living at 2150 Sproul Rd, less than 50 feet from the proposed facility.

8                   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 address of the proposed station would be 2090 Sproul Rd. Broomall, PA 19008.

9                   Julie Baker is directly affected by the construction and operation of utility facilities and two associated buildings on the aforementioned lot.

10                  PECO’s plan includes electronic and telecommunication facilities which will be housed within the two buildings to, among other things, dampen any ambient sound generated by the “Gas Reliability Station”.

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

12           “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).

13           The proposed “Gas Reliability Station” is located in Marple Township, Delaware County, and is located in close proximity to residential dwellings and commercial establishments, including the residence of Julie Baker.

14           Julie Baker’s eligibility to protest is governed by Section 5.51 of the Public Utility Commission’s regulations, 52 PA Code § 5.51

15           Julie Baker has a direct and substantial interest in the instant proceeding, which is not, and cannot be, adequately represented by any other party. Accordingly, Julie Baker satisfies the Public Utility Commission’s standards for protest set forth in 52 PA Code § 5.51(a).

**THE GROUNDS FOR  
JULIA MARY (JULIE) BAKER’S  
PROTEST**

16           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). However, PECO has been unable or unwilling to show to the satisfaction of concerned government officials and citizens that current or future demand is growing at a rate that justifies this project. In fact, in Pennsylvania, and nationally, residential natural gas consumption has been decreasing for years, as is readily verifiable in public documents such the Energy Information Administration. In addition, a host of economic, technological, political and environmental factors, such as climate change,

sustainable energy solutions, and increased exports of LNG to Europe and China, combine to suggest that the growth in demand that is at the basis of this Gas Expansion Project is more than likely NOT going to happen.

17           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 acceptable details concerning the safety of the proposed "Gas Reliability Station," whether the topic is noise, pollution, or explosion. Additionally, there has been no satisfactory proof of growing demand, nor of the adequacy and reliability that would need to accompany PECO's filing. Writing as a pro se protestant, I have every reasonable indication to believe that this project would threaten my personal safety and welfare and not benefit me in any way- quite the opposite. Furthermore, I even requested a gas connection last summer, only to be ignored.

18           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). However, my own experience, as well as that of my neighbors, of the Marple Zoning Hearing Board, and of the Marple Township Board of Commissioners suggests that this is not true. Very few people in Marple Township, including those who live close to the facility itself, were aware of the plans for the development. I have first hand knowledge of this as I have attended all public meetings and have reached out to many members of the community personally.

19           In Paragraph 10 of PECO's filing, it is stated that, "PECO has not been able to subscribe for additional firm transportation capacity from the existing third-party natural gas transportation pipelines that supply Delaware County." However, PECO does not give any

details concerning the efforts that have been made to subscribe for firm transportation capacity from existing pipelines. There is a pipeline currently under replacement/expansion in lower DELCO and PECO has failed to clarify how these upgrades connect within the larger expansion.

20           In Paragraph 10 of PECO's filing, it is stated that the "Reliability Project" and the "Reliability Station" is needed to transport natural gas (...toward the constrained areas in Delaware County...). However, PECO does not, and has not identified any details about where or when these areas will be constrained. Nor have they

21           In Paragraph 12 of PECO's filing, PECO states "The Gas Reliability Station will involve the construction of a station building,...along with gas line heaters..." (Paragraph 12). Although the filing gives no other information about the heaters, information previously published by PECO implies that there will be six line heaters, and they will rarely be used. However, the basic function of the facility is to input natural gas at about 525 psi and output natural gas at about 100 psi, and so one or more heaters may be operating almost constantly in order to counteract the effects of cooling produced by this reduction in pressure. PECO has offered no substantive, let alone satisfactory information concerning the noise and/or pollution that would be created by the six line heaters. At 4.6MMBTU/hr each, they will emit the noise and exhaust fumes of 150- 300 household heaters (given 40k-80k BTU/hr for typical household heater. Various main and distribution line pressures have been mentioned in public meetings, but no details about whom will receive new connections, in what order, nor at what cost. PECO contends that these heaters are the industry standard, but they are only 80% efficient and do not recycle vapors through condensing units to increase the efficiency and reduce the pollution. PECO claims that they do not require a Clean Air Permit for this equipment, which given the heaters' output and the close neighborhood context any reasonable person would disbelieve.

22 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. Additionally, when asked about if the "Reliability Station" would increase natural gas supply in Marple Township, PECO was unable to reply affirmatively. Certainly their current installation of a 525 psi main provides amply pressure for a fairly wide distribution area.

23 Paragraph 14 finds much more detail in stating that the property "...was most recently occupied by a Texaco gasoline filling station...", but, in admitting that, "...A commercial property is located to the south side of the Property.", neglects to detail the fact that the commercial property is Freddy's Steakburgers, a highly popular, very successful, and usually crowded restaurant, often with long lines of cars waiting to purchase food along a driveup lane 30 feet south of the proposed location of the 6 4.6MMBTU/hr line heaters. Similarly, the heater exhaust fumes will blow directly towards the residences of Boxwood Drive under normal meteorological conditions.

24 In Paragraph 15, PECO states that the property "...is an adequate size to support the construction of the Gas Reliability Station..." However, 0.57 acres is NOT an adequate size for the operation of a "Gas Reliability Station." Moreover, there is ample reason to indicate that none of PECO's other stations are sited in such a densely developed area and immediately along a busy arterial state route and at an already congested and accident-prone intersection.

25 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 unwilling to provide details about when, where, or how those ten or more sites were considered.

**JULIA MARY (JULIE) BAKER'S  
REQUEST FOR RELIEF**

26            Julie Baker protests in order to request the following relief: 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. PECO has failed to show that the facility is needed to supply

**WHEREFORE**, Julie Baker 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/

Julie Baker

2150 Sproul Rd  
Broomall, PA 19008  
[jbakeroa@msn.com](mailto:jbakeroa@msn.com)  
(610) 745-8491

## VERIFICATION

I, (your full name here), 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/

Julia Mary (Julie) Baker

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**CERTIFICATE OF SERVICE**

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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:

J. Adam Matlawski, Esq. Kaitlyn T. Searls, Esq. McNichol, Byrne & Matlawski, P.C. 1223 N. Providence Road Media, PA 19063 <a href="mailto:amatlawski@mbmlawoffice.com">amatlawski@mbmlawoffice.com</a>	Christopher A Lewis, Esquire Blank Rome LLP 1 Logan Square Philadelphia, PA 19103-6998 <a href="mailto:lewis@blankrome.com">lewis@blankrome.com</a>
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Respectfully Submitted,

/s/  
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