BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Letter of Notification of PECO Energy Company	:	
Filed Pursuant to 52 Pa. Code §§ 57.71 et seq.	:	
for Approval of the Siting and Construction of	:	**Docket No. A-2025-3054731**
the Siting and Construction of the 220-09 Line Tap	:	
Project Located in East Whiteland Township,	:	**Docket No. P -2026-3064335**
Chester County, Pennsylvania	:	

PETITION FOR RECONSIDERATION AND TO SUPPLEMENT THE RECORD

Julianna Ferris ("Petitioner"), *pro se*, petitions under 66 Pa.C.S. § 703(g) and 52 Pa. Code § 5.572 for reconsideration of the Commission's Order entered October 1, 2026 (the "October 1 Order"), and for leave to supplement the record with the documents identified below. In support, Petitioner states:

PRELIMINARY STATEMENT

1. The October 1 Order called Petitioner's objections "bald," "conclusory," and "speculative" while repeating PECO's own statements as findings. The Commission answered with adjectives. Petitioner answered with evidence. Four findings. One source: PECO. No hearing. No cross-examination. No independent proof.

2. The Commission found that PECO "does not currently have an easement for Customer's property," adopted that statement as a finding, called Petitioner's contrary evidence "bald" and "conclusory," and closed the docket. October 1 Order at 10, 12. The Customer's own documents say the opposite. Its site plan shows a "PECO CLEARING EASEMENT." Its environmental consultant records PECO easements on a Superfund site. Its engineer lists five. Exs. A–C. The Commission saw none of it, and instead adopted PECO's limited representation that no

new easement had been negotiated as a finding that PECO held no easement on the Customer Property, without examining the existing easements documented in the Customer's own records.

3. The contradictions now extend to the very danger Petitioner sought to prevent. PECO has attached high-voltage conductors to a steel monopole on the Customer Property for which the Township has identified no construction permit, and for which no engineering certification, inspection records, or other documentation establishing compliance with applicable safety standards has been produced. (Exs. J, L, M). Yet PECO vigorously opposed Petitioner's request to prevent energization pending verification. PECO was prepared to proceed with energization without first establishing on the record that the structure supporting its high-voltage conductors was properly authorized, inspected, and safe. This is precisely the failure of due diligence and disregard for public safety that Petitioner has repeatedly brought to the Commission's attention. Petitioner requests verification of the actual energization status, not acceptance of another assurance.

4. The boundary itself was not visibly marked. Exhibit E shows an irregular property line between PECO's Planebrook Substation and the adjoining Customer Property, while Exhibit D shows that, as of April 27, 2026, no visible fence, wall, or boundary markers separated the adjoining work areas. A paved access road and continuous graded ground connected the areas where the newly erected structures stood. Yet PECO represented that all its construction remained on its own property. The Commission accepted that representation without requiring a survey or evidence identifying how PECO established and maintained the property boundary during construction. On a site adjoining Superfund property, that omission warrants examination.

5. Petitioner also previously documented PECO's September 25, 2025, demand for expedited PJM clearance. The Customer's newly obtained attorney invoices now reveal

contemporaneous discussions of "power issues," trial testimony, and preparation of a subpoena to PECO's K. McCourt on the same dates PECO was under a "time crunch" to get sign off on of PJM's modeling. Ex. G. It gives the Commission a specific question to ask; was PECO rushing because its own Customer was threatening or contemplating legal action over PECO's earlier commitments?

6. The Commission should reopen the docket, receive the Customer's documents, and set the contested facts for hearing. PECO's own verification says its signatory "expect[s] to be able to prove the same at a hearing held in this matter." PECO Aug. 24 Answer, Verification. Petitioner accepts the invitation: under oath, with production of the instruments, and with cross-examination.

PROCEDURAL CHRONOLOGY AND DOCUMENTARY RECORD

7. Petitioner sought emergency relief from the Commission for public health safety while the record was contested. The Commission decided on PECO's filing and left the separate rescission proceeding unresolved.

Date	Filing/Event	Status
Apr. 14, 2025	PECO files 220-09 LON	Approved Oct. 9, 2025
July 15, 2026	Rescission Petition attached to docket	Pending; no ruling identified
Aug. 3, 2026	PECO Answer to Rescission Petition	Attached to docket
Aug. 4, 2026	Petition for Interim Emergency Order; Motion for Leave to Reply; Reply	Attached to docket
Aug. 10, 2026	JHJ Childcare Petition to Intervene	No Commission ruling identified
Aug. 11, 2026	Secretarial Letter concerning emergency relief	Issued
Aug. 14, 2026	Petition for Reconsideration of emergency denial	Attached to docket
Aug. 21, 2026	PECO Answer to Motion for Leave to Reply	No Commission ruling identified

Aug. 27, 2026	PECO Answer to Reconsideration Petition	Published on docket
Aug. 27, 2026	Short Form Order on reconsideration	Issued
Sept. 10, 2026	PECO Answer to JHJ Childcare intervention petition	Attached to docket
Oct. 1, 2026	Order denying reconsideration	Orders “this Docket” closed
Oct. 7, 2026	Petitioner learns of October 1 Order	Petitioner states no service received

8. Petitioner requests admission of the following exhibits, together with the PJM correspondence already attached to PECO’s August 24 Answer. These documents are not anonymous allegations. Several were prepared by the Customer or its professionals. Documents were recently obtained through Right to Know requests.

Ex.	**Document**	**Relevance**
A	Customer township presentation, Feb. 25, 2026	“Red = Existing Easements”; “PECO CLEARING EASEMENT”
B	EcolSciences Soils Management Plan	Four PECO/Philadelphia Electric easements on the site
C	JMR engineering report, Nov. 10, 2023	Five electric right-of-way easements
D	Apr. 27, 2026 drone still of monopole structure fully built	Monopole and PECO substation property with fulyl erected structures and no
E	Customer parcel documentation	Foote Mineral site parcels 42-3-130, 42-3-130.1, 42-3-130.2 and PECO parcels
F	Abel Brothers invoice, Oct. 29, 2023	Green Fig skid steer recovered at PECO Planebrook substation
G	Customer counsel billing, Sept. 2025	PECO power issues and subpoena preparation
H	Customer project website	Developer-funded off-site 230 kV upgrades; shared lot line

I	Lyddane testimony, pp. 37-38	Planned bulk construction-truck route through PECO property
J	East Whiteland Township Permit Grid	Grid of permit application by the Customer and subsequent approvals
K	Screenshot of Charles Lyddane, Managing Partner of Green Fig (Customer) LinkedIn	Customer advertising electrical work
L	Screenshot Email from Township Manager	No monopole permit and investigating its UCC conformity
M	Still images from drone August 20, 2026 of monopole	Unpermitted monopole structure with high voltage lines connected by PECO
N	Still images from drone August 20, 2026 of gate	Images show chain linked double gate for access between PECO and Customer property

ARGUMENT

I. THE COMMISSION CALLED PETITIONER'S EVIDENCE "BALD" AND PECO'S SAY-SO "ESTABLISHED."

9. **Assertions are not evidence.** Evidence establishes. A recorded instrument establishes. A witness who can be cross-examined establishes. A party's own Answer, vouched for by its own officer, never tested at a hearing, and never answered by the opposing party because the Commission would not rule on her motion to reply, establishes nothing. It is an assertion, and it is the only one in this record that the Commission treated as proof. The Commission called Petitioner's contradictions "bald" and PECO's assertions "established." The difference between them is who made them.

10. **The easements exist in the Customer records.** The Customer's February 25, 2026 municipal presentation labels an existing, red-shaded area "PECO CLEARING EASEMENT." Ex. A, slide 5. The Customer's consultant identifies two Pennsylvania Electric Company easements

and two Philadelphia Electric Company easements on the Superfund site. Ex. B at 2. The Customer's November 10, 2023 engineer report lists two 35-foot PECO rights-of-way, two 40-foot PECO rights-of-way, and one 50-foot Philadelphia Electric right-of-way. Ex. C at 1. These records need not describe the same instruments to contradict the Commission's unqualified finding that PECO does not currently have an easement for the Customer Property. October 1 Order at 12.

11. **No new easements does not mean no existing easement.** PECO's filings raise a material question the Commission failed to examine: Did PECO ultimately determine that no new easement was necessary because it already possessed easement rights on the Customer Property?

12. **PECO vs. PECO.** In its April 14, 2025 Letter of Notification ("LON"), PECO disclosed that approximately 220 feet of the proposed 230 kV line would extend onto the Customer Property, stated that it was "negotiating necessary land rights," and represented that it would maintain vegetation within the right-of-way after energization. LON ¶¶ 12, 18; Att. 2, Q7. In July 2026, PECO asserted that all of its construction was located on PECO property. In August, PECO stated that it would obtain a right-of-way on the Customer Property. Yet on August 24, PECO represented that the easement originally contemplated had not proven necessary and that no such new easement had been negotiated. Meanwhile, the Customer's own documents identify multiple preexisting PECO easements, including a specifically designated "PECO CLEARING EASEMENT." Exhibits A–C. The absence of a newly negotiated easement does not establish the absence of existing easement rights. The Commission accepted PECO's latest representation without requiring PECO to identify the existing easements, explain whether it intends to rely upon them, or reconcile its changing descriptions of the land rights necessary to construct, operate, access, and maintain the proposed facilities.

Date	PECO statement	Source

Apr. 14, 2025	220 feet of 230-kV line on Customer Property	LON ¶ 12
Apr. 14, 2025	is negotiating necessary land rights with the new customer	LON Att. 2, Q7
Apr. 14, 2025	PECO will manage right-of-way vegetation once the line is in service	LON ¶ 18
July 2026	[A]ll of PECO's construction is located on PECO's property	Answer to Rescission Petition, Att. B at 8
Aug. 4, 2026	PECO "will also obtain a right-of-way on the customer's property"	PECO Answer at 4
Aug. 24, 2026	No new easement has been negotiated	PECO Answer at 8-9

13. **The Order depends on the premise.** The Order holds that the Comfort Letters impose no obligation on PECO because, "to date, an easement has not been necessary, and no such easement has been negotiated." October 1 Order at 10. It accepts that PECO's work is "located within existing property owned by PECO and the new right-of-way owned by the Customer," and that PECO caused no "earth disturbance of the Customer's property." *Id.* at 12. If PECO holds existing easements on the Customer Property, as three Customer records indicate, the Commission's factual premise is contradicted, and its conclusion that PECO stands outside the Comfort Letters, the Environmental Covenant, and the Soil Management Plan requires reconsideration in light of the actual easement instruments and their terms.

14. **Missing evidence.** Findings of fact must rest on substantial evidence. 2 Pa.C.S. § 704. An untested, interested-party assertion is not a substitute for substantial evidence. The Commission accepted PECO's representations without ruling on Petitioner's pending motion for leave to reply or providing an evidentiary hearing at which those representations could be

challenged. See Petitioner's Motion for Leave to Reply and Reply, filed July 29, 2026 (docketed Aug. 4, 2026); October 1 Order at 8–12. The Commission may not take a utility at its word, refuse to hear the other side, and then fault the other side for lacking proof especially when the scope of work documented contradicts the present statements by PECO, and PECO cannot explain how it intends to manage the high voltage lines without it. Reconsideration exists for this: "considerations which appear to have been overlooked or not addressed by the Commission." *Duick*, 56 Pa. P.U.C. at 558-59.

15. **The missing hearing.** PECO's verification promises proof "at a hearing held in this matter." PECO Aug. 24 Answer, Verification. Petitioner has asked for a hearing since August 13. The Commission refused by treating her petition as one for *ex parte* relief. October 1 Order at 8-9. A utility that swears to a fact the other side's own records contradict should have to prove it on a witness stand, not behind a verification page.

II. PECO ENDANGERS PUBLIC SAFETY WITH HIGH-VOLTAGE LINES ON A MONOPOLE LACKING VERIFIED PERMITS AND CODE COMPLIANCE

16. **The mystery steel pole.** PECO has attached high-voltage conductors to a one-hundred-forty-foot (140-foot) steel monopole, fully erected by April 27, 2026, for which the Customer's property Township has identified no approved construction permit, no responsible builder, and no engineering or inspection records establishing code compliance. (Exs. J, L, M). PECO opposed delaying energization despite the absence of documented proof that the structure is safe to support its high-voltage facilities. This is not a minor paperwork deficiency. It is an unresolved public safety risk involving a massive, potentially energized structure whose construction and structural integrity have not been independently verified. The Commission should

direct PECO to remove the high voltage lines presently connected to this structure given the pole's unknown status.

17. **PECO's electrical decisions compromise public safety**. Petitioner has repeatedly asked the Commission to scrutinize PECO's safety due diligence before permitting energization. Despite the unresolved questions concerning the monopole's construction, permitting, and structural compliance, PECO opposed the requested delay, and the Commission denied emergency relief without requiring production of the underlying safety records. See PECO's Answer opposing Petitioner's Petition for Interim Emergency Order, filed August 2026; Commission Order dated August 11, 2026, Docket No. A-2025-3054731. The public should not bear the risk while those questions remain unanswered, especially since the Customer continues to advertise publicly the electrical work on public social media despite the Township having or approving any permits for the pole and electrical work. (Exs. J, K).

18. **Petitioner's evidence.** Reconsideration is warranted where a petition raises "new and novel arguments, not previously heard, or considerations which appear to have been overlooked or not addressed by the Commission." Duick v. Pennsylvania Gas and Water Co., 56 Pa. P.U.C. 553, 558–59 (1982), quoted in the October 1 Order at 4. Newly obtained evidence bearing directly on an unresolved public safety concern warrants reconsideration. Petitioner has obtained numerous Right-to-Know requests seeking records concerning the steel monopole. To date, the Township has not identified the entity responsible for constructing the structure or produced documentation establishing its compliance with applicable construction and safety requirements. PECO, which maintains that it did not construct the monopole, nevertheless attached high-voltage conductors to it and argued before this Commission against relief that would have prevented PECO from energizing those conductors pending safety verification. PECO should be

required to identify who erected the structure, when it was constructed, what engineering and inspection records establish its safety, and the basis upon which PECO determined that a structure it claims not to have built was suitable for connection to its high-voltage system. If PECO cannot identify who constructed the monopole or produce the engineering and inspection records upon which it relied before attaching high-voltage conductors, the Commission has no verified basis in this record to conclude that the structure is safe for connection let alone energization. Those unanswered questions demand an evidentiary hearing, not another assurance.

III. PETITIONER PROVED THE RUSH. THE CUSTOMER'S SUBPOENA RECORDS NOW RAISE THE QUESTION OF WHY

19. **PECO admitted the time crunch.** Petitioner's August 11th, 2026, Petition for Reconsideration for the Denial of Emergency Relief documented PECO's pressure to expedite PJM's load-study results for Commission approval. Newly obtained evidence now raises a further question: whether pressure from the Customer concerning electric-service commitments contributed to PECO's admitted "time crunch" in seeking PJM results for Commission approval. The contemporaneous records warrant examination, not dismissal as speculation. The Commission should be clear about the source of the "time crunch." Petitioner did not invent the phrase, infer urgency, or speculate about PECO's motives. PECO itself admitted the "time crunch" in writing, in a document PECO placed on the Commission's own docket. The evidence is not Petitioner's characterization. It is PECO's own words, preserved in the Commission's record.

20. **Legal action.** The Customer's own lawyers were preparing to compel PECO's testimony. Exhibit G, legal billing records obtained through a Pennsylvania Department of Community and Economic Development (DCED) Right-to-Know request for Customer, records a September 23, 2025, conference with K. McCourt of PECO concerning "power issues" and "testimony at trial," and a meeting with PECO concerning electricity availability. On September

24, 2025, the Customer's counsel prepared a subpoena for McCourt and addressed a strategy to subpoena PECO testimony. These were not Petitioner's lawyers. They were the Customer's. They were pursuing testimony from the utility that had already committed to supply the developer's project.

21. **The dates converge**. The dates are the evidence. On September 24, 2025, the same day the Customer's lawyers were preparing compulsory testimony from PECO, PJM's responds to PECO's inquiry from September 23rd about the model result and clarified the results of the overloads identified in its model of the 290 MW configuration. PJM indicated that Phase 1 at 150 MW could proceed but Phase 2 had not passed the do-no-harm analysis. On September 24, PECO urged PJM to issue the Phase 1 supplemental identification immediately, explaining that it was in a "time crunch" to provide results to the PUC for permitting. PECO's September 30 affidavit acknowledged that Phase 2 had not passed. The Commission approved the LON on October 9, 2025. The Customer's efforts to compel PECO testimony and PECO's admitted "time crunch" occurred during the same critical period. The question requiring examination is whether actual or threatened legal action concerning PECO's electric-service commitments created that urgency and, if so, whether it influenced PECO's decision to seek approval through the LON procedure rather than the traditional approval process, the timing of its application, or the information presented to the Commission. Ex. G; PECO Aug. 24, 2026 Answer, Davis Affidavit and attached PJM correspondence.

22. **Phase 2 was not imaginary.** The October 1 Order characterizes Petitioner's concerns about future phases as "entirely speculative." October 1 Order at 12. Yet PECO's own September 30, 2025 affidavit acknowledged that PJM separately evaluated a 290 MW Phase 2 configuration and determined that it had not passed the do-no-harm analysis at that time. Davis

Aff. ¶¶ 4–6, attached to PECO's August 24 Answer. The LON also expressly contemplated future upgrades requiring separate approval. LON ¶ 11. Whether those upgrades would proceed remained uncertain; the existence of the Phase 2 proposal and its unresolved PJM violations did not. The Commission should not dismiss documented facts as speculation. Petitioner previously submitted evidence from the Customer's website advertising 300 MW of capacity, achievable only through Phase 2, in her August 2026 Petition for Reconsideration. Petitioner now provides additional evidence from another Customer website (Ex. H), which expressly identifies "290 megawatts" in response to the FAQ, "How much electricity will the facility use?" These are the Customer's own published representations, not speculation by Petitioner.

IV. PECO'S CLAIM THAT ITS CONSTRUCTION REMAINED WITHIN ITS PROPERTY BOUNDARIES IS UNSUPPORTED AND UNSUPPORTABLE.

23. **An invisible boundary**. As shown in Exhibit D, on April 27, 2026, drone footage of the site recorded the new monopole structures standing on and beside PECO's Planebrook property. The photographic evidence shows no markers, no fence, nothing that indicates Customer Property to PECO's property. Beyond it, the photograph shows no fence, wall, or marker of any kind separating the substation's yard. A paved road and a continuous graded surface run between them. PECO has told the Commission that "all of PECO's construction is located on PECO's property," that clearing was "not by PECO," and that no easement was needed. Ex. D shows the ground on which those statements depend: one continuous work area, with nothing to tell a crew, an inspector, or the Commission where any property line runs. Whatever line PECO draws on paper, it is not drawn on the land.

24. **The monopole was built before any permit was issued.** By April 27, 2026, a 140-foot steel monopole was already standing on the Customer Property as documented in Exhibit D.

Yet the Township's permit records show that, as of that date, the only permit issued for the Customer's project was a March 17, 2026, permit for a temporary construction office trailer. (Ex. J). The temporary security fence permit was not issued until May 22, the permit for micropiles, footings, concrete pads, fencing, and a control house until June 11. Notably, the 140-foot monopole on the Customer Property appeared alongside PECO's newly constructed monopoles during the same period, despite the absence of an identified construction permit for the Customer's structure. How does PECO explain this contemporaneous construction, what did PECO know about who was erecting the Customer's monopole, and what coordination, if any, occurred between PECO and the Customer concerning its construction?

25. **The line itself is not a line.** Exhibit E is a parcel map of the PECO and Customer Property. The red outline is the property boundary for PECO. The southern boundary for Customer property (UPINs 42-3-130.1 and 42-3-130.2) and PECO's Planebrook substation (UPIN (42-6-1) northern boundary are contiguous; directly adjoining parcels sharing a common property boundary. Most importantly, the property line is not straight. It angles, steps, and jogs, and where it passes the substation at the bottom of the map it bends around it. No fence, wall, or marker follows it, as Exhibit D shows. The irregular boundary shown in Exhibit E was not visibly marked on the ground in Exhibit D's April 27, 2026 photograph, raising the question of how PECO verified that its construction remained entirely within its own property. PECO asks the Commission to accept that its work stayed on one side of a line that no one can see.

26. **Customer's own records show access through PECO.** Exhibit F is an invoice dated October 29, 2023, from Abel Brothers Towing & Auto to Customer, paid by check on November 7, 2023. It bills for winching a skid steer "from mud at PECO Plainbrook substation; Rt30, Exton," and transporting it to another PECO substation. Exhibit I is a separate testimony

from Charles Lyddane, Managing Partner of the Customer entity, at a public hearing held by the East Whiteland Township Zoning Hearing Board to consider the application of Green Fig Land, LLC, appeal 2021-11 on Monday, October 25, 2021, documents his response to an inquiry about traffic volume that involved the PECO property. He states, under legal testimony, that:

> "we're going to bring the construction traffic in from off of Route 30 and 202 – and the 202 interchange there. There's a road coming back into the back of our property through PECO there. So that's – that's where we're going to being the bulks of traffic in and out in the trucks."

A still drone image from August 20, 2026, show a chain linked double gate between the Customer proper and PECO's property. (Ex. N). PECO's representations to the Commission cannot be reconciled with the evidence on the ground. The Customer's sworn testimony, documented presence of its equipment at PECO's substation, adjoining parcel boundaries, and the double chain-link access gate establish a connection between these properties that PECO's representations leave unexplained. PECO cannot ask the Commission to accept its assertions as established fact while the Customer's own records and physical evidence tell a different story. The Commission should demand an explanation under oath, not another untested assurance.

V. THE COMMISSION MUST GRANT EMERGENCY RELIEF, HALT FURTHER WORK, AND REQUIRE AN EVIDENTIARY HEARING

27. The Commission should grant Petitioner's pending request for emergency relief and order PECO to cease all further construction, electrical work, connection activities, and energization associated with the 220-09 Line Tap Project pending an evidentiary hearing and verification of the disputed property rights, construction permits, and safety compliance. PECO has attached high-voltage conductors to a 140-foot monopole on the Customer Property without producing documentation establishing who constructed it, whether it was properly permitted and

inspected, or whether it is structurally suitable for that purpose. The Commission should not permit additional work or energization to proceed while these material questions remain unresolved. Exhibits A through N should be admitted into the record of both dockets so that the Commission can evaluate the evidence rather than continue to rely solely on PECO's untested representations.

28. PECO should be required to produce, under verification, every easement, license, right-of-way, access, or other land-rights instrument between PECO or its affiliates and the Customer or any owner of the Customer Property, with recording information, and to identify who performed vegetation clearing within the right-of-way and under what authority.

29. Petitioner reserves all rights, including review in the Commonwealth Court, and incorporates each of her prior filings in both dockets. Nothing in this Petition waives any argument made in them.

RELIEF REQUESTED

Petitioner respectfully requests that the Commission:

(a) Grant Petitioner's request for emergency relief and direct PECO to immediately cease all further construction, electrical work, connection activities, and energization associated with the 220-09 Line Tap Project pending an evidentiary hearing and verification of the disputed property rights, permits, and safety compliance; direct PECO to disconnect the high-voltage conductors presently attached to the Customer's 140-foot monopole; and prohibit reconnection or energization until further order of the Commission and grant reconsideration and vacate paragraph 2 of the October 1 Order or, at a minimum, clarify that it does not close Docket No. A-2025-3054731;

(b) Vacate the findings at pages 10 and 12 of the October 1 Order that "PECO established" it has no easement, that the Comfort Letters and Soil Management Plan impose no obligations on PECO, and that its line is confined to PECO property, none of which any evidence has established;

(c) Direct PECO to file a boundary survey locating every pole, structure, and laydown area of the Project relative to the PECO property line and the Superfund parcel boundaries, and to identify the owner of, and the permit or authority for, the monopole on the Superfund site (Exhibit D);

(d) Direct PECO to produce, under verification, its communications with the Customer and its counsel concerning power availability, the subpoena to K. McCourt and any testimony given, and to identify the proceeding in which that testimony was sought;

(e) Require PECO to answer under verification whether threatened, contemplated, pending, or filed Customer litigation or other legal pressure concerning PECO's electric-service commitments affected PECO's PJM communications, its selection of the LON procedure, the timing of the approval request, or the completeness of its disclosures; identify any proceeding and produce responsive nonprivileged communications, with a privilege log for withheld documents;

(f) Receive Exhibits A, B, C, D, E, F, G, H, I, J, K, L, M, and N into the record of Docket Nos. A-2025-3054731 and P-2026-3064335;

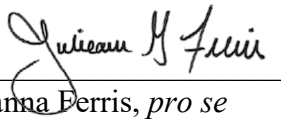
(g) Rule on the Rescission Petition, the Motion for Leave to Reply, and the Petition to Intervene filed by JHJ Childcare Inc, and permit Petitioner to respond to PECO's August 24, 2026, Answer;

(h) Set for evidentiary hearing the location, grantor, date, and scope of each PECO easement on the Customer Property, including the "PECO CLEARING EASEMENT" identified in Exhibit A; the ownership and purpose of the control houses; and the status of Phase 2;

(i) Direct PECO to file, under verification and within a time the Commission sets, the land-rights instruments and identification of vegetation-clearing responsibility requested in paragraph 28 above;

(j) Grant such other relief as the Commission deems just and proper.

Respectfully submitted,



Julianna Ferris, *pro se*
28 Mountain Laurel Lane
Malvern, PA 19355

Dated: October 16, 2026

BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Letter of Notification of PECO Energy Company	:	
Filed Pursuant to 52 Pa. Code §§ 57.71 et seq.	:	
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Project Located in East Whiteland Township,	:	**Docket No. P -2026-3064335**
Chester County, Pennsylvania	:	

VERIFICATION

I, Julianna Ferris, state that the facts set forth in the foregoing Petition for Reconsideration and to Supplement the Record are true and correct to the best of my knowledge, information and belief. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.

Julianna Ferris
Dated: October 16, 2026

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Chester County, Pennsylvania	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing Petition for Reconsideration and to Supplement the Record upon the persons listed below, in accordance with 52 Pa. Code §§ 1.54, 5.41(b) and 5.572(b):

VIA ELECTRONIC MAIL

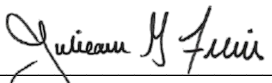
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stepwilson@pa.gov



Julianna Ferris
Dated: October 16, 2026

EXHIBIT A

Screenshot Customer presentation to the East Whiteland Township Planning Commission, February 25, 2026, slide 5, "Existing Buffers / Easements." Image highlighted from recorded plans with the Recorder of Deeds.

Existing Buffers / Easements

- **Green** = Existing Buffer
- **Red** = Existing Easements

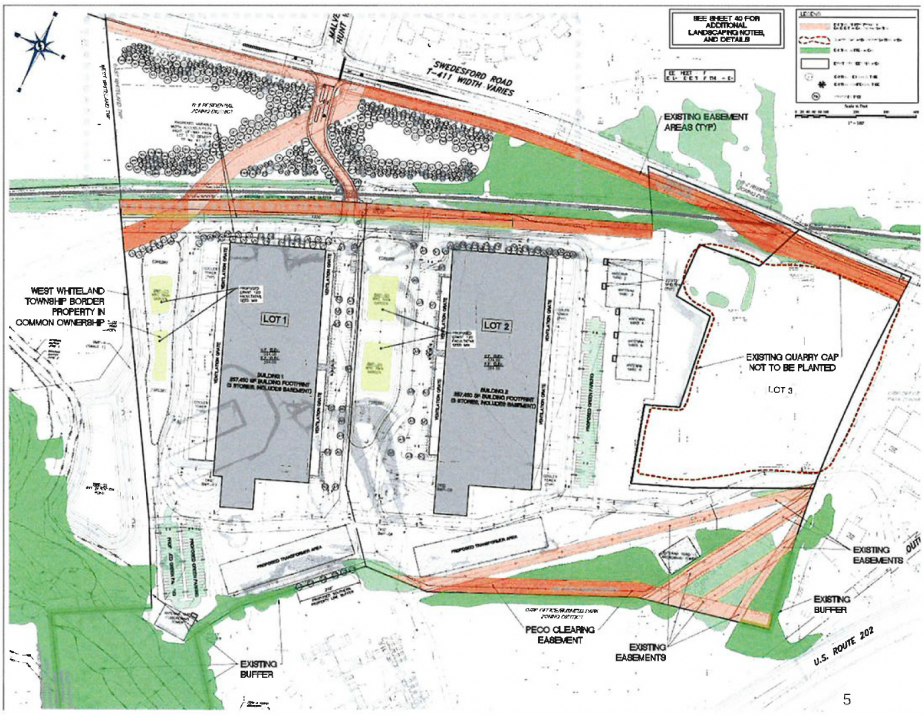


EXHIBIT B

Screenshot of Soils Management Plan, "Portion of Foote Mineral Co. Superfund Site," prepared for the Customer by EcolSciences, Inc.: cover page and page 2 (excerpt, continuing across a page break). Excerpt.

EcolSciences, Inc.
Environmental Management & Regulatory Compliance

SOILS MANAGEMENT PLAN
PORTION OF FOOTE MINERAL CO. SUPERFUND SITE
15 SOUTH BACTON HILL ROAD
UNIVERSAL PARCEL ID (UPI) #s 42-3-130.1 & 42-3-130.2
EAST WHITELAND TOWNSHIP
AND
215 VALLEY CREEK BOULEVARD
UPI # 41-3-4
WEST WHITELAND TOWNSHIP
CHESTER COUNTY, PENNSYLVANIA

Prepared for:
Sentinel Green Fig, LLC
505 5th Avenue, 27th Floor
New York, New York 10017

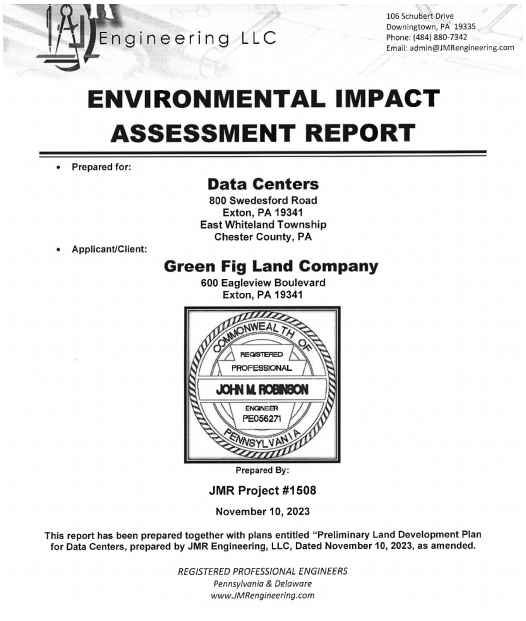
Prepared by:
EcolSciences, Inc.
75 Fleetwood Drive, Suite 250
Rockaway, New Jersey 07866
(973) 366-9500

- **Easements** – There are several easements on the Site, including: two Pennsylvania Electric

Company (PECO) easements and three pipeline easements (Keystone, Sunoco, and PPL Interstate) in the southeastern portion of the Site and two Philadelphia Electric Company easements, a Transcontinental Gas Pipe Line easement, and proposed access/utility right of way easement in the northern portion of the Site.

EXHIBIT C

Screenshot of Environmental Impact Assessment Report prepared for the Customer by JMR Engineering, LLC, November 10, 2023: cover page and page 1, "Site Location and Character." Excerpt.



JMR Engineering LLC

106 Schubert Drive
Downingtown, PA 19335
Phone: (484) 880-7342
Email: admin@JMRengineering.com

ENVIRONMENTAL IMPACT ASSESSMENT REPORT

- Prepared for:

Data Centers
800 Swedesford Road
Exton, PA 19341
East Whiteland Township
Chester County, PA

- Applicant/Client:

Green Fig Land Company
600 Eagleview Boulevard
Exton, PA 19341

COMMONWEALTH OF PENNSYLVANIA
REGISTERED PROFESSIONAL
JOHN M. ROBINSON
ENGINEER
PE056271

Prepared By:

JMR Project #1508

November 10, 2023

This report has been prepared together with plans entitled "Preliminary Land Development Plan for Data Centers, prepared by JMR Engineering, LLC, Dated November 10, 2023, as amended.

REGISTERED PROFESSIONAL ENGINEERS
Pennsylvania & Delaware
www.JMRengineering.com

SITE LOCATION AND CHARACTER

The parcels have an area totaling 70± acres and are located at 13 S. Bacton Road, Exton PA 19341, in East Whiteland Township, Chester County, directly south of the Malvern Hunt residential subdivision, northwest of State Route US-202, and east of Valley Creek Boulevard.

A proposed access easement will be needed for the driveway as it will need to be extended past the 50' Right-of-Way.

The existing site is burdened by several utility easements. These easements include:

1. 75' wide gas pipeline easement
2. Two (2) 35' wide PECO Right-of-Way easements
3. 50' wide gas Sunoco pipeline easement
4. 30' wide interstate energy pipeline easement
5. Two (2) 40' wide PECO Right-of-Way easement
6. 50' wide Philadelphia Electric Co. Right-of-Way easement.

The project proposes some minor roadway development within some easement areas, but in general, the areas within the easements will not be affected.

1

EXHIBIT D

Still from drone footage of the PECO Planebrook Substation and the adjoining Customer Property, April 27, 2026, showing the new monopole structures, the access road and staging areas running between them, and the absence of any fence or marker between the substation's yard and the field where the monopole stands.





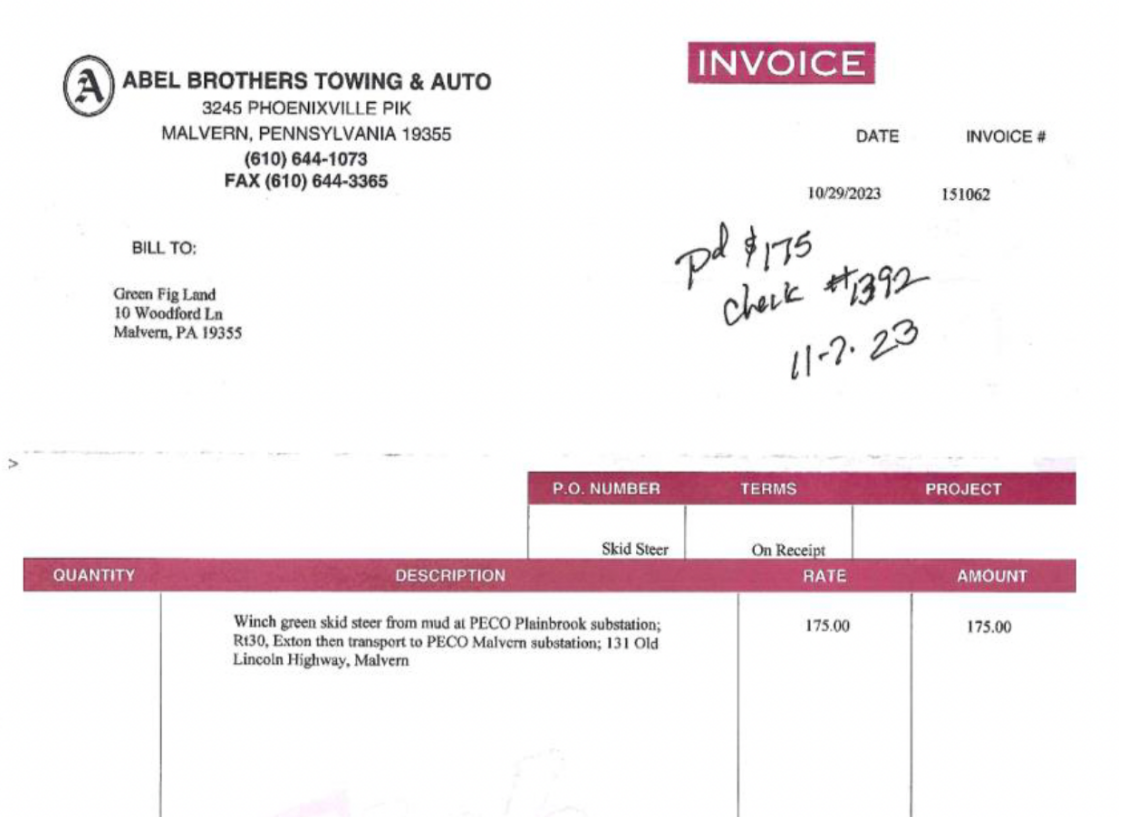
EXHIBIT E

Parcel map of the Customer Property, UPI 42-3-130.1 and 42-3-130.2 and Customer Superfund site. UPI 42.6.1is PECO Planebrook substation.



EXHIBIT F

Abel Brothers Towing & Auto invoice no. 151062 to Green Fig Land, dated October 29, 2023, marked paid by check no. 1392 on November 7, 2023.



ABEL BROTHERS TOWING & AUTO
3245 PHOENIXVILLE PIK
MALVERN, PENNSYLVANIA 19355
(610) 644-1073
FAX (610) 644-3365

INVOICE

DATE	INVOICE #
10/29/2023	151062

Pd $175
Check #1392
11-7-23

BILL TO:

Green Fig Land
10 Woodford Ln
Malvern, PA 19355

P.O. NUMBER	TERMS	PROJECT
Skid Steer	On Receipt	

QUANTITY	DESCRIPTION	RATE	AMOUNT
	Winch green skid steer from mud at PECO Plainbrook substation; Rt30, Exton then transport to PECO Malvern substation; 131 Old Lincoln Highway, Malvern	175.00	175.00

EXHIBIT G

Excerpt of a legal invoice to the Customer, entries dated September 23 and 24, 2025, obtained through a Right-to-Know request to DCED

Riley Riper Hollin & Colagreco
717 Constitution Drive
Suite 201
Exton, PA 19341
Telephone: (610) 458-4400 Fax: (610) 458-4441

October 6, 2025

Re: GREEN FIG LAND COMPANY
Client/Matter - 007135-005
Billing Atty - JR

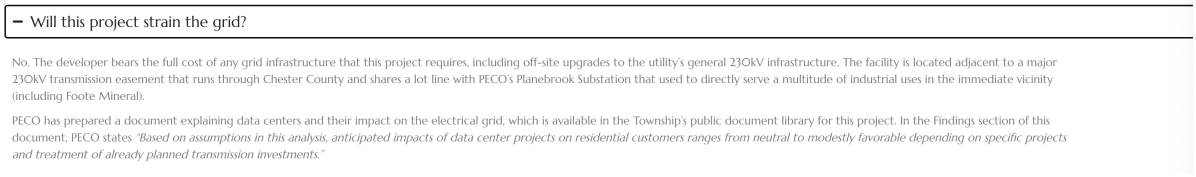
Invoice # 182286
Page # 4

Date	Atty	Description	Hours	Amount
09/17/2025	JR	Final review of E. Fishkin supplemental letter report; Review outstanding issues and upcoming deadlines	0.80	304.00
09/17/2025	KP	Review final E.Fishkin report; review answers to new matter filed by GVSD	0.30	90.00
09/18/2025	EJG	Preparation for and participation in depositions of School District Business Manager and Trip Lukens	10.90	4,360.00
09/18/2025	JR	Preparation for depositions of GVSD business manager and T. Lukens of Valbridge Property Advisors	2.00	760.00
09/18/2025	KP	Prepare for and attend depositions of GVSD business manager and Trip Lukens (GVSD appraiser)	4.00	1,200.00
09/19/2025	EJG	Preparation for and defense of deposition of Charles Lyddane	3.70	1,480.00
09/19/2025	JR	Emails with PECO representative K. McCourt to arrange call; Produce tax year 2026 reports; Issues related to deposition of C. Lyddane	1.60	608.00
09/19/2025	KP	Prepare for and attend Green Fig Designee deposition	3.00	900.00
09/19/2025	MDC	Receipt of notice that pleading filed in each of the three pending appeals; Download GVSD's response to property owner's New Matter; Circulate to RRHC attorneys & maintain pleadings file	0.40	80.00
09/22/2025	JR	Revise tax liability analysis to include tax year 2026 valuations and analysis; Forward summary of analysis to C. Lyddane with discussion of same	1.50	570.00
09/22/2025	KP	Review summary analysis as to potential tax liability based upon varying trial outcomes	0.30	90.00
09/23/2025	EJG	Preparation for and participation in telephone conference with representatives of PECO	1.50	600.00
09/23/2025	EJG	Conference re: exploring with AQUA the availably of water	0.50	200.00
09/23/2025	JR	Telephone conference with K. McCourt of PECO regarding power issues and testimony at trial; Inquiry to Aqua regarding interest in speaking with B. Lewandowski	0.80	304.00
09/23/2025	KP	Strategize as to TY 26 report; attend meeting with PECO as to availability of electric	0.70	210.00
09/24/2025	JR	Prepare subpoena for K. McCourt of PECO; Email same to PECO counsel	0.80	304.00
09/24/2025	KP	Strategize as to subpoena to PECO re testimony; review correspondence with Aqua;Strategize as to uniformity challenge (research school district policies as to aggreation of millage rates)	2.00	600.00

Balances outstanding after 30 days subject to a 1% per month charge.

EXHIBIT H

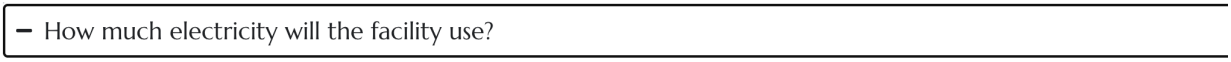
Screenshot of the Customer's project website, "Will this project strain the grid?" and "How much electricity will the facility use" https://projectforgepa.com/faq/ Retrieved: 10/15/2026



− Will this project strain the grid?

No. The developer bears the full cost of any grid infrastructure that this project requires, including off-site upgrades to the utility's general 230kV infrastructure. The facility is located adjacent to a major 230kV transmission easement that runs through Chester County and shares a lot line with PECO's Planebrook Substation that used to directly serve a multitude of industrial uses in the immediate vicinity (including Foote Mineral).

PECO has prepared a document explaining data centers and their impact on the electrical grid, which is available in the Township's public document library for this project. In the Findings section of this document, PECO states *"Based on assumptions in this analysis, anticipated impacts of data center projects on residential customers ranges from neutral to modestly favorable depending on specific projects and treatment of already planned transmission investments."*



− How much electricity will the facility use?

The facility will have an ability to draw a maximum peak of 290 megawatts. Average daily usage will be lower than this.

EXHIBIT I

Screenshot of the transcript from Public hearing held by East Whiteland Township Zoning Hearing Board on application of Green Fig Land appeal 2021-11 on Monday, October 25, 2021. Charlie Lyddance was then and at present Managing Partner of Green Fig (Customer).

CHARLIE LYDDANE: They can come in through Valley Creek, and it can come in through Bacton Hill Road. That's -- and then our fourth entrance is from the bottom coming up. So we have four entrances coming in there. Probably not a lot of that traffic is going to come in there. Most of it is going to come in off of Valley Hill. And there could be 20 people working in there on a shift.

So you're not -- the traffic is only going to be a concern during the construction period, and we're going to bring the construction traffic in from off of Route 30 and 202 -- and the 202 interchange there. There's a road coming back into the back of our property through PECO there. So that's --

38

MICHAEL DEGAN: Go ahead. I'll let you finish.

CHARLIE LYDDANE: That's where we're going to bring the bulk of the traffic in and out in the trucks.

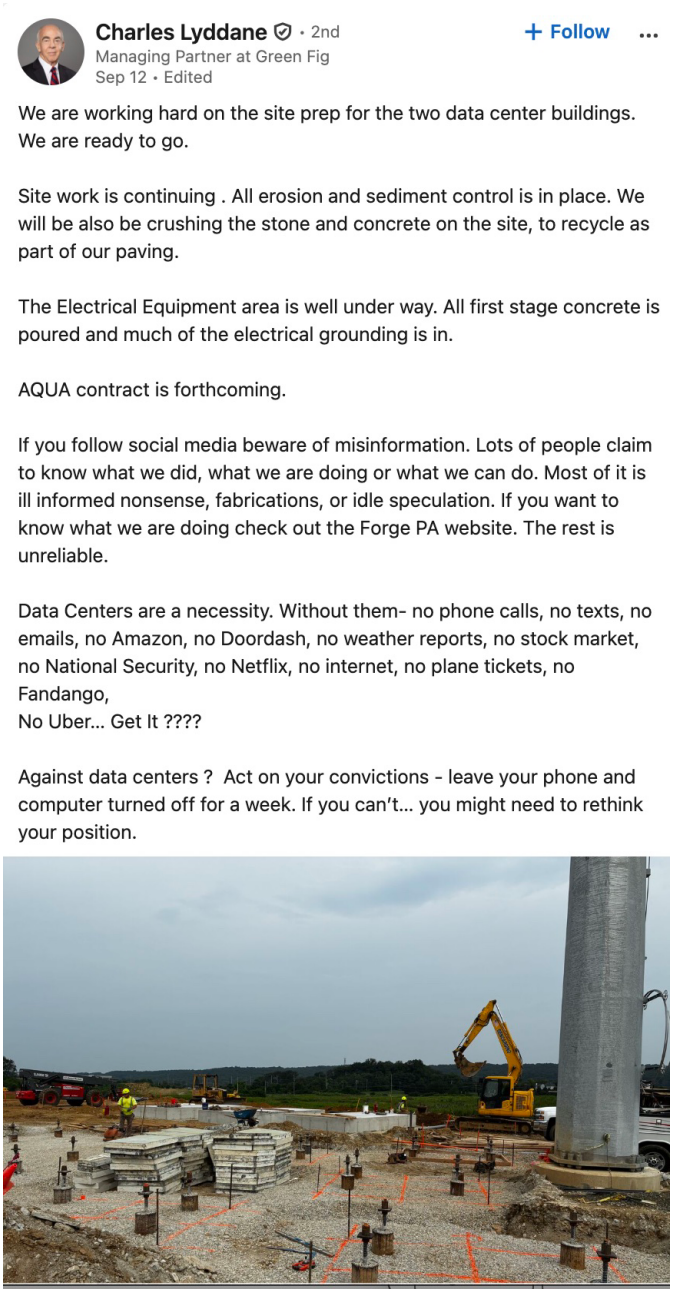
EXHIBIT J

Screenshot of East Whiteland Township permit log record posted Township website for Customer's applications and subsequent issues permit approval dates

Date Received	Permit Number	Description of Project	Date Issued
2/10/2026	B-2026-54	Temporary, premanufactured trailer for use as temporary construction office.	3/17/2026
3/12/2026	B-2026-104	Temporary 8' tall site security fence.	5/22/2026
5/6/2026	Z-2026-50	Installation of a pre-manufactred shed.	6/10/2026
5/6/2026	B-2026-221	Micropiles, footings, concrete pads, fence, and control house.	6/11/2026
5/7/2026	ES-2026-24	Erosion and Sedimentation for 13 S. Bacton Hill Rd.	7/22/2026
5/14/2026	B-2026-242	(3) Temporary pre-manufactured trailers for use as temporary construction offices.	6/9/2026
5/27/2026	B-2026-261	Temporary 10'X36' pre-manufactured trailer for use as temporary contruction office.	6/22/2026
5/29/2026	Z-2026-56	Sign to be attached to existing chain link fence.	6/12/2026
6/4/2026	B-2026-277	Installation of (38) utility poles and (2) associated precast concrete transformer pads.	6/22/2026
6/15/2026	B-2026-291	Application for installation of a pre-manufactured shed to be used to house IT equipment for a construction project team. Zoning approval received under Z-2026-50. Refer to shed details narrative on page 4 of this application. No foundation, no regular occupancy.	6/22/2026
7/1/2026	B-2026-351	Construction of footings, foundations, and associated ground improvements for Buiding 1 only as shown on plans. No structural steel or other work above grade included in this application. Underground plumbing and electrical will bea separate application.	
7/1/2026	B-2026-352	Construction of footings, foundations, and associated ground improvements for Buiding 2 only as shown on plans. No structural steel or other work above grade included in this application. Underground plumbing and electrical will bea separate application.	
7/1/2026	B-2026-353	Prefabricated structure and electrical work associated with previously approved permit B-2026-221. *Reference PHY102 and PHY103 from previously approved Phys Drawings set for conduits and ground grid.	
7/20/2026	B-2026-391	Concrete and masonry foundations, pads, and structures to support associated electrical equipment as shown on attached plans.	
7/28/2026	ES-2026-31	E&S Application for driveway & curbing, footway, intersection improvements and utilities north of CCT bridge.	

Exhibit K

Screenshot of Customer's LinkedIn post by Customer Managing partner documenting electrical work on Customer property



Charles Lyddane · 2nd
Managing Partner at Green Fig
Sep 12 · Edited

+ Follow ...

We are working hard on the site prep for the two data center buildings. We are ready to go.

Site work is continuing . All erosion and sediment control is in place. We will be also be crushing the stone and concrete on the site, to recycle as part of our paving.

The Electrical Equipment area is well under way. All first stage concrete is poured and much of the electrical grounding is in.

AQUA contract is forthcoming.

If you follow social media beware of misinformation. Lots of people claim to know what we did, what we are doing or what we can do. Most of it is ill informed nonsense, fabrications, or idle speculation. If you want to know what we are doing check out the Forge PA website. The rest is unreliable.

Data Centers are a necessity. Without them- no phone calls, no texts, no emails, no Amazon, no Doordash, no weather reports, no stock market, no National Security, no Netflix, no internet, no plane tickets, no Fandango,
No Uber... Get It ????

Against data centers ? Act on your convictions - leave your phone and computer turned off for a week. If you can't... you might need to rethink your position.

Exhibit L

Screenshot of Email Correspondence with Township Manager Steve Brown Confirming That a Fully Constructed 140-Foot Monopole Lacks Required Permits and Has Not Received Uniform Construction Code (UCC) Approval or Verification of Code Compliance.

From: [redacted]
Sent: Sunday, October 4, 2026 8:56 PM
To: Steven Brown <sbrown@eastwhiteland.org>
Cc: Scott Lambert <slambert@eastwhiteland.org>; Peter Fixler <pfixler@eastwhiteland.org>; Clinton Smith <csmith@eastwhiteland.org>; Donna Wikert <dwikert@eastw
Subject: Sentinel Green Fig Permit Questions
Importance: High

Hi Steve,

I see that Sentinel Green Fig has requested 3 new permits:

B-2026-543 Is this for the monopole that was erected in approximately April of this year or is this for another monopole?

Fwd: FW: Sentinel Green Fig Permit Questions
1 message

[redacted]

From: Steven Brown <sbrown@eastwhiteland.org>
Sent: Wednesday, October 14, 2026 8:47 PM
To [redacted]
Cc: Scott Lambert <slambert@eastwhiteland.org>; Peter Fixler <pfixler@eastwhiteland.org>; Clinton Smith <csmith@eastwhiteland.org>; Donna Wikert <c
Ricardo <cricardo@eastwhiteland.org>
Subject: RE: Sentinel Green Fig Permit Questions

[redacted]

I don't have a response to your questions about the water supply and power needs at this point but will follow up on it.

Responses to you other two inquiries are:

- Yes, this is the same pole. The permit application for the monopole and its foundation is being reviewed for consistency with the UCC. The Township pursuing appropriate compliance and enforcement measures — including fines. This review is in process.
- Both buildings will have full basements based on what our Codes Department has advised me and my & Catherine's non-Building Code Official revie If we learn anything to the contrary, I'll let you know.

Steve

Exhibit M

August 20, 2026 Drone Still: High-voltage lines attached to a fully constructed 140-foot monopole on customer property, without required permits, UCC inspection, or code-compliance approval.





Exhibit N

August 20, 2026 Drone Still: Photo of double chain linked gate between PECO substation and Customer property

