

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 Kosmas Yiantsos Prehearing Memorandum in the above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,
/s/
Kosmas Yiantsos

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 [Kosmas Yiantsos]**

Pursuant to 52 Pa.Code § 5.222(d), and in response to the Prehearing Conference Order in the above-captioned matter, **[Kosmas Yiantsos]** 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 [4/19/21], 2021, **[Kosmas Yiantsos]** filed a protest to Docket Number P-2021-3024328

Issues to be presented – PRIMARILY SAFETY in the residential area that PECO is proposing to build this site. Also, the value of our residential area when a CLEARLY INDUSTRIAL SITE IS PROPOSED FOR THE MAIN CORNER IN OUR NEIGHBORHOOD. I am in the process of building a home several blocks from this site and I would have never invested in the area if I had knowledge of such a site on the corner I drive past several times a day. PECO has pushed this through under the cover of the

pandemic, our local government has turned them down for good reason and they refuse to back down. Since it is such a priority for PECO, we are proposing that they move it down the street to a more suitable location.

2 Service List – Kosmas Yiantsos wishes to be a Party of Record and to be on the Full Service List.

3 Witnesses

3.1 Kosmas Yiantsos will be a witness in these proceedings.

3.2 Kosmas Yiantsos reserves the right to call expert witnesses in the future as necessary.

3.3 If you have an expert witness whom you want to testify in the case, list and provide all contact information for any **expert witnesses** that would be testifying on your behalf, or else delete this part.

4 Public Input Hearings – Kosmas Yiantsos 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 – Kosmas Yiantsos 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 – Kosmas Yiantsos defers to the attorneys for Marple Township and Delaware County.

7 Procedural Schedule

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

8 Settlement

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

Respectfully Submitted,

/ S /

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04/19/21

**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, Kosmas Yiantsos 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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04/19/21

**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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04/19/21