

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 Natalie Zemaitis's Prehearing Memorandum in the above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,  
/s/  
Natalie Zemaitis

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 :

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**PREHEARING CONFERENCE MEMORANDUM  
OF NATALIE ZEMAITIS**

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Pursuant to 52 Pa.Code § 5.222(d), and in response to the Prehearing Conference Order in the above-captioned matter, Natalie Zemaitis 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, Natalie Zemaitis filed a protest to Docket Number P-2021-3024328
- 1.3 Natalie Zemaitis along with her husband, is a resident of Marple Township for 7 years and is concerned about health and safety risks this project poses to her family and the community, particularly the elementary school less than 2000 feet from the proposed site and the homes sharing a property line and across the street from this proposed industrial gas plant.

**2 Issues to be presented-**

**2.1** PECO needs to provide scientific data on this type of technology that addresses air quality and noise pollution and the radius of negative impact.

**2.2** PECO needs to provide the community with a safety plan to address types of common malfunctions with this type of plant, response to each such problems and the probability of risk.

**2.3** The technology behind the protective barrier or “fence” needs to be disclosed to ensure it can adequately protect the gas reliability station from impact of commercial and motor vehicle accidents, which are frequent on the stretch of roadway of the proposed site.

**2.4** PECO needs to disclose the information which makes this site a suitable location and an unsuitable location for this project.

**3 Service List** – Natalie Zemaitis wishes to be a Party of Record and to be on the Full Service List.

**4 Witnesses**

**4.1** Natalie Zemaitis will be a witness in these proceedings.

**4.2** Natalie Zemaitis reserves the right to call expert witnesses in the future as necessary.

**5 Public Input Hearings** – Natalie Zemaitis 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** – Natalie Zemaitis 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** – Natalie Zemaitis defers to the attorneys for Marple Township and Delaware County.

**8 Procedural Schedule**

**8.1** Natalie Zemaitis will cooperate with the ALJ and the other Parties to create a reasonable procedural schedule for this matter.

**9 Settlement**

**9.1** Natalie Zemaitis 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 :

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**VERIFICATION**

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I, Natalie Zemaitis, 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/ \_\_\_\_\_  
Natalie Zemaitis  
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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 Reliability Station in Marple Township, Delaware County Is Reasonably Necessary for the Convenience and Welfare of the Public : : Docket No. P-2021-3024328

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**CERTIFICATE OF SERVICE**

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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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