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April 25, 2021



Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2 nd 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 Ted Uhlman's Letter to Her Honor, Judge DeVoe. Copies of this document have been served in accordance with the attached Certificate of Service.

Thank you for your attention to this matter.

Respectfully Submitted,

Ted Uhlman  
2152 Sproul Rd  
Broomall, PA 19008

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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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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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**TED UHLMAN'S  
AFFIRMATION LETTER, WITH ADDITIONAL COMMENTS**

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Your Honor,

- 1 Ted Uhlman, hereby declares that they do, indeed, wish to continue in this case as a Full Service Party of Record Active Participant.
- 2 Concerning the Public Input Hearings,
  - 2.1 Ted Uhlman respectfully requests that Your Honor consider the following schedule of Public Input Hearings:
    - 2.1.1 Tuesday, May 25 – 10am to Noon and 6pm to 9pm
    - 2.1.2 Thursday, May 27 – 10am to Noon and 6pm to 9pm
    - 2.1.3 Saturday, June 6 – 10am until the last person has spoken
      - 2.1.3.1 Saturday, May 29 is Memorial Day Weekend
  - 2.2 Ted Uhlman respectfully requests that Your Honor consider that, whereas, a large number of residents have filed Protests, and a large number of residents attended the Pre

Hearing Conference, there will probably be a large number of residents who will wish to make their feelings about the proposed project known at the Public Input Hearings.

However, it is also likely that a large portion of said residents, for many reasons, will have little more to input other than their general fears, concerns, and objections, often offering little in the way of new evidence (i.e. “This is the most ridiculous location...”). Therefore, in order to allow each of these residents to register their opinions, Ted Uhlman hereby offers a possible solution to this logistical problem. Ted Uhlman asks Your Honor to consider, (if the regulations allow, and Your Honor wishes), instead of having a large number of people calling in to a Public Input Hearing in a short time and consuming Your Honor’s time and resources, they might be allowed to simply call in (over a period of several days) to a dedicated voicemail at the PUC, assuming that said residents agree to this arrangement, and that Your Honor can consider this testimony with the same weight as would otherwise be the case. It is hoped that such an arrangement would allow for a summary report of the number of calls, and the content of the calls, to be tabulated and entered as evidence.

2.3 Beyond the dates and the “venue” for the Public Input Hearings, Ted Uhlman respectfully requests that, as a Full Service Party of Record Active Participant, they be included in any discussions that may occur, on topics such as, but not limited to, time limits for different kinds of testimony, enforcement of time limits, definition of different kinds of testimony, and method by which residents will be sworn in.

2.4 Regardless of your decisions regarding the Public Input Hearings, Ted Uhlman respectfully requests the release of details as soon as possible.

3 Ted Uhlman respectfully requests that Your Honor clarify the purpose of a site visit. It is believed that Your Honor has stated that a Site Visit would not be a “Meet and Greet”, and would not entail any communication between Your Honor and any of the residents of Marple

Township. If that is the case, Ted Uhlman could not agree more. However, just as viewing maps, photos, and/or video of Hawai'i, is not the same as being there, it seems reasonable that Your honor might consider that viewing maps, photos, and/or video of the corner of Sproul and Cedar Grove Roads in Marple Township is not the same as being there. Ted Uhlman's request for clarification stems from their not understanding, why Your Honor would not be able to simply drive to Marple Township, and view, in person, unannounced, the proposed site and its surroundings.

- 4 Ted Uhlman requests that Your Honor distribute the hosting responsibilities of the Public Input Hearings equally between the three "major" litigants (Delaware County, Marple Township, and PECO). At the Pre Conference Hearing, it was obvious that the teleconferencing capabilities of the PUC would be insufficient for the Public Input Hearings, and Ted Uhlman can attest to the technology and expertise that Marple Township routinely displays in teleconferencing meetings with the public in their Board of Commissioners meetings, their Planning Board Meetings, and, of course at the meetings of the Zoning Hearing Board. Although Ted Uhlman has no experience with telephonic meetings of any Delaware County offices, they would expect that same is true.
- 5 Finally, it must be mentioned, that the events that led to the the development of the Schedule of Litigation, including its acceptance at the Pre Hearing Conference, its transmission 39 minutes prior to the beginning of said Conference, and it's development without any input or consultation from either of the two *pro se* Interveners, or the sixty-plus *pro se* protestants (who, Ted Uhlman believes, at that time, were all considered to be Full Service, Party of Record Active Participants), seem to contradict the orders that Your Honor has promulgated thus far, in that the Interveners and Protesters have been advised, repeatedly, that they are considered very much the same as licensed professional lawyers, As the case continues, Ted Uhlman

respectfully requests that all of the Full Service, Party of Record Active Participants be included in relevant discussions, including settlement. Ted Uhlman wishes to note that, despite the regulations and Your Honor's orders, he has not, to this point, had any direct formal or informal communication FROM counsel for PECO, Marple Township, or Delaware County, other than than through the Full Service List.

Respectfully Submitted,



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Broomall, PA 19008  
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(484) 904-5377

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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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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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**VERIFICATION**

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I, Theodore Robert (Ted) Uhlman, 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,



Ted Uhlman  
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Broomall, PA 19008  
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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 Protest 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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