

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 Maria Henderson's Prehearing Memorandum in the above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,
/s/
Maria Henderson

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 MARIA HENDERSON**

Pursuant to 52 Pa.Code § 5.222(d), and in response to the Prehearing Conference Order in the above-captioned matter, Maria Henderson 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 9, 2021, Maria Henderson filed a protest to Docket Number P-2021-3024328.
- 1.3 PECO's claim that the Situation of Two Buildings Associated with a Gas Reliability Station in Marple Township at the corner of Sproul and Cedar Grove Roads is reasonably necessary for the convenience and welfare of the Public is false.

2 Issues to be presented – Maria Henderson presents the following issues in this matter:

- 2.1 PECO has not been forthright in communicating with the Residents of Marple Township. Marple Residents were not appropriately and adequately notified of PECO's intentions and PECO continues to circumvent the issues that are important

to Marple Residents, that of safety. PECO responds to objections from its residents with the same “canned” verbiage instead of addressing legitimate concerns. There are still many Marple Residents who are unaware of this project.

2.2 PECO wants to locate this Gas reliability station on a small lot and in a heavily populated area. This location is on the corner of a high trafficked area, next to and surrounding homes, businesses and an elementary school and in a residential community where we live, work, and our children attend school. It is not an appropriate location. PECO has the option to build this at an appropriate alternate site, one with more space and located in an industrial zone. Other sites have been recommended to them, but PECO refused to consider them. PECO cited that other sites were explored but those sites that supposedly were explored were not made known.

2.3 PECO has provided no proof that this facility is safe for our residents with regard to emissions generated nor what would happen in the case of a leak, explosion or other emergency that would cause a catastrophic outcome. A representative from PECO stated that this station would be the first of its kind. Hence, they cannot assure our community safety.

2.4 PECO has provided no proof that this is necessary to provide gas to this community nor that there is an increased demand.

2.5 The Marple Zoning Board has denied their request for a special exception which is supported by the Marple Commissioners, the Delaware County Council, and Marple Residents. PECO, with their endless resources, are pursuing this legally instead of using their resources to locate a suitable site.

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

4 Witnesses

4.1 Maria Henderson will be a witness in these proceedings.

4.2 Maria Henderson reserves the right to call expert witnesses in the future as necessary.

5 Public Input Hearings – Maria Henderson 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. Specifically, all my neighbors and the people in the community that I know and associate with are in opposition to the location of this project.

6 Site Visits – Maria Henderson 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 – Maria Henderson defers to the attorneys for Marple Township and Delaware County.

8 Procedural Schedule

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

9 Settlement

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

Respectfully Submitted,

/ S /

Maria Henderson
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610-359-9843
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, Maria Henderson, 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 /

Maria Henderson
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Broomall, PA. 19008
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610-359-9843
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