

**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/

04/11/2021

Date

Name Maria Karamitopoulos

Address 802 St. Francis Dr., Broomall, Pa 19008

Email kyriamaryk@gmail.com

Phone 610-656-6069

**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 :

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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:

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/

04/11/2021

Date

Name   Maria Karamitopoulos    
Address   802 St. Francis Dr., Broomall, Pa 19008    
  
Email   kyriamaryk@gmail.com    
Phone   610-656-6069

04/11/2021

Dear Secretary Chiavetta:

I am writing this letter to support the Marple Townships zoning board's decision to deny the special exception in regards to the location of the proposed PECO Gas Expansion Plant/Reliability Station at the corner of Sproul and Cedar Grove Roads.

Some of my reasons are as follows:

1. THIS FACILITY IS ONE BLOCK FROM MY GRANDCHILDREN'S ELEMENTARY SCHOOL AND 2 BLOCKS FROM OUR HOME!!!! THERE IS NO EXCUSE FOR THIS TO BE LOCATED IN THIS PRIMARILY RESIDENTIAL AREA!!! PLEASE DO NOT ALLOW THEM TO BUILD THIS HERE, ANY EMERGENCY OR EVACUATION PUTS ALL OUR HOMES AND MORE IMPORTANTLY, OUR CHILDREN AT RISK. NO KILL SWITCH OR SHUTDOWN WILL SHELTER OUR CHILDREN... THEY WILL BE IN HARM'S WAY DUE TO PECO DEFYING OUR NEIGHBORHOOD AND PUSHING THIS RELIABILITY STATION INTO OUR RESIDENTIAL AREA UNDER THE CLOAK OF COVID 19. \*\*\*\*\*PLEASE HELP US!!!!\*\*\*\*\*
2. My community and I were not properly notified of the plan to build this expansion plant. I only accidentally found out when reading a neighbor's comment on social media in October 2020. It appears, only a few people living within 150 feet were notified. A few zoom meetings were held, where PECO selected who would attend each meeting. During these meetings PECO refused to answer detailed questions (i.e. what type/model of heaters would be used, what type of contaminants would they spew, what is the noise decibel output for these six heaters combined, etc.) and did not allow enough public input, limiting people to three minutes (which included the question and answer) and often muting people mid-sentence. Their claim to "extensive written communications with numerous local residents" is just not true.
3. During one meeting, PECO admitted that this is the "first of its kind" facility in the PECO network and they have no experience constructing or operating such a facility. I am very concerned that something that may not have been properly tested in such a location could be catastrophic in terms of lives lost and property damaged.
4. This lot is in close proximity to numerous residential homes, Russell Elementary School, a busy fast-food restaurant (Freddy's), and a strip of small local business including a Wawa. It also sits at a busy intersection which is prone to vehicular accidents. The speed limit is 40 mph, but is often exceeded.
5. 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 was 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.

6. 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 that 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" is disingenuous and misleading to the public.
7. PECO argues that they must locate this facility in close proximity to the existing gas main running along Sproul Road. They claim it must be within a ½ mile radius of Lawrence and Sproul Rds. But this was before they even began replacing pipe all along Sproul Rd for miles many months ago. This appears to be purely a financial consideration lacking any safety consideration. I see on the docket they claim to have looked at ten other locations, however on the recorded video they claim to have only looked at a few which were all too far away.
8. 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".
9. PECO argues this is part of a ten-year plan for future gas needs. Why should future potential residents and businesses be more important than currently existing residents and businesses? How do we know that gas usage will actually go up when Pennsylvania's goal is to develop more clean energy and move away from fossil fuels?
10. It is apparent to me that the proposed PECO Natural Gas Expansion Plant location at Sproul and Cedar Grove Roads 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.

11. Finally, we want to tell you that my family built a new home on St. Francis Drive because of this neighborhood. We spent over half of a million dollars and invested into our home and the quiet neighborhood. It is not fair that our investment and our grandchildren's welfare will be put danger due to PECO's disregard for the people of Marple and the rulings of our Township. There is a reason that the township refused their petition.

PLEASE HELP US, DO NOT LET THIS HAPPEN TO OUR NEIGHBORHOOD!!!

Sincerely,  
Mary Karamitopoulos  
802 St. Francis Drive  
Broomall, Pa 19008  
610-656-6067

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Respectfully Submitted,  
Mary Karamitopoulos

Date: 04/11/2021

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Respectfully Submitted,  
Mary Karamitopoulos

Date: 04/11/2021

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