

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 Sylva Baker's Prehearing Memorandum in the above-referenced proceeding.

This document has been duly filed via the Commission's eFiling system.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,

/s/  
Sylva Baker  
2150 Sproul Rd.  
Broomall, PA 19008  
sylvabaker@comcast.net  
610-256-0147

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 SYLVA BAKER**

---

Pursuant to 52 PA Code § 5.222(d), and in response to the Prehearing Conference Order in the above-captioned matter, **Sylva Baker** provides the following information:

**I. Background**

- A. 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.
- B. On April 18, 2021, Sylva Baker filed an Official Protest to Docket Number P-2021-3024328. I also filed a Petition to Intervene, with reasonable certainty that I am eligible for full legal standing in this matter, but since that decision rests with the ALJ, I submitted the Protest to ensure that I would be able to become a Party of Record.

**II. Issues to be Presented**

- A. Request for an extension of the filing period for an additional 45 days (60 total). I realize that the ALJ may specify the time period for filing, but I submit that a 15 day period is too short to allow the degree of public participation that this case deserves.

1. Based upon concerted outreach efforts by a local citizen's group, we found that very few Marple residents were aware of this reality and potential impacts of this project. Because we have found very nearly unanimous opposition among all contacted citizens, with many having become aware only within the past month, we have ample reason to believe that a significant number would still want to submit an Official Protest and participate in the proceedings.
2. This timing and nature of this case brings into serious question PECO's quality of service with respect to local government and community communication and collaboration. In point of fact their current Request of the Commission for a Finding of Necessity represents "a bridge too far" and flies in the face of usual and customary procedures by asking for the overriding of a Municipal Code. The Applicant should not receive the consideration of abbreviated timelines that would further hamper public engagement and greatly reduce the ability of the ALJ to be informed fully about the matters at hand from the stakeholders themselves.
3. The CoVID-19 pandemic has caused enormous stress to all citizens, exacerbated the complexities of community communication, and rendered civic engagement extremely burdensome given the extent and degree of serious concerns affecting everyone's ability to function physically, mentally and emotionally.

B. Support of our Township, County and State Officials Efforts to uphold Marple ZHB.

C. Questions Regarding the Necessity of the Project as Planned.

D. Serious Issues with Respect to Project's Impacts Health, Safety, and Welfare.

E. Problems Noted with Quality of Communication and Collaboration.

**III. Service List** – Sylva Baker wishes to be a Party of Record, and opts for Full Service.

**IV. Witnesses**

- A. Sylva Baker will be a witness in these proceedings.
- B. Sylva Baker reserves the right to call expert witnesses in the future as necessary.

**V. Public Input Hearings** – Sylva Baker respectfully requests a series of Public Input Hearings, so that the residents of Marple Township can enter statements and questions into the record concerning their issues and concerns in this matter.

**VI. Site Visits** – Sylva Baker respectfully requests a site visit to the corner of Sproul and Cedar Grove Roads 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.

**VII. Discovery** – Sylva Baker defers to the attorneys for Marple Township and Delaware County, and wishes to retain all Party rights to submit motions and pleadings in this matter.

**VIII. Suggested Procedural Schedule**

A. Revised deadlines for Submissions

- 1. Wednesday, May 26, 2021 – End of 60 Day period for Protest submissions
- 2. Wednesday, June 9, 2021 – End of Prehearing Memoranda submissions

B. Conferences, Public Input Hearings, Site Visit

- 1. Friday, June 10 – Prehearing Conference
- 2. First Public Input Hearing (6PM – 9PM)
- 3. Wednesday, July 14, 2021 – Second Public Input Hearing (6PM – 9PM)
- 4. Saturday, July 17, 2021 – Third Public Input Hearing as needed to allow all participants to be heard. *Alternatively, the ALJ may decide to hold as final PIH.*
- 5. Site Visit- at the ALJ's discretion having heard Public Input.

Sylva Baker will cooperate with the ALJ and the other Parties to create a reasonable procedural schedule for this matter.

**IX. Settlement**

A. Sylva Baker will participate in settlement discussions that may arise during the pendency of this matter.

Respectfully Submitted,

/ S /

Sylva Baker  
Broomall, PA 19008  
sylvabaker@comcast.net  
610-256-0417  
April 20, 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, Sylva Baker, 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 / \_\_\_\_\_  
Sylva Baker  
Broomall, PA 19008  
sylvabaker@comcast.net  
610-256-0417  
April 20, 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:

Emily I. DeVoe  
Administrative Law Judge  
edevoe@pa.gov

J. Adam Matlawski, Esq.  
Kaitlyn T. Searls, Esq.  
McNichol, Byrne & Matlawski, P.C.  
1223 N. Providence Road  
Media, PA 19063  
jjbyrne@mbmlawoffice.com  
ksearls@mbmlawoffice.com

Jack R. Garfinkle Esquire  
PECO Energy Company  
2301 Market Street  
PO BOX 8699  
Philadelphia PA 19101-8699  
215.841.6863  
jack.garfinkle@exeloncorp.com

Christopher A. Lewis Esquire  
Frank L. Tamulonis Esquire  
Stephen C. Zumbrun Esquire  
Blank Rome LLP  
One Logan Square  
130 North 18th Street  
Philadelphia, PA 19103  
215-569-5793  
lewis@blankrome.com  
ftamulonis@blankrome.com  
szumbrun@blankrome.com  
Representing PECO Energy Company

Robert W. Scott Attorney  
Carl E. Wald Robert W. Scott PC  
205 North Monroe Street  
Media PA 19063  
610-891-0108  
rscott@robertwscottpc.com  
carlewald@gmail.com

Ted Uhlman  
2152 Sproul Rd  
Broomall, PA 19008  
uhlmantr@yahoo.com  
484-904-5377

Holly Cross  
322 Candlewood Rd  
Broomall, PA 19008  
crossh12@gmail.com  
484-716-1353

John Cross  
322 Candlewood Rd  
Broomall, PA 19008  
jcross0209@gmail.com  
484-716-1354

Stephen Coleman  
100 N. Sproul RD  
Broomall, PA 19008  
scc5153@psu.edu  
717-586-4291

Jessica Pagliara  
18 Stanfield Lane  
Broomall, PA 19008  
avino0524@gmail.com  
215-499-3552

Lynne Redding  
104 Allison Circle  
Broomall, PA 19008  
lynne.metzler@gmail.com  
610-716-6660

Sarah Kuchan  
114 Martins Run  
Broomall, PA 19063  
sarahkuchan@gmail.com  
610-883-1089

Tracey Welsh  
2162 Mary Lane  
Broomall, PA 19008  
215-360-1818  
twelsh22@gmail.com

William A. Wegener  
22 Stanfield Lane  
Broomall, PA 19008  
wwegener@gmail.com  
610-353-4738

Natalie Zemaitis  
2651 Old Cedar Grove Rd.  
Broomall, PA 19008  
nattyz@hotmail.com  
215-668-1035

Lucinda L. Scace  
728 Cedar Grove Rd.  
Broomall, PA 19008  
cynsca@comcast.net  
610-353-3267



Nicole Howarth  
2508 Selwyn Drive  
Broomall, PA 19008  
nicolehowarth2@gmail.com  
717-418-2296

Jeffrey Strong  
8 Grove Lane  
Broomall, PA 19008  
Jeffstrong5150@gmail.com  
610-453-6625

Steven Welsh  
2162 Mary Lane  
Broomall, PA 19008  
215-360-1818  
twelsh22@gmail.com

Marilia Mancini-Strong  
8 Grove Lane  
Broomall, PA 19008  
mariliamstrong@hotmail.com  
610-731-9022

John D. Callaghan  
17 Tower Rd  
Broomall, PA 19008  
jdcalla1956@gmail.com  
610-212-4112

Robert Jordan  
2623 Springfield Road  
Broomall, PA 19008  
rcjordanjr@gmail.com  
610-357-3865

Andrew Redding  
104 Allison Circle  
Broomall, PA 19008  
andrewredding@gmail.com  
610-955-8862

Matthew Barrabee  
2959 Dogwood Lane  
Broomall, PA 19008  
mbarrabee@gmail.com  
267-767-6582

Casaundra DiDomenico  
114 S. Sproul Rd.  
Broomall, PA 19008  
Schwartzc14@gmail.com  
484-983-9573

Ashok Kailath  
2516 Parke Lane  
Broomall, PA 19008  
ashokkailath@yahoo.com  
610-420-1208

Carolina Favazza  
2006 Kerwood Dr  
Broomall, PA 19008  
Carolina.favazza@villanova.edu  
610-353-3314

Michael Pagliar  
18 Stanfield Ave  
Broomall, PA 19008  
Mikepags11@yahoo.com  
610-662-8602

Petra Svenson  
4 Hunters Run  
Broomall, PA 19008  
petrasvenson@msn.com  
610-389-4225

Richard Giovanetti  
1 Arbordale Lane  
Broomall, PA 19008  
Richard.giovanetii@g-sa.com  
610-547-5318

Joseph Colagreco  
2202 Rutgers Drive  
Broomall, PA 19008  
Colagreco@comcast.net  
610-389-2269

Maria Henderson  
1 Madonna Ln.  
Broomall, PA 19008  
mdhcpa@verizon.net  
610-359-9843

Norma Blum  
2164 Sproul Rd  
Broomall, PA 19008  
myspang7@comcast.net  
610-355-9554

Anna Masciantonio  
2739 Brierwood Rd  
Broomall, PA 19008  
anna2739@verizon.net  
610-353-4172

Linda Collins  
523 Warren Boulevard  
Broomall, PA 19008  
Lindacollins225@gmail.com  
610-220-4661

Marion H. Darby  
907 Cedar Grove Road  
Broomall, PA 19008  
mdarby232@gmail.com  
610-356-3213

Eileen Goldhorn  
196 Cranbourne Drive  
Broomall, PA 19008  
mrsgoldee@comcast.net  
610-329-6106

Marissa McGeehan  
2102 Boxwood Drive  
Broomall, PA 19008  
marissa.mcgeeahan@gmail.com  
484-431-7246

William D. Lenahan  
1 Stanfield Ln.  
Broomall, PA 19008  
wdlenahan@gmail.com  
717-585-2916

David Heagerty  
2102 Boxwood Drive  
Broomall, PA 19008  
marissa.mcgeeahan@gmail.com  
484-431-7246

Bob D'Orazio  
2148 Mary Lane  
Broomall, PA 19008  
bobdorazio44@gmail.com  
610-633-2951

Karen E. Spector  
403 Briar Drive  
Broomall, PA 19008  
kspector@yahoo.com  
610-764-6224

Maria S. Rich  
2691 Old Cedar Grove Rd.  
Broomall, PA 19008  
mariarich@verizon.net  
610-547-9337

Anna Willig  
640 Cedar Grove Rd  
Broomall, PA 19008  
anna413@comcast.net  
610-213-1029

Salvatore P. Favazza  
Jr. 2006 Kerwood Drive  
Broomall, PA 19008  
cnsspf@yahoo.com  
610-353-3314

Amy E. Blake  
22 Stanfield Ave.  
Broomall, PA 19008  
Aeb817@gmail.com  
610-353-4738

Alyssa Plotnick  
2203 Graymoor Drive  
Broomall, PA 19008  
dollgirl.plotnick27@gmail.com  
610-772-0030

Jill Adaman  
2160 Mary Lane  
Broomall, PA 19008  
Jea905@comcast.net  
484-574-7448

Gregory Fat  
2201 St. Paul Drive  
Broomall, PA 19008  
gregfat@gmail.com  
609-610-7819

Bridgett Wendel  
117 Academy Lane  
Broomall, PA 19008  
BridgettWendel@gmail.com  
610-353-1450

Ronald G. Fender  
2506 Parke Lane  
Broomall, PA 19008  
captainron73@yahoo.com  
610-574-4271

Anthony Marziano Jr.  
237 Talbot Drive  
Broomall, PA 19008  
managerptp@aol.com  
610-356-4666

Luisa Robbins  
411 Langford Rd  
Broomall, PA 19008  
luisa0411@hotmail.com  
610-550-9017

Nilgun Okur  
2163 Mary Lane  
Broomall, PA 19008  
nilgun.okur@gmail.com

Teresa DiCampli  
121 1<sup>st</sup> Ave  
Broomall, PA 19008  
tmdicampli@gmail.com  
484-995-6895

Charles Thomas Avedisian  
2150 Sproul Rd.  
Broomall, PA 19008  
Cta2@Cornell.edu  
607-592-7915

Henry & Linda Gillin  
2149 Mary Lane  
Broomall, PA 19008  
Lag46@aol.com  
484-886-9064

Julia Mary Baker  
2150 Sproul Rd  
Broomall, PA 19008  
jbakeroca@msn.com  
610-745-8491

Felicia Carnaroli  
252 Warren Blvd  
Broomall, PA 19008  
famoroso13@gmail.com  
484-574-4947

Sabina Amoroso  
2150 Kingswood Road  
Broomall, PA 19008  
famoroso13@rocketmail.com  
610-359-0588

Amanda Atkinson  
709 Cedar Grove Rd  
Broomall, PA 19008  
amanda.atkinson@gmail.com  
617-935-9712

Alessia Trader  
252 Warren Blvd  
Broomall, PA 19008  
trader4md@gmail.com  
215-459-2870

Kevin Pickering  
915 Cedar Grove Road  
Broomall, PA 19008  
mr.kevinpickering@gmail.com  
610-639-4818

Stephen Dimarco  
2084 Sproul Road  
Broomall, PA 19008  
sdimarco@pennoaksgolfclub.com  
610-316-4507

Kyriaki Karamitopoulos Felfelis  
2211 Glenspring Lane  
Broomall, PA 19008  
kyradesigns@att.net  
610-909-7449

Christos Felfelis  
2211 Glenspring Lane  
Broomall, PA 19008  
christosfelfelis@gmail.com  
610-733-2921

Maria Karamitopoulos  
802 St. Francis Dr  
Broomall, PA 19008  
kyriamaryk@gmail.com  
610-656-6069

Kosmas Yiantsos  
2228 Windsor Circle  
Broomall, PA 19008  
kyiantsos@hotmail.com  
215-588-0630

Respectfully Submitted,

/ s / \_\_\_\_\_  
Sylva Baker  
Broomall, PA 19008  
sylvabaker@comcast.net  
610-256-0417  
April 20, 2021