

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 Steven Welsh's Prehearing Memorandum in the above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,  
/s/  
Steven Welsh

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 :

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**PREHEARING CONFERENCE MEMORANDUM  
OF STEVEN WELSH**

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Pursuant to 52 Pa.Code § 5.222(d), and in response to the Prehearing Conference Order in the above-captioned matter, STEVEN WELSH 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 9, 2021, Steven Welsh filed a protest to Docket Number P-2021-3024328

**2 Issues to be presented**

2.1 This is a high traffic corner where cars speed to catch a green light and prone to auto accidents.

2.2 This property is adjacent to private residences, an extremely busy group of small businesses and highly popular restaurant that is a supportive business partner in our community, regularly hosting busy fundraisers for all kinds of community agencies. These businesses will suffer if this is built here.

2.3 I live within one block and have serious safety concerns for our neighborhood including a nearby elementary school.

2.4 PECO by their own admission said this was a “first of its kind” station and refuses access to local fire and police agencies until their rep arrives which may take up to one hour.

2.5 PECO went against the wishes of our community and ruling of our township to seek approval from the PUC.

**3 Service List** – Steven Welsh wishes to be a Party of Record and to be on the Full Service List.

#### **4 Witnesses**

**4.1** Steven Welsh will be a witness in these proceedings.

**4.2** Steven Welsh reserves the right to call expert witnesses in the future as necessary.

**5 Public Input Hearings** – Steven Welsh 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** – Steven Welsh respectfully requests a site visit to the corner of Sproul and Cedar Grove Roads 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** – Steven Welsh defers to the attorneys for Marple Township and Delaware County.

#### **8 Procedural Schedule**

**8.1** Steven Welsh will cooperate with the ALJ and the other Parties to create a reasonable procedural schedule for this matter.

**9 Settlement**

**9.1** Steven Welsh will participate in settlement discussions that may arise during the pendency of this matter.

Respectfully Submitted,

/ S /

Steven Welsh  
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610-656-2247  
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 :

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**VERIFICATION**

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I, Steven Welsh, 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/ \_\_\_\_\_  
Steven Welsh  
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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 : 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 :

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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 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