

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 Nicole Howarth's Prehearing Memorandum in the above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,
/s/
Nicole Howarth

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 NICOLE HOWARTH**

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

2 Issues to be presented

2.1 My neighbors and I were not notified in advance of PECO's plans to build a reliability station on this site. I have not received one piece of information directly from PECO. I only learned about this from asking for more information from my neighbors which is absolutely appalling.

2.2 This site is in the midst of a densely populated area which includes private homes, an elementary school, and local businesses. If a traffic accident or malicious act resulted in a breach of the facility, the results could be catastrophic in terms of lives lost and property damaged.

2.3 The proposed facility endangers the health of local residents. I have two young children, 3 and 1 years old. We hoped to live in our current home for life but must seriously consider if staying this close to a station is worth the safety of their lungs.

2.4 By PECO's own admission, this would be the first facility of its kind in the PECO system. My neighbors and I are very concerned that in this case, PECO "doesn't know what it doesn't know." They are experimenting with the lives of innocent people.

2.5 PECO argues that they must locate this facility in close proximity to the existing gas main running along Sproul Road. This appears to be purely a financial consideration lacking any safety consideration. There is a large Industrial Center around the corner they could use away from the general population.

3 Service List – Nicole Howarth wishes to be a Party of Record and to be on the Full Service List.

4 Witnesses

4.1 Nicole Howarth will be a witness in these proceedings.

4.2 Nicole Howarth reserves the right to call expert witnesses in the future as necessary.

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

8 Procedural Schedule

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

9 Settlement

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

Respectfully Submitted,

/ S /

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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, Nicole Howarth, 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 / _____
Nicole Howarth
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717-418-2296
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