

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  
Date: June 20, 2023

Dear Secretary Chiavetta:

Enclosed please find attached Certificate of Service for

**Marilia Mancini Strong's Protest**

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,

Marilia Mancini-Strong

8 Grove Lane  
Broomall, PA 19008  
June 20, 2023

**BEFORE THE COMMONWEALTH OF PENNSYLVANIA  
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 : Docket No. P-2021-3024328  
Township, Delaware County Is Reasonably Necessary for the  
Convenience and Welfare of the Public :

**MARILIA MANCINI-STRONG’S PROTEST (OFFICIAL)**

Pursuant to 52 Pa. Code § 5.222 and in accordance with the Prehearing Conference Order dated June 5, 2023, Marilia Mancini-Strong respectfully submits the following Protest.

On December 7, the Initial Decision was published, and, although the PUC decided in PECO's favor, the Initial Decision included the following statement:

*While we find that the **concerns** raised by the municipalities and the individual intervenors **are valid**, and **we are not unsympathetic** to those concerns, issues related to noise, gas emissions, aesthetics, traffic and other health and safety concerns are **beyond the Commission’s review**.*

On March 19, a seven member panel of PA Commonwealth Court judges unanimously decided that the PUC had erred in its decision, and remanded the case back to the PUC, with the following instructions:

*...that it issue an Amended Decision regarding Intervenor PECO Energy Company’s “Petition... . . . For a Finding Pursuant to 53 P.S. § 10619,” **which must incorporate the results of a constitutionally sound environmental impact review...** ”*

Therefore, following the order of the Commonwealth Court, the main issues in the case at this point are concerned with Who, What, When, Where, Why, and How the Environmental Impact Review will be completed.

- WHO – The PUC lacks the expertise to consider the environmental impacts of a Gas Expansion Plant; therefore, an independent third party must be tasked with the review
  
- WHAT – the review must include (but not be limited to) issues of **noise, gas emissions, aesthetics, traffic and other health and safety concerns.**

- WHEN – The review should be completed in a timely manner; however, speed is not a priority, and the thoroughness of the review must not be compromised by a desire for a hasty decision.
- WHERE – The review must not be limited to PECO’s theoretical estimates. The review needs to compare and evaluate real data from similar facilities both within and beyond the PECO service area. Projections about future noise, vibration, gas emissions, aesthetics, traffic and other health and safety concerns need to be based on real equipment operating in the same environment as the Gas Expansion Plant proposed for the Corner of Sproul and Cedar Grove Roads.
- WHY – The purpose of this environmental review is to ensure that, IF the Gas Expansion Plant proposed for the Corner of Sproul and Cedar Grove Roads is, in fact, ever built, that it will have negligible deleterious effects on the noise, gas emissions, aesthetics, traffic and other health and safety concerns that have been identified by Marple Township, the residents of Marple Township, the ALJ, the Commonwealth Court, and just about everybody except PECO.

Respectfully Submitted,  
Marilia Mancini-Strong  
8 Grove Lane  
Broomall, PA 19008  
June 20, 2023

**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.**

*FULL-SERVICE LIST:*

*Revised 4/29/21*

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*Revised 4/29/21*

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