

Rosemary Chiavetta, Secretary
PA Public Utility Commission
Commonwealth Keystone Bldg.
400 North Street
Harrisburg, PA 17120

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

Dear Secretary Chiavetta,

Enclosed please find Robert Jordan's Prehearing Memorandum in the above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,
/s/
Robert Jordan

cc by eService: Honorable Emily I. DeVoe, ALJ

**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 : P-2021-3024328
Reliability Station in Marple Township, Delaware :
County Is Reasonably Necessary for the :
Convenience and Welfare of the Public :

**PREHEARING CONFERENCE MEMORANDUM
OF [YOUR NAME]**

Pursuant to 52 Pa.Code § 5.222(d), and in response to the Prehearing Conference Order in the above-captioned matter, **Robert Jordan** provides the following information:

1 Introduction

1.1 On March 1, 2021, PECO filed with the Pennsylvania Public Utility Commission 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.

1.2 On April 9th, 2021, Robert Jordan filed a protest to Docket Number P-2021-3024328

1.3 The impact of the proposed substation would be a huge negative impact for the community I call home. With a good number of homes, businesses and an elementary school just yards away from the proposed location. I think there are too many variables when it comes to safety, pollution and noise. A major scare for me is in the respect that it could be a potential target for someone to cause an issue of danger on purpose (terrorism). I personally think it's an eyesore to negatively affect people that live here

and people who want to move into our town. This proposed substation in this location is a danger and embarrassment to our community.

2 Issues to be presented –

2.1 Marple Township residents, including myself, were not properly notified by PECO about its intent to build proposed gas plant at this location. It seems too late as if the residents were an afterthought.

2.2 Details about proposed gas plant have been withheld or misrepresented from PECO. We were told first of it's kind and then that there are plenty of other similar facilities. But for safety reasons we can't have address to "see" them. So that answer also makes me wonder about the same concern and safety of it being right here in my community.

2.3 PECO has not made any attempt to acquire any other location for this plant, and in fact has planned since the beginning of their project to place it at this location without any documentation regarding interaction with Marple Township. From what I have seen residents are on board with helping to find another more suitable location.

2.4 PECO continues to attempt to override zoning laws, regardless of the denial from the Marple Township Zoning Board, and the support of this denial from the Marple Township Commissioners, the Delaware County Council, and Marple Residents.

3 Service List – Robert Jordan wishes to be a Party of Record and to be on the Full Service List.

4 Witnesses

4.1 Robert Jordan will be a witness in these proceedings.

4.2 Robert Jordan reserves the right to call expert witnesses in the future as necessary.

5 Public Input Hearings – Robert Jordan respectfully requests a series of Public Input Hearings, so that the residents of Marple Township can Testify about their issues and concerns in this matter.

6 Site Visits – Robert Jordan respectfully requests a site visit to the corner of Sproul and Cedar Grove Rds in Marple Township, Delaware County, for the purpose of conducting an on-site hearing to view the property and listen to the specific concerns of this Party as to the potential effect of the Project. I am willing and able to assemble safely for this purpose.

7 Discovery – Robert Jordan defers to the attorneys for Marple Township and Delaware County.

8 Procedural Schedule

8.1 Robert Jordan will cooperate with the ALJ and the other Parties to create a reasonable procedural schedule for this matter.

9 Settlement

9.1 Robert Jordan will participate in settlement discussions that may arise during the pendency of this matter.

Respectfully Submitted,

/ S /

Robert Jordan
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610-357-3865
April 19th, 2021

**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 : P-2021-3024328
Reliability Station in Marple Township, Delaware :
County Is Reasonably Necessary for the :
Convenience and Welfare of the Public :

VERIFICATION

I, Robert Jordan, 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 / _____
Robert Jordan
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Broomall, PA 19008
rcjordanjr@gmail.com
610-357-3865
April 19th, 2021

**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 : 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 Prehearing Memorandum 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:

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April 19th, 2021