

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 Norma Blum's Prehearing Memorandum in the above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,  
/s/  
Norma Blum

**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 NORMA BLUM**

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**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 12, 2021 Norma Blum filed a protest to Docket Number P-2021-3024328

1.3 Norma Blum has lived in this neighborhood for more than twenty years.

**2 Issues**

2.1 Location. This facility is located on a tiny, one half acre lot. It is dangerous, it could explode, and it will produce noise and pollution. This facility should not be placed in the middle of a residential neighborhood.

2.2 Safety – In the event of a minor “venting”, perhaps caused by a vehicle crashing through the plastic wall, local Marple first responders will be unable to do anything to

prevent this small leak from ballooning into a larger catastrophe. PECO has not said where the safety valves are located, so a large amount of natural gas could be released before PECO employees can arrive on the scene. An explosion and/or fire will result if the gas comes close to the heaters, the cars that are idling in Freddy'd parking lot, vehicles passing by on the street, or the vehicle that came through the plastic wall.

2.3 Property values – Norma Blum is also concerned that this project will have a negative effect on property values in the neighborhood.

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

**4 Witnesses**

4.1 Norma Blum will be a witness in these proceedings

4.2 Norma Blum reserves the right to call expert witnesses in the future as necessary.

**5 Public Input Hearings** – Norma Blum 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** – Norma Blum 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** – Norma Blum defers to the attorneys for Marple Township and Delaware County.

## **8 Procedural Schedule**

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

## **9 Settlement**

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

Respectfully Submitted,

/ s /

Norma Blum  
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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 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, Norma Blum, 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 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