

BLANKROME
CELEBRATING **75**^{YEARS}

One Logan Square
130 North 18th Street | Philadelphia, PA 19103-6998

Phone: (215) 569-5793
Fax: (215) 832-5793
Email: lewis@blankrome.com

April 20, 2021

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Re: 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 PECO Energy Company's Answer to the Petition to Intervene of the County of Delaware. Copies have been served in accordance with the attached Certificate of Service.

Thank you for your attention to this matter.

Respectfully,

/s/ Christopher A. Lewis

Christopher A. Lewis

Enclosures

cc: Certificate of Service List (w/ encl.)

**BEFORE THE
COMMONWEALTH OF PENNSYLVANIA
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 : Docket No. P-2021-3024328
Associated with a Gas Reliability Station in :
Marple Township, Delaware County Is :
Reasonably Necessary for the Convenience :
and Welfare of the Public :

**PECO ENERGY COMPANY’S ANSWER TO THE PETITION
TO INTERVENE OF THE COUNTY OF DELAWARE**

Pursuant to Section to Section 5.61 of the Commission’s Regulations, 52 Pa. Code § 5.61, PECO Energy Company (“PECO”) hereby files the following Answer to the Petition to Intervene of County of Delaware and avers as follows:

1. PECO does not oppose the County of Delaware’s participation as an intervenor in this proceeding.
2. PECO reserves the right to challenge any and all factual averments and legal conclusions set forth in the above-mentioned Petition to Intervene relating to PECO’s Petition.

Respectfully Submitted,
BLANK ROME LLP

/s/ Christopher A. Lewis
Christopher A. Lewis, Esq.
Frank L. Tamulonis, Esq.
Stephen C. Zumbrun, Esq.
BLANK ROME LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103
Phone: 215.569.5793
Fax: 215.832.5793
Email: lewis@blankrome.com

Counsel for PECO Energy Company

Dated: April 20, 2021

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing Answer upon the parties listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party) via electronic mail unless otherwise indicated below.

Honorable Emily I. DeVoe
PO Box 3265
Harrisburg, PA 17105-3265
edevoe@pa.gov

KAITLYN T SEARLS ESQUIRE
J ADAM MATLAWSKI ESQUIRE
MCNICHOL, BYRBE & MATLAWSKI,
P.C.
1223 N PROVIDENCE ROAD
MEDIA PA 19063
ksearls@mbmlawoffice.com
amatlawski@mbmlawoffice.com
Accepts eService
Representing Marple Township

JILL ADAMAN
2160 Mary Lane
BROOMALL PA 19008
484-574-7448
jea905@comcast.net
Accepts EService

AMANDA ATKINSON
709 Cedar Grove Rd
BROOMALL PA 19008
617-935-9712
amanda.atkinson@gmail.com
Accepts EService

JULIA M BAKER
2150 Sproul Rd
BROOMALL PA 19008
6107458491 jbakeroca@msn.com
Accepts EService

ROBERT W SCOTT
ATTORNEY CARL EWALD
ROBERT W SCOTT
PC 205 North Monroe Street
MEDIA PA 19063
6108910108
rscott@robertwscottpc.com
carlewald@gmail.com
Accepts EService
Representing Delaware County

SABINA AMOROSO
2150 Kingswood Road
BROOMALL PA 19008
famoroso13@rocketmail.com
Accepts EService

Via Email and First Class Mail
CHARLES THOMAS AVEDISIAN
2150 Sproul Road
BROOMALL PA 19008
6075927915
cta2@cornell.edu

MATTHEW BARRABEE
2959 Dogwood Lane
BROOMALL PA 19008
2677676582
mbarrabee@gmail.com
Accepts EService

AMY BLAKE
22 STANFIELD AVE
BROOMALL PA 19008
6103534738
aeb817@gmail.com
Accepts EService

NORMA BLUM
2164 Sproul rd
BROOMALL PA 19008
Myspang7@comcast.net
Accepts EService

JOHN CALLAGHAN
17 TOWER RD
BROOMALL PA 19008
jdcalla1956@gmail.com
Accepts EService

FELICIA CARNAROLI
252 Warren Blvd
BROOMALL PA 19008
4845744947
famoro13@rocketmail.com
Accepts EService

JOSEPH COLAGRECO
2202 Rutgers Drive
BROOMALL PA 19008
6103892269 Colagreco@comcast.net
Accepts EService

STEPHEN COLEMAN
100 N Sproul Rd
BROOMALL PA 19008
7175864291
scc5153@psu.edu
Accepts EService

LINDA A COLLINS
523 Warren Blvd
BROOMALL PA 19008
610-220-4661
lindacollins225@gmail.com
Accepts EService

HOLLY CROSS
JOHN R CROSS
322 Candlewood Rd
BROOMALL PA 19008
4847161353
crossh12@gmail.com
Accepts EService

MARION H DARBY
907 Cedar Grove Road
BROOMALL PA 19008
mdarby232@gmail.com
Accepts EService

TERESA DICAMPLI
121 1st Ave
BROOMALL PA 19008
tmdicampli@gmail.com
Accepts EService

STEPHEN DIMARCO
PRESIDENT FREDDYS FROZEN
CUSTARD & STEAKBURGERS
2084 Sproul Road
BROOMALL PA 19008
6105477040
sdimarco@pennoaksgolfclub.com
Accepts EService

BOB DORAZIO
2148 Mary Lane
BROOMALL PA 19008
6103531910
bobdorazio44@gmail.com
Accepts EService

GREGORY FAT
2201 St Paul Drive
BROOMALL PA 19008
6096107819
gregfat@gmail.com
Accepts EService

RONALD G FENDER
2506 Parke Lane
BROOMALL PA 19008
captainron73@yahoo.com
Accepts EService

CAROLINA FAVAZZA
2006 Kerwood Dr
BROOMALL PA 19008
6105196412
Carolina.favazza@villanova.edu
Accepts EService

SALVATORE P FAVAZZA JR
2006 Kerwood Drive
BROOMALL PA 19008
(610) 353-3314
cnsopf@yahoo.com
Accepts EService

CHRISTOS FELFELIS
KYRIAKI KARAMITOPOULOS FELFELIS
2211 Glenspring Lane
BROOMALL PA 19008
6107332921
christosfelfelis@gmail.com
Accepts EService

HENRY J GILLIN
2149 Mary Lane
BROOMALL PA 19008
hjg844@gmail.com
Accepts EService

RICHARD GIOVANETTI
1 Arbordale Lane
BROOMALL PA 19008
16105475318
richard.giovanetti@g-sa.com
Accepts EService

EILEEN GOLDHORN
196 Cranbourne Drive
BROOMALL PA 19008
mrsgoldee@comcast.net
Accepts EService

DAVID HEAGERTY
2102 Boxwood Drive
BROOMALL PA 19008
484-467-7368
daveheagerty@hotmail.com
Accepts EService

MARIA HENDERSON
1 Madonna Lane
BROOMALL PA 19008
6103599843
mdhcpa@verizon.net
Accepts EService

NICOLE HOWARTH
2508 Selwyn Drive
BROOMALL PA 19008
7174182296
nicolehowarth2@gmail.com
Accepts EService

ROBERT JORDAN
2623 Springfield Road
BROOMALL PA 19008
6103573865
rcjordanjr@gmail.com
Accepts EService

ASH KAILATH
2516 Parke Lane
BROOMALL PA 19008
6104201208
ashokkailath@yahoo.com
Accepts EService

MARY KARAMITOPOULOS
802 Saint Francis Drive
BROOMALL PA 19008
6106566069
kyriamaryk@gmail.com
Accepts EService

Via Email and First Class Mail

SARAH KUCHAN
114 Martins Run MEDIA PA 19063
6108831089
sarahkuchan@gmail.com

WILLIAM LENAHAN
1 Stanfield Ave
BROOMALL PA 19008
7175852916
wrlenahan@gmail.com
Accepts EService

MARILIA MANCINI-STRONG
8 grove lane
BROOMALL PA 19008
6107319022
mariliamstrong@hotmail.com
Accepts EService

ANTHONY MARZIANO JR
237 Talbot Drive
BROOMALL PA 19008
managerptp@aol.com
Accepts EService

ANNA MASCIANTONIO
2739 BRIERWOOD RD
BROOMALL PA 19008-1720
6103534172
anna2739@verizon.net
Accepts EService

MARISSA MCGEEHAN
2102 Boxwood Drive
BROOMALL PA 19008
484-431-7246
marissa.mcgeehan@gmail.com
Accepts EService

NILGUN OKUR
2163 MARY LANE
BROOMALL PA 19008
6103562177
NILGUN.OKUR@GMAIL.COM
Accepts EService

JESSICA PAGLIARA
18 Stanfield ave
BROOMALL PA 19008
javino0524@gmail.com
Accepts EService

MICHAEL PAGLIARA
18 Stanfield ave
BROOMALL PA 19008
610-662-8602
mikepags11@yahoo.com
Accepts EService

KEVIN PICKERING
915 Cedar Grove Road
BROOMALL PA 19008
6106394818
mr.kevinpickering@gmail.com
Accepts EService

ALYSSA PLOTNICK
2203 Graymoor Dr
BROOMALL PA 19008
dollgirl.plotnick27@gmail.com
Accepts EService

LYNNE GARRITY REDDING
ANDREW I REDDING
104 Allison Cir BROOMALL PA 19008
6107166660
lynne.metzler@gmail.com
Accepts EService

MARIA RICH
2691 Old Cedar Grove Rd
BROOMALL PA 19008
Mariarich@verizon.net
Accepts EService

LUISA ROBBINS
411 Langford Road
BROOMALL PA 19008
6105509017
luisa0411@hotmail.com
Accepts EService

LUCINDA SCACE
728 Cedar Grove Rd
BROOMALL PA 19008
cynsca@comcast.net
Accepts EService

KAREN E SPECTOR
403 Briar Drive
BROOMALL PA 19008
6107646224
kspector@yahoo.com
Accepts EService

JEFFREY STRONG
8 grove lane
BROOMALL PA 19008
jeffstrong5150@gmail.com
Accepts EService

PETRA SVENSON
4 Hunters Run
BROOMALL PA 19008
petrasvenson@msn.com
Accepts EService

Via First Class Mail and Email
ALESSIA TRADER
252 Warren Blvd.
Broomall, PA 19008
Trader4MD@gmail.com

THEODORE R UHLMAN
2152 Sproul Rd
BROOMALL PA 19008
484-904-5377
uhlmantr@yahoo.com
Accepts eService

TRACEY WELSH
STEVEN WELSH
2162 Mary Lane
BROOMALL PA 19008
2153601818
twelsh22@hotmail.com
Accepts EService

WILLIAM A WEGENER
22 Stanfield Lane
BROOMALL PA 19008
8622225102
WWEGENER@GMAIL.COM
Accepts EService

BRIDGETT WENDEL
117 ACADEMY LANE
BROOMALL PA 19008
610-353-1450
bridgettwendel@gmail.com
Accepts EService

ANNA WILLIG
640 Cedar Grove Road
BROOMALL PA 19008
610-213-1029
anna413@comcast.net
Accepts EService

NATALIE ZEMAITIS
2651 Old Cedar Grove Rd
BROOMALL PA 19008
2156681035
nattyz@hotmail.com
Accepts EService

KOSMAS YIANTSOS
2228 Windsor Circle
BROOMALL PA 19008
215-588-0630
kyiantsos@hotmail.com
Accepts EService

/s/ Frank L. Tamulonis

Counsel to PECO Energy Company

Dated: April 20, 2021