

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 JOHN D CALLAGHAN'S Prehearing Memorandum in the  
above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,  
John Callaghan

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 :

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**PREHEARING CONFERENCE MEMORANDUM  
OF JOHN CALLAGHAN**

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Pursuant to 52 Pa.Code § 5.222(d), and in response to the Prehearing Conference Order in the above-captioned matter, **John D Callaghan** 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 p**, 2021, **John D Callaghan** filed a protest to Docket Number P-2021-3024328

1.3 **My concerns include the location of the proposed station in a highly traveled residential/retail business area-where not only will it be unsightly but potentially dangerous. Has PECO exhausted all means and alternate locations in the interest of the public? Have they operated in good faith?**

**2 Service List** – John D Callaghan wishes to be a Party of Record and to be on the Full Service List.

### **3 Witnesses**

**3.1 John D Callaghan** will be a witness in these proceedings.

**3.2** John D Callaghan reserves the right to call expert witnesses in the future as necessary.

**4 Public Input Hearings –John D Callaghan** 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-including safety,long term viability etc.

**5 Site Visits** – John D Callaghan 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.

**6 Discovery** – John D Callahan defers to the attorneys for Marple Township and Delaware County.

### **7 Procedural Schedule**

**7.1** John D Callaghan will cooperate with the ALJ and the other Parties to create a reasonable procedural schedule for this matter.

### **8 Settlement**

**8.1** John D Callaghan will participate in settlement discussions that may arise during the pendency of this matter.

Respectfully Submitted,

John D Callaghan  
17 Tower Rd.  
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610-212-4112  
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 :

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**VERIFICATION**

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I, [YOUR NAME], 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,

John D Callaghan  
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610-212-4112  
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 :

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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 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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