

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 Charles Thomas Avedisian's Prehearing Memorandum in the above-referenced proceeding.

This document has been duly filed via the Commission's eFiling system.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,  
/s/ \_\_\_\_\_  
Charles Thomas Avedesian  
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607-592-7915

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 CHARLES THOMAS (Tom) AVEDISIAN**

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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, **Tom Avedisian** provides the following information:

**I. Background**

- A. 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.
- B. On April 12, 2021, Tom Avedisian filed an Official Protest to Docket Number P-2021-3024328.

**II. Issues to be Presented**

- A. Request for an extension of the filing period for an additional 45 days (60 total). I realize that the ALJ may specify the time period for filing, but I submit that a 15 day period is too short to allow the degree of public participation that this case deserves.
1. Based upon concerted outreach efforts by a local citizen's group, we found that very few Marple residents were aware of the grim reality and potential impacts of this project. Because have found very nearly unanimous opposition among all contacted citizens, with many having become aware only within the past month, we have

ample reason to believe that a significant number would still want to submit an Official Protest and participate in the proceedings. Quite a few elderly residents living in close proximity to the proposed location are only very recently apprised of the situation, and most of them do not have access to email or to the PUC website. They would need additional time to prepare their documents and would have to mail them to the Commission and to Parties of Record.

2. This timing and nature of this case brings into serious question PECO's quality of service with respect to local government and community communication and collaboration. In point of fact their current Request of the Commission for a Finding of Necessity represents "a bridge too far" and flies in the face of usual and customary procedures by asking for the overriding of a Municipal Code. The Applicant should not receive the consideration of abbreviated timelines that would further hamper public engagement and greatly reduce the ability of the ALJ to be informed fully about the matters at hand from the stakeholders themselves.
3. The CoVID-19 pandemic has caused enormous stress to all citizens, exacerbated the complexities of community communication, and rendered civic engagement extremely burdensome given the extent and degree of serious concerns affecting everyone's ability to function physically, mentally and emotionally.

B. Support of our Township, County and State Officials Efforts to uphold Marple ZHB.

I will be prepared to make a well-reasoned, articulate and succinct statement on this issue.

C. Questions Regarding the Necessity of the Project as Planned.

I will be prepared to pose relevant questions, give answers as required, and make a well-reasoned, articulate and succinct statement on this issue, pending information yet to be made available through Discovery.

D. Serious Issues with Respect to Project's Impacts on Health, Safety, and Welfare.

I will be prepared to pose relevant questions, give answers as required, and make a well-reasoned, articulate and succinct statement on this issue, pending information yet to be made available through Discovery.

E. Problems Noted with Quality of Communication and Collaboration.

I will be prepared to pose relevant questions, give answers as required, and make a well-reasoned, articulate and succinct statement on this issue, pending information yet to be made available through Discovery.

F. I reserve the right to raise other issues as they arise.

**III. Service List** – Tom Avedisian wishes to be a Party of Record, and opts for Limited Service.

**IV. Witnesses**

A. Tom Avedisian will be a witness in these proceedings.

B. Tom Avedisian reserves the right to call expert witnesses in the future as necessary.

**V. Public Input Hearings** – Tom Avedisian respectfully requests a series of Public Input Hearings, so that the residents of Marple Township can enter statements and questions into the record concerning their issues and concerns in this matter.

**VI. Site Visits** – Tom Avedisian 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.

**VII. Discovery** – Tom Avedisian defers to the attorneys for Marple Township and Delaware County, and wishes to retain all Party rights to submit motions and pleadings in this matter.

**VIII. Suggested Procedural Schedule**

Tom Avedisian will cooperate with the ALJ and the other Parties to create a reasonable procedural schedule for this matter.

**IX. Settlement**

A. Tom Avedisian will participate in settlement discussions that may arise during the pendency of this matter.

Respectfully Submitted,

/ s /

Tom Avedisian

2150 Sproul Rd.

Broomall, PA 19008

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607-592-7915

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, Julia Mary Baker, 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 / \_\_\_\_\_  
Tom Avedisian  
Broomall, PA 19008  
Cta2@cornell.edu  
607-592-7915  
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