

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 Gregory Fat's Prehearing Memorandum in the above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,
/s/
Gregory Fat

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 Gregory Fat**

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

1.3 Gregory Fat is a resident of Marple Township and resides with family approximately 1000ft from the proposed gas plant site.

2 Issues to be presented – Upon review of this matter, the issues to be presented include:

2.1 PECO has not defined risks, noise levels, pollutants a facility such as this would produce.

2.2 The proposed plant is not within zoning requirements, which were established to promote the health and safety of residents in Marple Township.

2.3 PECO has not provided information on the demand or constraints they face that would suggest a plant, such as the one proposed, are necessary. The materials they have provided suggest that there may be a demand constraint within 10 years, however, PECO has not substantiated that claim.

2.4 The proposed location is situated in an area that would restrict visibility in a busy intersection, and be a potential hazard to homes and businesses that surround it. PECO has not provided any evidence of searching for more suitable locations for this distribution facility.

2.5 I reserve the right to raise other issues as they arise.

3 Service List – Gregory Fat wishes to be a Party of Record and to be on the Electronic Full Service List.

4 Witnesses

4.1 Gregory Fat would testify during these proceedings.

4.2 Gregory Fat reserves the right to call expert witnesses in the future if necessary.

5 Public Input Hearings – Gregory Fat respectfully requests a minimum of two Public Input Hearings, so that the residents of Marple Township can Testify the issues and concerns in this matter. Due to Covid restrains, the Public Input Hearings should be conducted telephonically/online.

6 Site Visits – Gregory Fat 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.

7 **Discovery** – I will agree with any discovery schedule agreed upon by counsel for PECO, counsel for Marple Township, and counsel for Delaware County.

8 **Procedural Schedule**

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

9 **Settlement**

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

Respectfully Submitted,

/ S /

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(609)610-7819
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, Gregory Fat, 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 / _____
Gregory Fat
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Broomall, PA 19008
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(609)610-7819
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 : 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 19, 2021