

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

June 17, 2021

Dear Secretary Chiavetta:

Enclosed please find attached

TED UHLMAN'S OBJECTION
TO OBJECTIONS AND MOTION TO STRIKE
BY 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

**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: June, 2021

**TED UHLMAN’S OBJECTION
TO OBJECTIONS AND MOTION TO STRIKE
BY PECO ENERGY COMPANY**

1 On February 26, 2021, PECO Energy Company (“PECO”) filed a Petition for a finding pursuant to 53 P.S. § 10619.

2 PECO’s Petition seeks a finding that 1) the **situation** of two buildings 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 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.

3 In paragraph 11 of PECO’s OBJECTIONS AND MOTION TO STRIKE, “*PECO objects to the admission of Exhibits GF-B and C and any related testimony on the grounds that they are not relevant to this proceeding.*” and further, “*...PECO has submitted direct testimony that establishes*

that the proposed Station is needed to address increasing demands for natural gas in Marple Township and Delaware County.” However, both of those statements are false, and the motion should be denied.

4 However, both of those statements by PECO are false. PECO’s Petition seeks a finding that ... the **situation** of two buildings for a proposed “Gas Reliability Station” is **reasonably necessary** for the convenience and welfare of the public...”, and PECO’s claim of increased use of natural gas, and, more significantly, “the design day firm demand requirements...¹” that is needed to assure that “PECO’s customers will have a reliable source of supply for the coldest conditions in the winter when the gas is needed most...” is central to the assertion that the situation of the buildings is reasonably necessary.

5 The charts in exhibits GF-B and GF-C show that, to the extent that data are known, residential natural gas usage at the state and national level has been flat since 1970, and that any recent increase, as claimed by PECO, is insignificant, and will be replaced in a few years by a decrease, either due to random changes, or due to the increase in domestic natural gas prices as exports to foreign countries increase, the current glut of Marcellus Shale Frack Gas is eliminated, and domestic users compete with the global market for natural gas. These two charts show that natural gas use, and especially, the design day requirement are not increasing, and there is no increase in residential natural gas usage. Instead of attempting to strike these exhibits from the record, PECO needs to produce similar charts that show how and why Delaware County and Marple Township are not in accordance with the trend of flat, or declining residential natural gas usage.

6 Further, PECO’s direct testimony does **not** establish that the Station is needed to address the “increasing demands for natural gas in Marple Township and Delaware County.” If PECO so desired, PECO could simply release similar data and charts for the past 30 years, showing any increase in gas usage with a breakdown for residential, commercial, industrial, and, most importantly, electrical

1 PECO’s Direct Testimony: Carlos Thillet, page 6, lines 17-18

generation customers. Instead, PECO has taken simple matters of historical customer count and historical maximum daily usage, and subjected these simple primary data to analysis that results in Ryan Lewis's "Delaware County Load (CCF per HDD)" that depicts Delaware County historical and projected normalized gas usage from 2011 to the year 2030."² Not to belabor the point, but annual HDD has been decreasing significantly over the past 10 years, which, by itself, will increase the CCF per HDD ratio, but this is just one example of how PECO plays with numbers and analyses them to achieve their business goals.

7 Exhibits exhibits GF-B and GF-C, and related testimony are relevant to the central question in this case, that the **situation** of two buildings for a proposed "Gas Reliability Station" is **reasonably necessary** for the convenience and welfare of the public, and therefore, they need to remain a part of the record.



Respectfully Submitted,
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2152 Sproul Rd
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June 17, 2021

² PECO's Direct Testimony: Ryan Lewis, page 3, lines 5-7, and Exhibit RL-1 and RL-2

CERTIFICATE OF SERVICE

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

**ANSWERS OF TED UHLMAN
TO INTERROGATORIES AND REQUESTS FOR DOCUMENTS
FROM PECO ENERGY COMPANY**

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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