

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 Kevin Pickering's Prehearing Memorandum in the above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,
/s/
Kevin Pickering

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 KEVIN PICKERING**

Pursuant to 52 Pa.Code § 5.222(d), and in response to the Prehearing Conference Order in the above-captioned matter, Kevin Pickering 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 19, 2021, Kevin Pickering filed a protest to Docket Number P-2021-3024328.
- 1.3 My family and I have lived on Cedar Grove Road for the last six years. We take frequent walks to Kent Park and love the food at Freddie's. My children attend the elementary school that, along with our home, is so close to the proposed site that we will surely bear the brunt of any noise, traffic, pollution, odors etc. that may occur. PECO does not care about the well-being of my family or any of the other concerned local citizens. Instead, they continue to thumb their collective noses at our township's

zoning laws and try to scare us by warning that customers are at risk of “not receiving the reliable natural gas service” if the so-called reliability station is not constructed in our community.

2 Issues to be presented

2.1 PECO has been less than transparent—and undeterred—by the potential environmental and safety issues associated with such a facility. They want us to trust them, but they refuse to share any information about the 30+ similar such stations in the region.

2.2 PECO claims to have considered at least ten sites within a two-mile radius of the Sproul/Lawrence Road natural gas main, but cited “zoning codes” as one of the reasons for not moving forward with any of these proposed sites. Why then are they so adamant about building the station in a location that is in direct opposition of the Marple Township Zoning Board?

2.3 PECO has cited the 3.5% growth in Delaware County’s natural gas this past year as a reason why this project is so critical. What does this figure actually indicate and what is the likelihood of the county’s natural gas capacity becoming constrained? Is this a fear tactic?

3 Service List – Kevin Pickering wishes to be a Party of Record and to be on the Full Service List. Electronic service only of all documents should be served as follows: mr.kevinpickering@gmail.com.

4 Witnesses

4.1 Kevin Pickering will be a witness in these proceedings.

4.2 Kevin Pickering reserves the right to call expert witnesses in the future as necessary.

5 Public Input Hearings – Kevin Pickering respectfully requests a series of Public Input Hearings, so that the residents of Marple Township can Testify about his issues and concerns in this matter.

6 Site Visits – Kevin Pickering 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 – Kevin Pickering defers to the attorneys for Marple Township and Delaware County.

8 Procedural Schedule

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

9 Settlement

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

Respectfully Submitted,

/ S /

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04/19/2021

**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, Kevin Pickering, 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 / _____

Kevin Pickering
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Broomall, PA 19008
mr.kevinpickering@gmail.com
610-639-4818
04/19/2021

**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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