

*Via electronic service only due to Emergency Order at M-2020-3019262*

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company for a Finding	:	P-2021-3024328
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	:	

**INTERIM ORDER  
DENYING PROTESTANT UHLMAN’S MOTION TO COMPEL  
PECO TO SUBMIT DISCOVERY RESPONSES**

On April 29, 2021, Theodore Uhlman (Mr. Uhlman or Protestant Uhlman), a protestant and active party in the above-captioned matter filed a certificate of service evidencing his service of Interrogatories and Requests for Documents (Discovery Requests) upon PECO Energy Company (PECO or the Company).

On May 6, 2021, the Company filed a certificate of service evidencing its service of objections and responses to Mr. Uhlman’s Discovery Requests.

On May 7, 2021, Mr. Uhlman filed a Motion Requesting the Presiding Officer to Dismiss an Objection and Compel that the Interrogatory be Answered (Motion to Compel), arguing the information and documents sought were relevant to the proceeding. Mr. Uhlman served the undersigned with a copy of the Motion to Compel by email, attaching a copy of the Discovery Requests he served upon PECO as well as a copy of PECO’s objections and responses.<sup>1</sup>

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<sup>1</sup> Mr. Uhlman’s Discovery Requests and PECO’s objection and responses are not attached to the Motion to Compel Mr. Uhlman filed with the Commission’s Secretary’s Bureau. They were attached as separate documents to the email Mr. Uhlman sent to the undersigned serving her with a copy of the Motion. They are attached to this Order as Attachments A and B, respectively.

On May 12, 2021, the undersigned entered an Interim Order directing PECO to submit its response to the Motion to Compel, if any, by 12:00 noon on Monday, May 17, 2021.

On May 14, 2021, PECO filed its response to the Motion to Compel.

The Motion to Compel is now ripe for ruling.

### Applicable Rules

#### Pa. Code § 5.321. Scope

- (c) *Scope.* Subject to this subchapter, a party may obtain discovery regarding any matter, not privileged, which is relevant to the subject matter involved in the pending action, whether it relates to the claim or defense of the party seeking discovery or to the claim or defense of another party, including the existence, description, nature, content, custody, condition and location of any books, documents, or other tangible things and the identity and location of persons having knowledge of a discoverable matter. It is not ground for objection that the information sought will be inadmissible at hearing if the information sought appears reasonably calculated to lead to the discovery of admissible evidence.

#### Pa. Code § 5.103. Motions

- (a) *Scope and content.* A request may be made by motion for relief desired, except as may be otherwise expressly provided in this chapter and Chapters 1 and 3 (relating to rules of administrative practice and procedure; and special provisions). A motion must set forth the ruling or relief sought, and state the grounds therefor and the statutory or other authority upon which it relies.

### Discussion

The Commission's rules permit discovery between parties in adversarial formal proceedings<sup>2</sup> and provide that a party may obtain discovery regarding any matter, not privileged,

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<sup>2</sup> See 52 Pa.Code § 5.321 *et seq.*

which is relevant to the subject matter involved in the pending action, or any matter which appears reasonably calculated to lead to the discovery of admissible evidence.<sup>3</sup>

Mr. Uhlman served the following Discovery Requests<sup>4</sup> upon PECO<sup>5</sup>:

4. In Paragraph 10, it is stated that, "...PECO plans to utilize an existing Liquefied Natural Gas ("LNG") tank located elsewhere on its system (in West Conshohocken)..."; therefore, I respectfully request that PECO produce general details of the facility in West Conshohocken, including, but not limited to the size of the facility, the size and number of existing LNG storage tanks, and the amount of space within the facility available to construct additional LNG storage facilities.

5. In Paragraph 13, It is stated, "The gas will then be heated, if needed, to preserve gas pressure and then reintroduced to the existing gas main network at an appropriate pressure..."; therefore, I respectfully request that PECO explain, in detail, about why gas that comes into the facility at about 525psi, and leaves the facility at about 99psi needs to be heated in order to preserve gas pressure. As part of your response to this question, it is expected that the explanation will include

- 5.1. Discussion of the Joule-Thomson Cooling Equation, and
- 5.2. Why it is necessary to maintain 525psi pressure in the line, and
- 5.3. The industry practice of "packing and venting" a pipeline.

6. Also in Paragraph 13, it is stated that, "The Reliability Project will reduce or eliminate the need to access the spot market."; therefore, I respectfully request that PECO show evidence how of how the project will reduce or eliminate the need to access the spot market.

PECO objects to all the Discovery Requests on multiple grounds, including relevance. PECO argues, *inter alia*:

The proper scope of inquiry under Section 619 of the Municipalities Planning Code...53 P.S. § 10619, is whether the situation of the buildings

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<sup>3</sup> 52 Pa.Code § 5.321(a).

<sup>4</sup> Mr. Uhlman's Discovery Requests begin with paragraph number 4. Paragraphs 1-3 are instructions.

<sup>5</sup> Mr. Uhlman clarifies in his Discovery Requests that his references to numbered paragraphs refer to PECO's initial filing.

is reasonably necessary for the convenience and welfare of the public and not whether the selected site is absolutely necessary or the best possible site, or whether the service to be provided by the public utility facilities is reasonably necessary for the convenience or welfare of the public.<sup>6</sup> PECO objects to each and every Request to the extent it seeks information that is irrelevant to this proper scope of inquiry and not reasonably calculated to lead to the discovery of admissible evidence that relates to this proper scope of inquiry.<sup>7</sup>

This matter concerns PECO's Petition 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 (Petition). In the Petition, PECO requests that the Commission, pursuant to 52 Pa.Code § 5.41 and Section 619 of the Municipalities Planning Code (MPC), 53 P.S. § 10619, make a finding that: (1) the situation of two buildings at 2090 Sproul Road, Marple Township, Delaware County, Pennsylvania, 19008 (2090 Sproul Road) for a proposed gas reliability station is reasonably necessary for the convenience and welfare of the public and, therefore, exempt from any zoning, subdivision, and land development restriction of the Marple Township Subdivision and Land Development Ordinance and the Marple Township Zoning Code pursuant to MPC § 619, and (2) a proposed security fence appurtenant to the Gas Reliability Station is a "facility" under 66 Pa.C.S. § 102 and is therefore exempt from local zoning requirements.

PECO avers in its application that its current natural gas distribution system in Delaware County is experiencing, or soon will be experiencing, design day constraints. Consequently, PECO plans to utilize an existing Liquefied Natural Gas tank located elsewhere on its system (in West Conshohocken) as a source of supply for Delaware County generally and Marple Township in particular. This larger Natural Gas Reliability Project consists of: (i)

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<sup>6</sup> See *Del-AWARE Unlimited, Inc. v. Pa. Pub. Util. Comm'n*, 513 A.2d 593, 596 (Pa. Commw. Ct. 1986); see *Petition of Sunoco Pipeline, L.P. for A Finding That A Bldg. to Shelter the Walnut Bank Valve Control Station in Wallace Twp., Chester Cty., Pennsylvania Is Reasonably Necessary for the Convenience or Welfare of the Pub.* *Petition of Sunoco Pipeline, L.P. for A Finding That A Bldg. to Shelter the Blairsville Pump Station in Burrell Twp., Indiana Cty., Pennsylvania Is Reasonably Necessary for the Convenience or Welfare of the Pub.*, No. P2014-2411941, 2014 WL 5810345, at \*10.

<sup>7</sup> PECO Energy Company's Objections and Responses to the Interrogatories and Requests for Documents of Petitioner Ted Uhlman Directed to PECO Energy Company, ¶ 2.

upgrading PECO’s natural gas plant in West Conshohocken; (ii) installing 11.5 miles of new gas main; and (iii) constructing the Gas Reliability Station in Marple Township, Delaware County to receive and distribute the natural gas transported by the full Reliability Project. The Petition at issue in the instant matter pertains only to the Gas Reliability Station.

Article VI of the Pennsylvania Municipalities Planning Code (MPC)<sup>8</sup> provides that “[T]he governing body of each municipality . . . , may enact, amend and repeal zoning ordinances to implement comprehensive plans . . . .”<sup>9</sup> Article VI of the MPC does not apply to a proposed building to be used by a public utility corporation if, after notice to the municipality and corporation and public hearing, the Commission decides that **the present or proposed situation of the building in question is reasonably necessary for the convenience or welfare of the public.**<sup>10</sup>

Therefore, a municipality may zone a public utility building unless the Commission determines that the building is reasonably necessary for the convenience or welfare of the public. If the Commission finds that the building is reasonably necessary, the building is exempt from a local zoning ordinance under the MPC.<sup>11</sup> Section 619 of the MPC does not require a utility to prove that the site it has selected is absolutely necessary or that it is the best possible site, it need only show that the building is reasonably necessary.<sup>12</sup> The Commonwealth Court has explained, “We do not interpret [Section 619 of the MPC] as requiring the [Commission] to reevaluate the entire project. [Section 619 of the MPC] merely directs [the Commission] to determine whether the *site* of the [proposed facility] is appropriate to further the public interest.”<sup>13</sup>

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<sup>8</sup> 53 P.S. § 10101 *et seq.*

<sup>9</sup> 53 P.S. § 10601.

<sup>10</sup> *See* 53 P.S. § 10619 (emphasis added).

<sup>11</sup> *Del-AWARE Unlimited, Inc. v. Pa. Pub. Util. Comm’n*, 513 A.2d 593 (Pa. Cmwlth. 1986).

<sup>12</sup> *O’Connor v. Pa. Pub. Util. Comm’n*, 582 A.2d 427 (Pa. Cmwlth. 1990).

<sup>13</sup> *Del-AWARE Unlimited, Inc. v. Pa. Pub. Util. Comm’n*, 513 A.2d 593 (Pa. Cmwlth. 1986) (emphasis in original).

Additionally, the Commission has adopted a final policy statement order intending to further the State's goal of making State agency actions consistent with sound land use planning by considering the impact of its decisions upon local comprehensive plans and zoning ordinances.<sup>14</sup> The policy statement provides that the Commission will consider the impacts of its decisions upon local comprehensive plans and zoning ordinances when reviewing applications for the following:

- (1) Certificates of public convenience.
- (2) Siting electric transmission lines.
- (3) Siting a public utility "building" under section 619 of the Municipalities Planning Code (53 P.S. §10619).
- (4) Other Commission decisions.<sup>15</sup>

Therefore, the issue in this case is whether the siting of the Gas Reliability Station at 2090 Sproul Road is reasonably necessary for the convenience or welfare of the public. In other words, whether it is reasonably necessary for the convenience or welfare of the public that the Gas Reliability Station be sited at 2090 Sproul Road (as opposed to some other location). It is the *siting of the buildings* that is at issue in this matter. In deciding this issue, the Commission will consider the impact of its decision upon local comprehensive plans and zoning ordinances.

In Interrogatory 4, Mr. Uhlman requests "general details of the facility in West Conshohocken, including, but not limited to the size of the facility, the size and number of existing LNG storage tanks, and the amount of space within the facility available to construct additional LNG storage facilities." In Interrogatory 5, Mr. Uhlman requests PECO "explain, in detail, about why gas that comes into the facility at about 525psi, and leaves the facility at about 99psi needs to be heated in order to preserve gas pressure." In Interrogatory 6, Mr. Uhlman requests PECO "provide evidence of how the project will reduce or eliminate the need to access the spot market."

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<sup>14</sup> See 31 Pa. Bull. 951 (February 17, 2001).

<sup>15</sup> 52 Pa.Code § 69.1101.

In response to PECO’S relevance objection, Mr. Uhlman writes only that “[t]he 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.”

The party moving to compel discovery bears the initial burden of proving the relevance of the requested information.<sup>16</sup> Therefore, Mr. Uhlman has the burden of proving that the information sought in his Discovery Requests is relevant or is reasonably calculated to lead to the discovery of admissible evidence. In his Motion to compel, Mr. Uhlman added, “If your honor requests a point-by-point repudiation of PECO’s response, I will be more than happy to submit such.” It is not the undersigned’s role or responsibility, however, to advise adversarial parties how to prepare motions or to request additional information if a motion fails to adequately support the requested relief. The Commission’s rules provide that a motion must set forth the ruling or relief sought, and state the grounds therefor and the statutory or other authority upon which it relies.<sup>17</sup> It is Mr. Uhlman’s responsibility to set forth his argument in full.<sup>18</sup>

The size, capacity, and available space of a facility that is not the subject of PECO’s application and the reasons why gas needs to be heated to preserve gas pressure are not apparently relevant to the issue of whether the siting of the proposed Gas Reliability Station at 2090 Sproul Road is reasonably necessary for the convenience or welfare of the public. Mr. Uhlman’s Motion to Compel with regards to Interrogatory 4 and Interrogatory 5 (including all its subparts) is denied.

With regards to Interrogatory 6, Mr. Uhlman is seeking information supporting PECO’s claim that the larger Reliability Project (of which the proposed Gas Reliability Station at

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<sup>16</sup> *Morrison v. Philadelphia Housing Auth.*, 203 F.R.D. 195, 196 (E.D. Pa. 2001).

<sup>17</sup> 52 Pa.Code § 5.103(a).

<sup>18</sup> At the prehearing conference held on April 21, 2021, at which Mr. Uhlman was in attendance, the undersigned explained, “If you choose to become an active party [in this matter]...you must participate in accordance with the rules of Commission practice appearing in Title 52 of the Pennsylvania Code Chapters 1, 3 and 5 and follow the Commission’s rules of evidence. These rules can be complex, and I will not exempt you from compliance simply because you are not an attorney.”

issue in the instant matter is but one component) will reduce or eliminate the need to access the spot market. It is not readily apparent how the stated goals of the larger project are relevant to the issue of whether it is reasonably necessary for the convenience or welfare of the public that 2090 Sproul Road be selected as the location for the Gas Reliability Station, since theoretically, those goals would be the same even if some other location would have been selected.

In conclusion, Mr. Uhlman bears the burden of proving the information sought by his Discovery Requests is relevant or is reasonably calculated to lead to the discovery of admissible evidence. The undersigned fails to see the link between the information sought by Mr. Uhlman's Discovery Requests and the issue in this matter.

THEREFORE,

IT IS ORDERED:

1. The Motion Requesting the Presiding Officer to Dismiss an Objection and Compel that the Interrogatory be Answered filed by Ted Uhlman on May 7, 2021 is hereby denied.

Date: May 18, 2021

\_\_\_\_\_/s/  
Emily I. DeVoe  
Administrative Law Judge



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 INTERROGATORIES AND REQUESTS FOR DOCUMENTS OF  
PETITIONER TED UHLMAN TO PECO ENERGY COMPANY. 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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## INTERROGATORIES AND DOCUMENT REQUESTS

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In PECO's initial filing of February 26, 2021, PECO makes a number of assertions that have not yet been supported by any supporting evidence.

4 In Paragraph 10, it is stated that, "...PECO plans to utilize an existing Liquefied Natural Gas ("LNG") tank located elsewhere on its system (in West Conshohocken)..."; therefore, I respectfully request that PECO produce general details of the facility in West Conshohocken, including, but not limited to the size of the facility, the size and number of existing LNG storage tanks, and the amount of space within the facility available to construct additional LNG storage facilities.

5 In Paragraph 13, It is stated, "The gas will then be heated, if needed, to preserve gas pressure and then reintroduced to the existing gas main network at an appropriate pressure..."; therefore, I respectfully request that PECO explain, in detail, about why gas that comes into the facility at about 525psi, and leaves the facility at about 99psi needs to be heated in order to preserve gas pressure. As part of your response to this question, it is expected that the explanation will include

- 5.1 Discussion of the Joule-Thomson Cooling Equation<sup>1</sup>, and
- 5.2 Why it is necessary to maintain 525psi pressure in the line, and
- 5.3 The industry practice of "packing and venting" a pipeline<sup>2</sup>.

6 Also n Paragraph 13, it is stated that, "The Reliability Project will reduce or eliminate the need to access the spot market."; therefore, I respectfully request that PECO show evidence how of how the project will reduce or eliminate the need to access the spot market.

Respectfully Submitted,



Ted Uhlman  
2152 Sproul Rd  
Broomall, PA 19008

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1 [https://en.wikipedia.org/wiki/Joule%E2%80%93Thomson\\_effect](https://en.wikipedia.org/wiki/Joule%E2%80%93Thomson_effect) (April 23, 2021)

2 <https://www.equitylifting.com/single-post/2017/10/25/linepack-explained> (April 23, 2021)

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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 Reliability Station in Marple Township, Delaware County Is Reasonably Necessary for the Convenience and Welfare of the Public :  
: Docket No. P-2021-3024328  
:

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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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**COMMONWEALTH OF PENNSYLVANIA  
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 : 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 :

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**PECO ENERGY COMPANY’S OBJECTIONS AND RESPONSES TO THE  
INTERROGATORIES AND REQUESTS FOR DOCUMENTS OF PETITIONER TED  
UHLMAN DIRECTED TO PECO ENERGY COMPANY (SET I)**

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Pursuant to the provisions of 66 Pa. C.S.A § 333 and 52 Pa. Code §§ 5.342, 5.349 and 5.361, Petitioner PECO Energy Company (“PECO”), by its attorneys, submits the following objections and responses to Ted Uhlman’s Interrogatories and Document Requests (collectively, “Requests”) directed to PECO, served on April 28, 2021. PECO expressly reserves the right to supplement, modify, amend, or correct its objections prior to a hearing in this matter.

**GENERAL OBJECTIONS**

1. PECO objects to each and every Request to the extent that it requires an obligation or response beyond that required by the Pennsylvania Public Utility Code or the regulations applicable to matters before the Pennsylvania Public Utility Commission.

2. The proper scope of inquiry under Section 619 of the Municipalities Planning Code (the “MPC”), 53 P.S. § 10619, is whether the situation of the *buildings* is reasonably necessary for

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the convenience and welfare of the public and *not* whether the selected site is absolutely necessary or the best possible site, or whether the service to be provided by the public utility facilities is reasonably necessary for the convenience or welfare of the public.<sup>1</sup> PECO objects to each and every Request to the extent it seeks information that is irrelevant to this proper scope of inquiry and not reasonably calculated to lead to the discovery of admissible evidence that relates to this proper scope of inquiry.

3. PECO objects to each and every Request to the extent it is vague and ambiguous, overly broad, unduly burdensome, oppressive, duplicative or cumulative.

4. PECO objects to each and every Request to the extent it seeks to obtain confidential, proprietary, or highly confidential information concerning PECO's business, business plans, trade secrets, and other sensitive commercial information. PECO is willing to produce such information pursuant to a mutually agreeable protective order and in accordance with the Commission's rules and regulations.

5. PECO objects to each and every Request to the extent it seeks information or documents that are protected by attorney/client privilege, the work product privilege, and/or any other privilege. PECO hereby claims such privileges and applicable protections. Inadvertent disclosure of any such privileged information or documents shall not be deemed to be a waiver of any privilege.

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<sup>1</sup> See *Del-AWARE Unlimited, Inc. v. Pa. Pub. Util. Comm'n*, 513 A.2d 593, 596 (Pa. Commw. Ct. 1986); see *Petition of Sunoco Pipeline, L.P. for A Finding That A Bldg. to Shelter the Walnut Bank Valve Control Station in Wallace Twp., Chester Cty., Pennsylvania Is Reasonably Necessary for the Convenience or Welfare of the Pub.* *Petition of Sunoco Pipeline, L.P. for A Finding That A Bldg. to Shelter the Blairsville Pump Station in Burrell Twp., Indiana Cty., Pennsylvania Is Reasonably Necessary for the Convenience or Welfare of the Pub.* (hereinafter, "SPLP"), No. P-2014-2411941, 2014 WL 5810345, at \*10.

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6. PECO objects to each and every Request to the extent that it requires the making of an unreasonable investigation by PECO.

7. PECO objects to each and every Request to the extent that it seeks publicly available information or information that is equally available to both parties, on the basis that any such request imposes an undue burden on PECO.

8. PECO's responses to each and every Request need be made only after reasonable inquiry into the relevant facts within the time allotted for responding to discovery requests. PECO hereby expressly reserves the right to supplement, modify, amend, or correct its responses and objections as continuing discovery efforts reveal additional information in any hearing or other proceeding in this matter or on appellate review thereof. PECO objects to any interpretation of any Request and/or the instructions in connection therewith that is inconsistent with the foregoing.

9. All of the foregoing General Objections are incorporated by reference in response to each and every Request, regardless of whether or not any additional objections, general or specific, are made in regard to a specific discovery request. A response to a Request shall not be deemed a waiver of any of the foregoing General Objections.

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## INTERROGATORIES AND DOCUMENT REQUESTS

4. <sup>2</sup> In Paragraph 10, it is stated that, “...PECO plans to utilize an existing Liquefied Natural Gas (“LNG”) tank located elsewhere on its system (in West Conshohocken)...”; therefore, I respectfully request that PECO produce general details of the facility in West Conshohocken, including, but not limited to the size of the facility, the size and number of existing LNG storage tanks, and the amount of space within the facility available to construct additional LNG storage facilities.

### **RESPONSE:**

PECO objects to this Request on the grounds that the information sought pertaining to the facility in West Conshohocken is not relevant to the proper scope of inquiry of this proceeding.

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<sup>2</sup> Mr. Uhlman’s Requests are formatted such that paragraphs 1 through 3 are “Definitions and Instructions” and the “Interrogatories and Document Requests” begin with Paragraph 4.

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5. In Paragraph 13, It is stated, “The gas will then be heated, if needed, to preserve gas pressure and then reintroduced to the existing gas main network at an appropriate pressure...”; therefore, I respectfully request that PECO explain, in detail, about why gas that comes into the facility at about 525psi, and leaves the facility at about 99psi needs to be heated in order to preserve gas pressure. As part of your response to this question, it is expected that the explanation will include

- 5.1 Discussion of the Joule-Thomson Cooling Equation [footnote omitted], and
- 5.2 Why it is necessary to maintain 525psi pressure in the line, and
- 5.3 The industry practice of “packing and venting” a pipeline [footnote omitted].

**RESPONSE:**

PECO objects to this Request, and each subpart thereof, on the grounds that the information sought is not relevant to the proper scope of inquiry of this proceeding. Nevertheless, as background information concerning the overall project, PECO refers Mr. Uhlman to PECO’s response to Interrogatory No. 6 in PECO Energy Company’s Objections and Responses to Marple Township and Delaware County’s Joint First Set of Interrogatories Directed to PECO Energy Company, which were served on Mr. Uhlman on May 5, 2021, and which describe how the Gas Reliability Station and other similar gate stations operate.

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6. Also n [sic] Paragraph 13, it is stated that, “The Reliability Project will reduce or eliminate the need to access the spot market.”; therefore, I respectfully request that PECO show evidence how [sic] of how the project will reduce or eliminate the need to access the spot market.

**RESPONSE:**

PECO refers Mr. Uhlman to PECO’s response to Interrogatory No. 1 in PECO Energy Company’s Objections and Responses to Marple Township and Delaware County’s Joint First Set of Interrogatories Directed to PECO Energy Company, which were served on Mr. Uhlman on May 5, 2021.

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*Counsel for PECO Energy Company*

Dated: May 5, 2021

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**CERTIFICATE OF SERVICE**

I hereby certify that on this day I served a true copy of the foregoing Objections and Responses to Ted Uhlman’s Interrogatories and Document Requests 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.

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*/s/ Frank L. Tamulonis*  
\_\_\_\_\_  
Counsel to PECO Energy Company

Dated: May 5, 2021

**P-2021-3024328 - 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.**

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*Revised 4/29/21*

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**P-2021-3024328 - 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**

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