

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

Copies have been served per the attached Certificate of Service.

Respectfully submitted,
/s/ _____
[Andrew 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 :

**PREHEARING CONFERENCE MEMORANDUM
OF Andrew Redding**

Pursuant to 52 Pa.Code § 5.222(d), and in response to the Prehearing Conference Order in the above-captioned matter, **Andrew 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, **Andrew Redding** filed a protest to Docket Number P-2021-3024328

1.3 Andrew 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 – Andrew Redding wishes to be a Party of Record and to be on the Full Service List.

4 Witnesses

4.1 Andrew Redding will be a witness in these proceedings.

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

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

8 Procedural Schedule

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

9 Settlement

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

Respectfully Submitted,

/ S /

Andrew Redding
104 Allison Circle
Broomall, PA 19008
andwireding@gmail.com
610-955-8862
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 :

VERIFICATION

I, Andrew 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 / _____
Andrew Redding
104 Allison Circle
Broomall, PA 19008
andwireding@gmail.com
610-955-8862
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 :

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:

Emily I. DeVoe
Administrative Law Judge
edevoe@pa.gov

J. Adam Matlawski, Esq.
Kaitlyn T. Searls, Esq.
McNichol, Byrne & Matlawski, P.C.
1223 N. Providence Road
Media, PA 19063
jjbyrne@mbmlawoffice.com
ksearls@mbmlawoffice.com

JACK R GARFINKLE ESQUIRE
PECO ENERGY COMPANY
2301 MARKET STREET
PO BOX 8699
PHILADELPHIA PA 19101-8699
215.841.6863
jack.garfinkle@exeloncorp.com

CHRISTOPHER A LEWIS ESQUIRE
FRANK L TAMULONIS ESQUIRE
STEPHEN C ZUMBRUN ESQUIRE
BLANK ROME LLP
ONE LOGAN SQUARE
130 NORTH 18TH STREET
PHILADELPHIA PA 19103
215-569-5793
lewis@blankrome.com
ftamulonis@blankrome.com
szumbrun@blankrome.com
Representing PECO Energy Company

ROBERT W SCOTT ATTORNEY
CARL EWALD ROBERT W SCOTT PC
205 North Monroe Street
MEDIA PA 19063
6108910108
rscott@robertwscottpc.com
carlewald@gmail.com

Ted Uhlman
2152 Sproul Rd
Broomall, PA 19008
uhlmantr@yahoo.com
484-904-5377

Holly Cross
322 Candlewood Rd
Broomall, PA 19008
crossh12@gmail.com
484-716-1353

John Cross
322 Candlewood Rd
Broomall, PA 19008
jcross0209@gmail.com
484-716-1354

Stephen Coleman
100 N Sproul RD
Broomall, PA 19008
scc5153@psu.edu
717-586-4291

Jessica Pagliara
18 Stanfield Lane
Broomall, PA 19008
avino0524@gmail.com
215-499-3552

Lynne Redding
104 Allison Circle
Broomall, PA 19008
lynne.metzler@gmail.com
610-716-6660

Sarah Kuchan
114 Martins Run
Broomall, PA 19063
sarahkuchan@gmail.com
610-883-1089

TRACEY WELSH
2162 Mary Lane
Broomall, PA 19008
NO EMAIL

William A Wegener
22 Stanfield Lane
Broomall, PA 19008
wwegener@gmail.com
610-353-4738

Natalie Zemaitis
2651 Old Cedar Grove Rd.
Broomall, PA 19008
nattyz@hotmail.com
215-668-1035

Lucinda L. Scace
728 Cedar Grove Rd.
Broomall, PA 19008
cynsca@comcast.net
610-353-3267

William D. Lenahan
1 Stanfield Ln.
Broomall, PA 19008
wdlenahan@gmail.com
717-585-2916

Nicole Howarth2508
Selwyn Drive
Broomall, PA 19008
nicolehowarth2@gmail.com
717-418-2296

Jeffrey Strong
8 Grove Lane
Broomall, PA 19008
Jeffstrong5150@gmail.com
610-453-6625

STEVEN WELSH
2162 Mary Lane
Broomall, PA 19008
NO EMAIL

Marilia Mancini-Strong
8 Grove Lane
Broomall, PA 19008
mariliamstrong@hotmail.com
610-731-9022

John D. Callaghan
17 Tower Rd
Broomall, PA 19008
jdcalla1956@gmail.com
610-212-4112

Robert Jordan
2623 Springfield Road
Broomall, PA 19008
rcjordanjr@gmail.com
610-357-3865

Andrew Redding
104 Allison Circle
Broomall, PA 19008
andrewredding@gmail.com
610-955-8862

Matthew Barrabee
2959 Dogwood Lane
Broomall, PA 19008
mbarrabee@gmail.com
267-767-6582

Casaundra DiDomenico
114 S. Sproul Rd.
Broomall, PA 19008
Schwartzc14@gmail.com
484-983-9573

Ashok Kailath
2516 Parke Lane
Broomall, PA 19008
ashokkailath@yahoo.com
610-420-1208

Carolina Favazza
2006 Kerwood Dr
Broomall, PA 19008
Carolina.favazza@villanova.edu
610-353-3314

Michael Pagliar
18 Stanfield Ave
Broomall, PA 19008
Mikepags11@yahoo.com
610-662-8602

Petra Svenson
4 Hunters Run
Broomall, PA 19008
petrasvenson@msn.com
610-389-4225

Richard Giovanetti
1 Arbordale Lane
Broomall, PA 19008
Richard.giovanetii@g-sa.com
610-547-5318

Joseph Colagreco
2202 Rutgers Drive
Broomall, PA 19008
Colagreco@comcast.net
610-389-2269

Maria Henderson
1 Madonna Ln.
Broomall, PA 19008
mdhcpa@verizon.net
610-359-9843

Norma Blum
2164 Sproul Rd
Broomall, PA 19008
myspang7@comcast.net
61-.355-9554

Anna Masciantonio
2739 brierwood rd
Broomall, PA 19008
anna2739@verizon.net
610-353-4172

Linda Collins
523 Warren Boulevard
Broomall, PA 19008
Lindacollins225@gmail.com
610-220-4661

Marion H. Darby
907 Cedar Grove Road
Broomall, PA 19008
mdarby232@gmail.com
610-356-3213

Eileen Goldhorn
196 Cranbourne Drive
Broomall, PA 19008
mrsgoldee@comcast.net
610-329-6106

Marissa McGeehan
2102 Boxwood Drive
Broomall, PA 19008
marissa.mcgeeahan@gmail.com
484-431-7246

David Heagerty
2102 Boxwood Drive
Broomall, PA 19008
marissa.mcgeeahan@gmail.com
484-431-7246

Bob D'Orazio
2148 Mary Lane
Broomall, PA 19008
bobdorazio44@gmail.com
610-633-2951

Karen E. Spector
403 Briar Drive
Broomall, PA 19008
kspector@yahoo.com
610-764-6224

Maria S. Rich
2691 Old Cedar Grove Rd.
Broomall, PA 19008
mariarich@verizon.net
610-547-9337

Anna Willig
640 Cedar Grove Rd
Broomall, PA 19008
anna413@comcast.net
610-213-1029

Salvatore P. Favazza
Jr. 2006 Kerwood Drive
Broomall, PA 19008
cnsspf@yahoo.com
610-353-3314

Amy E Blake
22 Stanfield Ave.
Broomall, PA 19008
Aeb817@gmail.com
610-353-4738

Alyssa Plotnick
2203 Graymoor Drive
Broomall, PA 19008
dollgirl.plotnick27@gmail.com
610-772-0030

Jill Adaman
2160 Mary Lane
Broomall, PA 19008
Jea905@comcast.net
484-574-7448

Gregory Fat
2201 St. Paul Drive
Broomall, PA 19008
gregfat@gmail.com
609)610-7819

Bridgett Wendel
117 Academy Lane
Broomall, PA 19008
BridgettWendel@gmail.com
610-353-1450

Ronald G. Fender
250 6Parke Lane
Broomall, PA 19008
captainron73@yahoo.com
610-574-4271

Anthony Marziano Jr.
237 Talbot Drive
Broomall, PA 19008
managerptp@aol.com
610-356-4666

Luisa Robbins
411 Langford Rd
Broomall, PA 19008
luisa0411@hotmail.com
610-550-9017

Nilgun Okur
2163 Mary Lane
Broomall, PA 19008
nilgun.okur@gmail.com

TERESA DICAMPLI
121 1stAve
Broomall, PA 19008
tmdicampli@gmail.com
484.995.6895

CHARLES THOMAS AVEDISIAN
2150 Sproul R
Broomall, PA 19008
CTA2@CORNELL.EDU
607) 592-7915

HENRY & LINDA GILLIN
2149 Mary Lane
Broomall, PA 19008
Lag46@aol.com
484.886.9064

JULIA MARY BAKER
2150 Sproul Rd
Broomall, PA 19008
jbakeroca@msn.com
(610) 745-8491

FELICIA CARNAROLI
252 Warren Blvd
Broomall, PA 19008
famoroso13@gmail.com
484-574-4947

SABINA AMOROSO
2150 Kingswood Road
Broomall, PA 19008
famoroso13@rocketmail.com
610-359-0588

AMANDA ATKINSON
709 Cedar Grove Rd
Broomall, PA 19008
amanda.atkinson@gmail.com
617-935-9712

ALESSIA TRADER
252 Warren Blvd
Broomall, PA 19008
trader4md@gmail.com
215-459-2870

KEVIN PICKERING
915 Cedar Grove Road
Broomall, PA 19008
mr.kevinpickering@gmail.com
610-639-4818

STEPHEN DIMARCO
2084 Sproul Road
Broomall, PA 19008
sdimarco@pennoaksgolfclub.com
610-316-4507

KYRIAKI KARAMITOPOULOS FELFELIS
2211 Glenspring Lane
Broomall, PA 19008
kyradesigns@att.net
610-909-7449

CHRISTOS FELFELIS
2211 Glenspring Lane
Broomall, PA 19008
christosfelfelis@gmail.com
610-733-2921

MARIA KARAMITOPOULOS
802 St. Francis Dr
Broomall, PA 19008
kyriamaryk@gmail.com
610-656-6069

KOSMAS YIANTSOS
2228 Windsor Circle
Broomall, PA 19008
kyiantsos@hotmail.com
215-588-0630

Respectfully Submitted,

/s/ _____
Andrew Redding
104 Allison Circle
Broomall, PA 19008
andrewredding@gmail.com
610-955-8862
April 20, 2021