

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 Jeffrey Strong'S Prehearing Memorandum in the above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,
/s/
Jeffrey Strong

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 JEFFREY STRONG**

Pursuant to 52 Pa.Code § 5.222(d), and in response to the Prehearing Conference Order in the above-captioned matter, Jeffrey Strong 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 11th, 2021, Jeffrey Strong filed a protest to Docket Number P-2021-3024328

2 Issues to be presented

- 2.1 Marple Township residents were not properly informed or notified by PECO about the intent to build the referenced plant at this location. It seems as if work is late in progress, and the residents and township were an afterthought to PECO choosing this site.

2.2 Details about the proposed plant have been withheld or misrepresented from PECO.

The locations of similar facilities have been withheld due to safety reasons. Concerns about whether or not plants exist at sites similar to this one have not been addressed properly

2.3 There is no knowledge or facts indicating that PECO has attempted to acquire any other location for this plant, and in fact has planned since the beginning to place it at this location without involving the Township of Marple or any of its resident.

2.4 From the residents knowledge of their township, there are many other sites available that are more commercial and/or industrial in nature without restaurants, schools, homes, etc. in the immediate vicinity, and will most likely involve zero less zoning requirements.

2.5 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 – Jeffrey Strong wishes to be a Party of Record and to be on the Full Service List. Electronic service only of all documents should be served as follows: jeffstrong5150@gmail.com, Jeffrey Strong

4 Witnesses

4.1 Jeffrey Strong will be a witness in these proceedings.

4.2 Jeffrey Strong reserves the right to call expert witnesses in the future as necessary.

5 Public Input Hearings – Jeffrey Strong 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 – Jeffrey Strong 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 – Jeffrey Strong defers to the attorneys for Marple Township and Delaware County.

8 Procedural Schedule

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

9 Settlement

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

Respectfully Submitted,

/ S /

Jeffrey Strong
8 Grove Lane
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610.453.6625
04/19/2021

**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, Jeffrey Strong, 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 / _____
Jeffrey Strong
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Jeffstrong5150@gmail.com
610.453.6625
04/19/2021

**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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04/19/2021