

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 Lynne Redding's Prehearing Memorandum in the above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,  
/s/  
[Lynne Redding]

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 Lynne Redding**

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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, **Lynne Redding** 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 10, 2021, **Lynne Redding** filed a protest to Docket Number P-2021-3024328

1.3 Lynne Redding is a resident of Marple Township who resides approximately 1000ft from the proposed site along with her 4 young children. These children also attend the elementary school approximately 500ft from said proposed site.

**2 Issues to be presented-** Upon review of this matter, the issues to be presented are:

2.1 The proposed plant does not meet the proper zoning requirements, which are established by Marple Township to ensure the health and safety of its residents.

2.2 PECO has not discussed the noise level, pollutants being released, or the risks associated with this proposed plant.

2.3 PECO has not discussed the impact this proposed plant would have on the local elementary school as far as its pollutants, noise level, or to ensure its safe (from explosion, gasses, or any other unknown factors).

2.4 PECO has not provided essential materials or sources about why this plant is essential or necessary. Previous PECO reports actually show the opposite about gas consumption.

2.5 This proposed site is located at an extremely busy intersection which will limit visibility with both motor vehicles as well as pedestrians, and is in the middle of residential homes and local businesses which will be subject to potential hazards. PECO has not looked or shown evidence of looking for another location for proposed plant.

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

**4 Witnesses**

**4.1 Lynne Redding** will be a witness in these proceedings.

**4.2** Lynne Redding reserves the right to call expert witnesses in the future as necessary.

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

## **8 Procedural Schedule**

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

## **9 Settlement**

**9.1** Lynne Redding will participate in settlement discussions that may arise during the pendency of this matter.

Respectfully Submitted,

/ S /

Lynne Redding  
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610-716-6660  
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 :

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**VERIFICATION**

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I, Lynne Redding, 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 / \_\_\_\_\_  
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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 :

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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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April 20, 2021