

**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

JULIA MARY (JULIE) BAKER’S PETITION TO INTERVENE

Pursuant to 52 Pa. Code §§ 5.71, ET SEQ., Julia Mary (Julie) Baker, 2150 Sproul Road, Broomall, PA, 19008 hereby files this Petition to Intervene in the above-captioned proceeding. In support thereof, they state as follows:

1. Petitioner is Julia Mary (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 “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 petitioning 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.

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

7. Julia Mary (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 Station address would be 2090 Sproul Rd. Broomall, PA 19008.

9. I am directly affected by the construction and operation of the utility facilities and of the 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 5.72 of the Public Utility Commission's regulations govern eligibility of parties to intervene in PUC proceedings.

12. A petition to intervene is a proceeding is permitted for "an interest which may be directly affected and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceedings." 52 PA Code § 5.72(a)(2).

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 Julia Mary (Julie) Baker.

14. Julia Mary (Julie) Baker's eligibility to intervene is governed by Section 5.72 of the Public Utility Commission's regulations, 52 PA Code § 5.72

15. Julia Mary (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, Julia Mary (Julie) Baker satisfies the Public Utility Commission's standards for intervention set forth in 52 PA Code § 5.72(a)(2)

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

16. Julia Mary (Julie) Baker seeks intervention to request the following relief:

A) That the Commission deny PECO's request for the Finding that they are

requesting as PECO has failed or refused to provide adequate information, failed or refused to collaborate acceptably with local officials, and has failed or refused to demonstrate that the proposed facility is either reasonably necessary or reasonably appropriate, let alone without significant adverse effects upon local residents as well as to the community at large.

WHEREFORE, Julia Mary (Julie) Baker respectfully requests that the Commission grants this Petition to Intervene, providing the petitioner with full-party status in this proceeding and any hearings or conferences held, and with the ability to comment.

Respectfully Submitted,

/s/

Julia Mary (Julie) Baker

2150 Sproul Rd
Broomall, PA 19008
jbakeroca@msn.com
(610) 745-8491

VERIFICATION

I, Julia Mary (Julie) Baker, 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.

/s/

Julia Mary (Julie) Baker

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Finding Of Necessity Pursuant to :
53 P.S §10619 that the Situation of Two : Docket No. P-2021-3024328
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
Petition to Intervene 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 amatlawski@mbmlawoffice.com jjbyrne@mbmlawoffice.com ksearls@mbmlawoffice.com rsearch@mbmlawoffice.com	Christopher A Lewis, Esquire Blank Rome LLP 1 Logan Square Philadelphia, PA 19103-6998 lewis@blankrome.com ftamulonis@blankrome.com yanarsdale@blankrome.com szumbrun@blankrome.com
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Respectfully Submitted,

/s/

Julia Mary (Julie) Baker

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