

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 Amy Blake's Prehearing Memorandum in the above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,
/s/
Amy Blake

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 AMY BLAKE**

Pursuant to 52 Pa.Code § 5.222(d), and in response to the Prehearing Conference Order in the above-captioned matter, AMY BLAKE 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.

2 Issues to be presented

Based upon initial review of PECO's petition, Amy Blake has identified the following issues:

- a) I propose that PECO use the next 10 years to develop a safer, cleaner and more sustainable product to supply energy. Wind or solar energy solutions are viable solutions for PECO to consider for "new customers connecting to the system." Natural gas is not renewable, and we will eventually run out of natural gas reserves. Natural gas is primarily made of methane and is toxic in its natural state. When compared to carbon dioxide, unburned natural gas is almost 70 times more potent. Processed natural gas is also explosive, which can result in fatal leaks. In fact, natural gas explosions have long been a problem throughout history and are responsible for many severe injuries and fatalities, according to Santa Energy among others. We certainly do not need this threat in our highly populated neighborhood.

b) PECO has been unable to provide details about when, where, or how those ten or more sites were considered. There are several other sites within Marple Township that would be more appropriate than a highly trafficked residential/commercial area. These options have been presented to PECO and rejected with no substantial feedback.

c) There was no public outreach within the Township, and the Zoning Board of Marple Township has refused PECO's request. PECO has not worked "in good faith" and continues to tear up our roads and lay pipes in defiance of this ruling. This has been a major traffic inconvenience and shows little evidence of PECO trying to work with the community and its residents. In addition, PECO has offered no information concerning the noise and/or pollution that would be created by the Reliability Station, other than to explain what would be done to minimize such events.

2 Service List – Amy Blake wishes to be a Party of Record and to be on the limited Service List.

3 Witnesses

Amy Blake has not identified a witness that may be called, however, reserves the right to call a witness, or witnesses as necessary.

4 Public Input Hearings – Amy Blake 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.

5 Site Visits – Amy Blake 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.

6 Discovery – Amy Blake defers to the attorneys for Marple Township and Delaware County.

7 Procedural Schedule

7.1 Amy Blake will cooperate with the ALJ and the other Parties to create a reasonable procedural schedule for this matter.

8 Settlement

8.1 Amy Blake will participate in settlement discussions that may arise during the pendency of this matter.

Respectfully Submitted,

/S/

Amy Blake
22 Stanfield Avenue
Broomall, PA 19008
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610-353-4738
April 18, 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, Amy Blake, 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 / _____
Amy Blake
22 Stanfield Avenue
Broomall, PA 19008
Aeb817@gmail.com
610-353-4738
April 18, 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 18, 2021