

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 Marilia Mancini-Strong Prehearing Memorandum in the above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,
/s/
Marilia Mancini-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 MARILIA MANCINI-STRONG**

Pursuant to 52 Pa.Code § 5.222(d), and in response to the Prehearing Conference Order in the above-captioned matter, **MARILIA MANCINI-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 4/11/2021, **MARILIA MANCINI-STRONG** filed a protest to Docket Number P-2021-3024328

2 Issues to be presented

- 2.1 LOCATION- This location is a residential area, in the busiest intersections of Broomall, NEXT TO houses, restaurants, a few feet away from an elementary school and in front of a gas station. PECO had not perused any other location in Broomall to install this plant.

2.2 ZONING - PECO initiated construction without getting proper approvals from Marple Township Zoning board. After denial from the township, PECO continues to attempt to override zoning laws as the construction is too far into development and now is too late to turn back.

2.3 NEED - PECO yet needs to provide to the residents the actual need for this plant and the forecast gas supply and demand. We are still not convinced there is as real need for the construction of this plant.

3 Service List – Marilia Mancini-Strong wishes to be a Party of Record and to be on the Full Service List.

4 Witnesses

4.1 Marilia Mancini-Strong will be a witness in these proceedings.

4.2 Marilia Mancini-Strong reserves the right to call expert witnesses in the future as necessary.

4.3 If you have an expert witness whom you want to testify in the case, list and provide all contact information for any **expert witnesses** that would be testifying on your behalf, or else delete this part.

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

8 Procedural Schedule

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

9 Settlement

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

Respectfully Submitted,

/ S /

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4/11/2021

**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, Marilia Mancini-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 / _____
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**4/11/2021 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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4/11/2021