

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 Karen E. Spector's Prehearing Memorandum in the above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,  
/s/  
Karen E. Spector

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 KAREN E. SPECTOR**

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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, Karen E. Spector 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 11, 2021, Karen E. Spector filed a protest to Docket Number P-2021-3024328

**2 Issues to be presented** – After attending several meetings with PECO, Karen E. Spector has identified the following issues with selection of the property at Sproul and Cedar Grove Roads in Broomall, PA for the Natural Gas Reliability Station:

2.1 PECO has initiated this project during a global COVID-19 Pandemic and notification to local residents has been seriously lacking throughout this project.

- 2.2 This proposed station is the first of its kind and is, therefore, of untested implementation. PECO has similar stations in their network but has admitted publicly during recorded meetings that they have never built this exact type of station. The station's safety is, therefore, unknown and should not be placed in a densely-populated residential neighborhood and next to a bustling shopping center frequented by local residents.
- 2.3 Venting of natural gas will be occurring at this proposed location from "pre-heaters" with 18-foot high stacks, and studies have found higher risk of asthma attacks and poor birth outcomes among communities living in proximity or downwind of gas activity, among other health risks.
- 2.4 The proposed location is in a busy intersection which has been the site of several vehicular accidents and it is not unreasonable to believe that a vehicular accident could physically impact the station and cause a serious incident.
- 2.5 The proposed location is also less than 500 yards from an Elementary school and any serious incidents at the proposed location could have serious implications for young students at this school.
- 2.6 While a noise "study" was conducted on paper, it was not completed in a real-life scenario. As stated previously, this proposed location is in a densely-populated area directly next to residents' homes and a shopping center. Noise levels could be constant in the winter from gas pre-heaters and would be a nuisance and potential health risk to our community.
- 2.7 PECO has not shared specifics with the community around heater and generator models despite repeated requests so that the local community can see manufacturer-

tested details around noise output. Local residents should have access to this information.

2.8 The proposed location would be surrounded on three sides by residents' homes and the placement of a public utility natural gas "reliability station" at this proposed location would most certainly have an adverse effect on local housing values.

2.9 Aside from being a health hazard to residents and a risk for a potential catastrophe, a public utility natural gas "reliability station" at this proposed location does not fit with the character of the neighborhood. It would be surrounded by an eight-foot wall at a major intersection which is zoned as "Neighborhood Center" and would be an eyesore in an otherwise beautiful community, leading to previously-mentioned drops in housing values.

**3 Service List** – Karen E. Spector wishes to be a Party of Record and to be on the Full Service List.

**4 Witnesses**

4.1 Karen E. Spector will be a witness in these proceedings.

4.2 Karen E. Spector reserves the right to call expert witnesses in the future as necessary.

**5 Public Input Hearings** – Karen E. Spector 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** – Karen E. Spector 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** – Karen E. Spector defers to the attorneys for Marple Township and Delaware County.

**8 Procedural Schedule**

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

**9 Settlement**

**9.1** Karen E. Spector will participate in settlement discussions that may arise during the pendency of this matter.

Respectfully Submitted,

/ S /

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April 19, 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, Karen E. Spector, 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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April 19, 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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