

dRosemary 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 Kyriaki Karamitopoulos Felfelis' Prehearing Memorandum in the above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,

/s/

Kyriaki Karamitopoulos Felfelis

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 KYRIAKI KARAMITOPOULOS FELFELIS**

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

1.3 My general interest in this matter is one of SAFETY. This structure belongs in an industrial area, without question. PECO has not presented any evidence that this would be safe in our neighborhood surrounded by homes and they should build it somewhere else.

2 Issues to be presented – PRIMARILY SAFETY in the residential area that PECO is proposing to build this site, IT IS LOCATED YARDS FROM OUR ELEMENTARY

SCHOOL!!! Also, the value of our residential area will go down because PECO is insists on putting this on a residential corner rather than an industrial area, where it belongs. 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. PLEASE SUPPORT OUR NEIGHBORHOOD AND LET PECO KNOW THAT THEY HAVE TO BE ACCOUNTABLE FOR THEIR ACTIONS. THEY BEGAN THIS CONSTRUCTION WITHOUT CONSENT FROM OUR TOWNSHIP AND ARE BULLYING US INTO THIS RELIABILITY STATION. THEY SHOULD MOVE IT TO A SUITABLE LOCATION AND WE WILL SUPPORT THEM. PLEASE DO NOT LET THEM RAILROAD OUR QUIET NEIGHBORHOOD!!!

3 Service List – [YOUR NAME] wishes to be a Party of Record and to be on the Full Service List.

4 Witnesses

4.1 Kyriaki Karamitopoulos Felfelis will be a witness in these proceedings.

4.2 Kyriaki Karamitopoulos Felfelis reserves the right to call expert witnesses in the future as necessary.

5 Public Input Hearings - Kyriaki Karamitopoulos Felfelis 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 – Kyriaki Karamitopoulos Felfelis 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 – Kyriaki Karamitopoulos Felfelis defers to the attorneys for Marple Township and Delaware County.

8 Procedural Schedule

8.1 Kyriaki Karamitopoulos Felfelis will cooperate with the ALJ and the other Parties to create a reasonable procedural schedule for this matter.

9 Settlement

9.1 Kyriaki Karamitopoulos Felfelis will participate in settlement discussions that may arise during the pendency of this matter.

Respectfully Submitted,

/ S /

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4/19/21

**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, [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,

/ s / _____
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4/19/21

**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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