

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 Anna Willig's Prehearing Memorandum in the above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,
/s/
Anna Willig

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 Anna Willig**

Pursuant to 52 Pa.Code § 5.222(d), and in response to the Prehearing Conference Order in the above-captioned matter, Anna Willig 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 12**, 2021, Anna Willig filed a protest to Docket Number P20213024328
- **2 Issues to be presented** – I reside at 640 Cedar Grove Road with my adult daughter who has special needs. PECO has failed to provide adequate information regarding the safety of the surrounding residential and elementary school community, site selection, facility structure, emissions, noise, and barriers/aesthetics. PECO continues with plans for this experimental facility despite the denial from Marple Township zoning board, township commissioners and residents.
- **Service List** – Anna Willig wishes to be a Party of Record and to be on the Full Service List.

- **Witnesses**

- **Anna Willig** will be a witness in these proceedings.

Public Input Hearings – Anna Willig 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.

- **Site Visits** – Anna Willig 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.
- **Discovery** – Anna Willig defers to the attorneys for Marple Township and Delaware County.
- **Procedural Schedule**
 - Anna Willig will cooperate with the ALJ and the other Parties to create a reasonable procedural schedule for this matter.
- **Settlement**
 - Anna Willig will participate in settlement discussions that may arise during the pendency of this matter.

Respectfully Submitted,

/ S /

Anna Willig

640 Cedar Grove Road
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610-213-1029
April 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, Anna Willig, 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 / _____
Anna Willig
640 Cedar Grove Road
Broomall,PA 19008
anna413@comcast.net
610-213-1029
April 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 Reliability Station in Marple Township, Delaware County Is Reasonably Necessary for the Convenience and Welfare of the Public :
: Docket No. P-2021-3024328
:
:

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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Respectfully Submitted,

/ s /

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[DATE, 2021]