

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 Luisa Robbins Prehearing Memorandum in the above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,



Luisa Robbins

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 Luisa Robbins**

Pursuant to 52 Pa.Code § 5.222(d), and in response to the Prehearing Conference Order in the above-captioned matter, **Luisa Robbins** 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 20**, 2021, **Luisa Robbins** filed a protest to Docket Number P20213024328

1.3 Luisa Robbins is a resident of Marple Township who resides approximately 1000 feet from proposed site and does not feel this is the best place for this building.

2 Issues to be presented – the proposed plant doesn't meet the proper zoning requirements, which are established by the Marple Township to ensure the health and safety of its residents. PECO has not discussed the noise level, pollutants being released, or the risks associated with the proposed plant. PECO has not provided essential materials or sources about why this plant is essential or necessary. The proposed site is located at an extremely

busy intersection, located in the middle of a residential neighborhood, and across the street from a gas station.

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

4 Witnesses

4.1 Luisa Robbins will be a witness in these proceedings.

4.2 Luisa Robbins reserves the right to call expert witnesses in the future as necessary.

4.3 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.

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

8 Procedural Schedule

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

9 Settlement

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

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Luisa Robbins', with a long, sweeping flourish extending to the right.

Luisa Robbins
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April 20, 2021

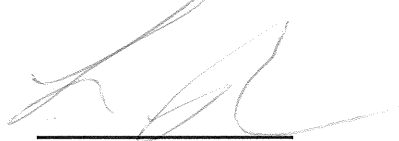
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company for a Finding :
Of Necessity Pursuant to 53 P.S. § 10619 that the :
Situation of Two 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, [YOUR NAME], 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,



Luisa Robbins
411 Langford Road
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Luisa0411@hotmail.com
610-550-9017
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:

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April 20, 2021