

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.

Re: Docket No. P-2021-3024328

July 15, 2021

Dear Secretary Chiavetta,

Julia Mary (Julie) Baker respectfully requests that the Commission accepts her Motion for Leave to Submit Addition Evidence and Certificate of Service, which was filed to the Docket July 15th.

I am submitting this request via eService on the PUC website and emailing to all parties of record.

Respectfully Submitted,

/s/  
Julia Mary (Julie) Baker

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(610) 745-8491

cc by eService: Honorable Emily I. DeVoe, ALJ  
All Full Service Parties

**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 : Docket No. P-2021-3024328  
Associated with a Gas Reliability Station in Marple Township, :  
Delaware County Is Reasonably Necessary for the Convenience : July 15, 2021  
and Welfare of the Public

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**MOTION BY JULIE BAKER FOR LEAVE TO SUBMIT  
ADDITIONAL EVIDENCE TO THE EVIDENTIARY HEARINGS**

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Julia (Julie) Baker hereby files this Motion for Leave to Submit

Additional Evidence and sets forth as follows:

A. Procedural Background

1. The Evidentiary Hearings in the above referenced matter are currently scheduled and are proceeding on July 15 and 16, 2021, with a possible third day to be scheduled.
2. On July 6, 2021, at approximately 3:30 pm, Julie Baker served and provided a Certificate of Service for a number of Rebuttal Testimonies and Exhibits.
3. Per the April 23, 2021 Pre-Hearing Order, filings served by email must be received by 4:00 p.m. on the due date. In attempting to meet what she believed was a 4 pm deadline, Julie was unable to include all of her Rebuttal exhibits, and even, regrettably, needed to substitute a short published article in lieu of her own testimony (which she had given up her opportunity to testify

at the Public Input Hearings in order to submit to these Evidentiary Hearings), and she was unavailable until almost midnight, whereupon she noticed other submittals had ensued.

4. Early on the afternoon of July 14, 2021, during a flurry of emails among Parties organizing the Witness Matrix, Judge DeVoe asked when were the Parties serving their Cross Examination Testimonies and Exhibits. Julie mistook this, on good faith, to mean that additional evidence was being sought, and so she finished compiling and served her Additional Exhibits in three emails, and filed a Certificate of Service.

5. On July 15, 2021, as the first day of the Evidentiary Hearings began, Dr. Edward Ketyer sent Julie a revised version of his testimony, with apology, because he had still needed to include his citations.

6. On July 15, as Mr. Ted Uhlman was defending his Testimonies and Exhibits against PECO's Motion to Strike, it became apparent that one of his exhibits had not been transmitted successfully, and Judge DeVoe instructed him that he could file a Motion for Leave to Submit Additional Evidence.

7. Julie then asked the Judge if she might also file such a Motion for Dr. Ketyer's revised Testimony (being served to Parties along with this Motion, and Certificate of Service Filed July 15th) and her Additional Exhibits (served to Parties in three emails, and Certificate of Service filed July 14th).

B. These exhibits are relevant to these proceedings:

1. Dr. Ketyer's Testimony has been approved for admission and cross examination, and ALJ DeVoe expressed willingness to review his revised document in its entirety.

2. Julie's photographs of the Brookhaven Station accompany and give visual context to the sound level measurements she conducted with Christine Howze, whose cross examination and study document have been approved for admission into evidence.

3. Julie's submission of Bob D'Orazio's photographs and a Google Map with a distance measurement of the Hershey's Mill Station are germane to the issue of siting, the importance of which has been established on numerous occasions during these proceedings. It was confirmed during the Public Input Hearing that the Station actually preceded the construction of the housing development, and so it demonstrates that planners and developers refrained purposefully from building residences closer than approximately 270 feet from the existing station (and that it has only two stacks).

4. The inclusion of public documents documenting pipeline buffers, Updated Report of High Consequence Areas (etc.), and manuals from the AGA and NARUC serve to illustrate best practices in the planning and development of natural gas pressure regulation facilities with respect to positive community engagement as well as public safety and welfare. I hope to refer to

them during cross examinations yet to occur. I do now realize that the SDS for natural gas has already been attached to Mr. Capuzzi's testimony, so admittedly that is a redundant submission.

5. The additional exhibits are not repetitive, will not cause delay, and will not result in any prejudice towards the Appellants, not do they reflect an error other than my own.

WHEREFORE, Ms. Baker respectfully request that ALJ DeVoe:

1. Grant this Motion;
2. Allow Leave for her Additional Evidence for these Evidentiary Hearings.

Respectfully Submitted,

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/s/

Julia M. Baker, *pro se*

Dated: July 15, 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 Reliability Station in Marple Township, Delaware County Is Reasonably Necessary for the Convenience and Welfare of the Public : : Docket No. P-2021-3024328 : : July 14, 2021

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**CERTIFICATE OF SERVICE**

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I hereby certify that I have, on July 14 as ordered, served true and correct copies of four emails constituting eight Evidentiary Hearing Cross Examination Exhibits upon all of the Active parties, in accordance with the requirements of 52 PA Code § 1.54 (relating to service by participants) via eService upon the parties listed below:

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CHRISTOPHER A. LEWIS ESQUIRE  
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Respectfully Submitted,

/s/\_\_\_\_\_

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