

**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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**TED UHLMAN’S  
PREHEARING CONFERENCE MEMORANDUM**

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Pursuant to 52 Pa.Code § 5.222(d), and in response to the April 14, 2021 Prehearing Conference Order in the above-captioned matter, Ted Uhlman provides the following PreHearing Conference Memorandum:

1 Background

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 8, 2021, Ted Uhlman filed both a Protest and a Petition to Intervene to Docket Number P-2021-3024328.

1.3 On April 5 and 14,2021, ALJ DeVoe issued Orders detailing information about a Prehearing Conference to be held on April21, 2021, and that Protestants interested in remaining Parties of Record submit a PreHearing Memorandum on or before April 20, 2021.

## 2 The Issues

2.1 Request for an extension of the filing period for an additional 45 days (60 total), until

Thursday, May 27, 2021

2.2 The facility is not necessary.

2.2.1 PECO has shown no evidence to support their projections of future growth.

2.2.2 There is no reason for PECO to be delivering natural gas to Marple Township at 525psi., and then building a facility with above-ground pipes and six line heaters to reduce the pressure from 525psi to 99psi

2.3 This location and this facility is not a good match

2.4 The gas expansion plant will be noisy and will create extensive exhaust gasses

2.5 PECO should spend money repairing existing infrastructure, before creating new projects that waste money.

2.6 Ted Uhlman respectfully requests that, for the duration of the hearings, the terms “Gas Reliability Station” and “Gas Reliability Project” not be used, as these terms are prejudicial, unfairly casting the facility, as well as the project in general in a light that only a marketing professional can see by. Ted Uhlman respectfully requests the use of a more neutral term, such as “Natural Gas City Gate Station” or “Natural Gas Expansion Plant” or “Natural Gas Decompression Plant”.

2.7 The proposed Gas Expansion Plant is ugly.

2.7.1 PECO architects have been unable to develop a design that does not look like a Natural Gas Decompression Plant.

3 Service List – Ted Uhlman wishes to be a Party of Record and to be on the Full Service List.

4 Witnesses

4.1 Dr. Zhongping Huang, Ph.D., Professor, Founding Director of Biomedical Engineering, 130 Merion Hall, West Chester University, West Chester, PA 19383. His testimony will focus on application of the Joule-Thomson Cooling Equation, and how it relates to this facility.

4.2 Ted Uhlman will be a witness in these proceedings.

4.3 Ted Uhlman reserves the right to call expert witnesses in the future as necessary.

4.4 Mr. Tim Flanagan, PECO employee. 102 Gerstley Road, Hatboro, PA. His testimony will focus on statements that he made under oath at the meeting of the Marple Zoning Hearing Board, on October 21, 2020, concerning the safety of the proposed facility

5 a proposed litigation schedule,

5.1 Thursday, May 27, 2021 - amended deadline for protestants and interveners to file in the docket

5.2 Monday, May 31, 2021 – PreHearing Conference

5.3 Monday, June 14, 2021 – Discovery

5.4 Monday, June 21, 2021 – Site Visit

5.5 Monday, June 28 – First Public Input Hearing (6PM – 9PM)

5.6 Wednesday, July 14, 2021 – Second Public Input Hearing (6PM – 9PM)

5.7 Saturday, July 17, 2021 – Third Public Input Hearing (10AM – until the last person has been heard)

- 6 Public Input Hearings – Ted Uhlman 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.
- 7 Site Visit – Ted Uhlman 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.

Respectfully Submitted,

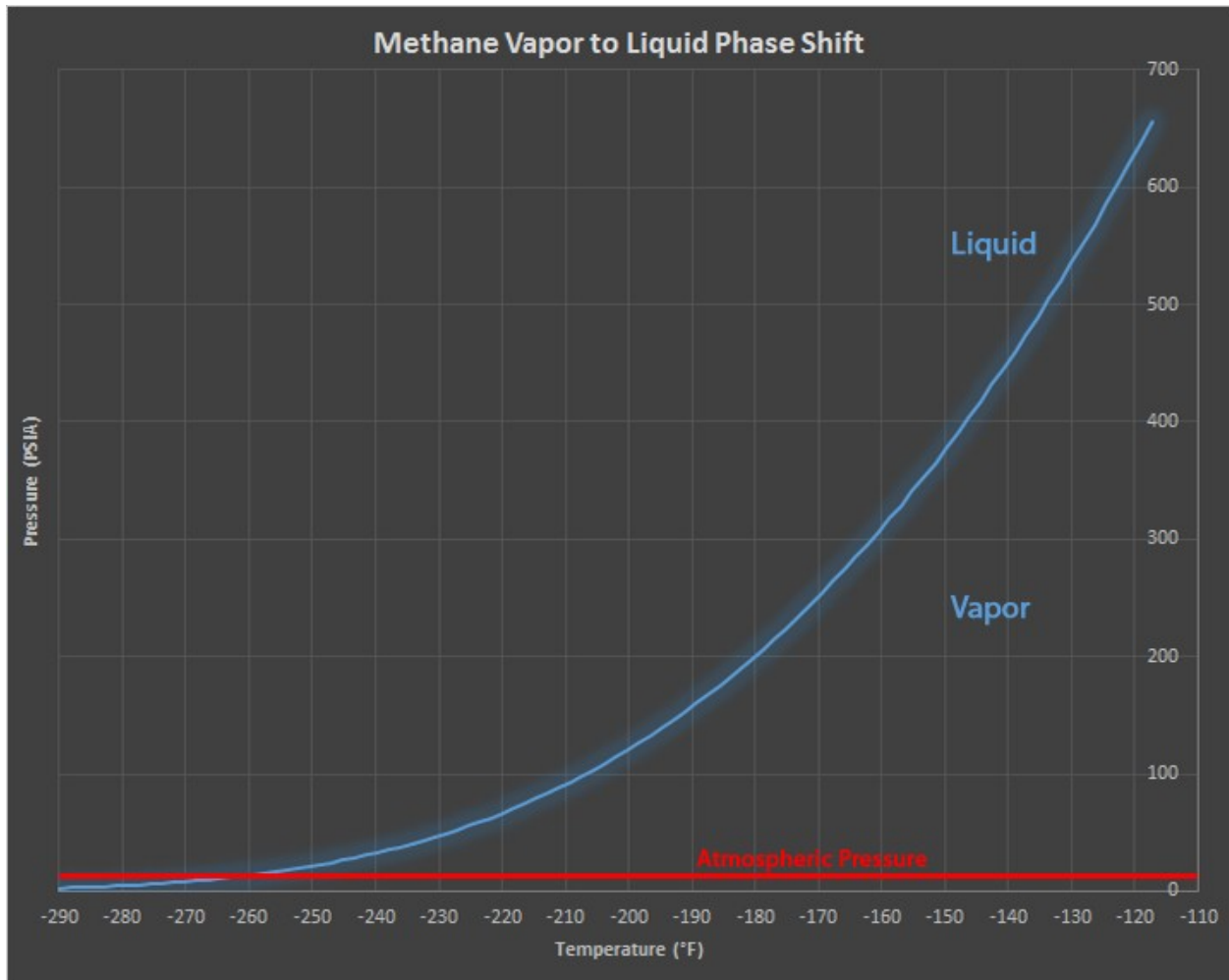


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**APPENDIX A**  
**TEMPERATURE AND PRESSURE OF METHANE**  
**LIQUID AND GAS BORDER**  
**(PAGE 1 OF 2)**

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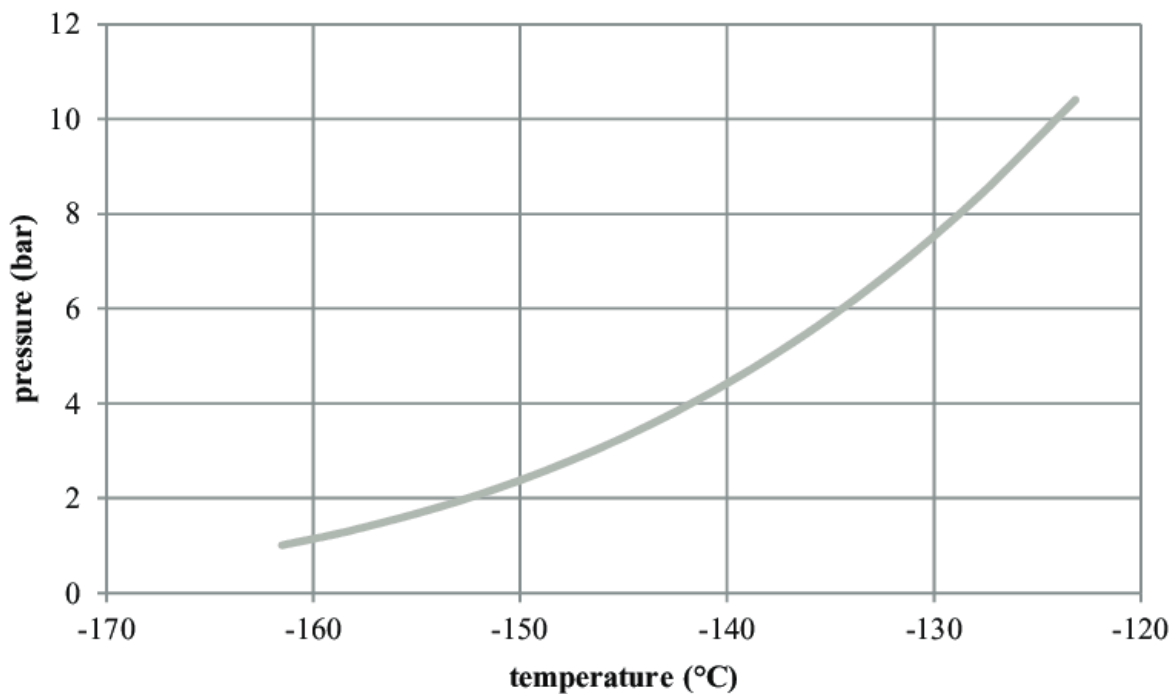


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**APPENDIX A**  
**TEMPERATURE AND PRESSURE OF METHANE**  
**LIQUID AND GAS BORDER**  
**(PAGE 2 OF 2)**

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[https://www.researchgate.net/figure/Saturation-curve-of-methane\\_fig3\\_257725734](https://www.researchgate.net/figure/Saturation-curve-of-methane_fig3_257725734)  
(April 16, 2021)

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**VERIFICATION**

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I, Theodore Robert (Ted) Uhlman, 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,



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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 Protest 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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