

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

Re: Docket No. P-2021-3024328

May 5, 2021

Dear Secretary Chiavetta:

Enclosed please find attached

**MOTION REQUESTING THE PRESIDING OFFICER TO
DISMISS AN OBJECTION AND COMPEL THAT
THE INTERROGATORY BE ANSWERED.**

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

**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 Reliability Station in Marple Township, Delaware County Is Reasonably Necessary for the Convenience and Welfare of the Public : : P-2021-3024328
DATED: May 5, 2021

**MOTION REQUESTING THE PRESIDING OFFICER TO
DISMISS AN OBJECTION AND COMPEL THAT
THE INTERROGATORY BE ANSWERED**

Your Honor, in accordance with 52 § 5.342(g), Ted Uhlman hereby respectfully submits a motion requesting the presiding officer to dismiss an objection and compel that the interrogatory be answered.

On Wednesday, April 28, 2021, Ted Uhlman received a set of Discovery Questions from PECO via Stephen C Zumbrum (210428PECO_Discovery01.pdf; attached to this email). Immediately, Ted Uhlman replied to Mr. Zumbrum with an email, advising that Discovery Questions directed to PECO was attached (Discovery21.pdf; attached to this email).

On Wednesday, May 5, at 10:23 PM, Ted Uhlman received PECO's response to the Discovery Questions, (210505PECO_AnswerToDiscovery.pdf; attached to this email).

Ted Uhlman respectfully requests that Your Honor review the aforementioned documents and dismiss PECO's objections, and compel PECO to answer the questions completely. The interrogatories and requests for production of documents are intended to obtain information either directly relevant to the issues under consideration or to lead to the discovery of information that would be admissible in this proceeding before the Public Utility Commission.

If your honor requests a point-by-point repudiation of PECO's response, I will be more than happy to submit such.

Respectfully Submitted,
Ted Uhlman

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing

**MOTION REQUESTING THE PRESIDING OFFICER TO
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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:

CHRISTOPHER A. LEWIS ESQUIRE
FRANK L. TAMULONIS ESQUIRE
STEPHEN C. ZUMBRUN ESQUIRE
BLANK ROME, LLP
ONE LOGAN SQUARE
130 NORTH 18TH STREET
PHILADELPHIA PA 19103
215-569-5793
lewis@blankrome.com
ftamulonis@blankrome.com
szumbrun@blankrome.com
Accepts eService
Representing PECO Energy Company

JACK R. GARFINKLE ESQUIRE
PECO ENERGY COMPANY
2301 MARKET STREET
PO BOX 8699
PHILADELPHIA PA 19101-8699
215.841.6863
jack.garfinkle@exeloncorp.com
Accepts eService

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

ROBERT W. SCOTT ESQUIRE
CARL EWALD
ROBERT W. SCOTT P.C.
205 NORTH MONROE STREET
MEDIA PA 19063
610.891.0108
rscott@robertwscottpc.com
carlewald@gmail.com
Accepts eService
Representing County of Delaware

THEODORE R. UHLMAN
2152 SPROUL RD
BROOMALL PA 19008
484.904.5377
uhlmantr@yahoo.com
Accepts eService

JULIA M. BAKER
2150 SPROUL RD
BROOMALL PA 19008
610.745.8491
jbakeroca@msn.com
Accepts eService



Respectfully Submitted,
Ted Uhlman
2152 Sproul Rd
Broomall, PA 19008
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