



800 North Third Street, Suite 205 • Harrisburg, Pennsylvania 17102
Telephone (717) 901-0600 • Fax (717) 901-0611 • www.energypa.org

Via Hand Delivery

March 30, 2011

Rosemary Chiavetta, Esq.
Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

**RE: PETITION FOR EXTENSION OF TIME *NUNC PRO TUNC* AND FOR
TEMPORARY WAIVER OF ANNUAL REPORTING REQUIREMENT
DOCKET NO. L-2008-2069115**

Dear Secretary Chiavetta,

Enclosed for filing, please find an original and three (3) copies of the Energy Association of Pennsylvania's Petition in the above-referenced Docket Number.

Very truly yours,

A handwritten signature in black ink, appearing to read "Donna M.J. Clark", is written over the closing text.

Donna M.J. Clark
Vice President & General Counsel

cc: Certificate of Service

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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of the Energy Association of Pennsylvania for an Expedited Order Granting an Extension of Time *Nunc Pro Tunc* and Granting a Temporary Waiver of Annual Reporting Requirement : : **Docket No. L-2008-2069115**

PETITION FOR EXTENSION OF TIME *NUNC PRO TUNC* AND FOR TEMPORARY WAIVER OF ANNUAL REPORTING REQUIREMENT

NOW COMES, the Energy Association of Pennsylvania (“EAP”), acting on behalf of its natural gas distribution company members¹ and petitions the Pennsylvania Public Utility Commission (“PUC” or “Commission”) pursuant to 52 Pa. Code § 1.15 and 5.41 for an expedited Order: (1) extending the time *nunc pro tunc* for ninety (90) days to file tariff revisions required pursuant to a Final Rulemaking Order Re: Licensing Requirements for Natural Gas Suppliers, Docket No. L-2008-2069115 (“Licensing Order”) entered June 17, 2010; and (2) granting a temporary waiver of the annual reporting requirement established at 52 Pa. Code §62.111(c)(5). In support of this petition, EAP states the following:

1. On January 1, 2011, final regulations located at 52 Pa. Code §62.111 (Bonds or other security) were published in the PA Bulletin and became effective.

2. Pursuant to the Licensing Order, “within 30 days after the date that these regulations become effective, all natural gas distribution companies shall file with the Commission’s Secretary revised tariff pages consistent with this order and these regulations.” See Licensing Order at p. 30, paragraph 9. Revised tariff pages were due on January 31, 2011.

1. The Energy Association of Pennsylvania’s natural gas distribution company members include: Columbia Gas of PA, Equitable Gas, National Fuel Gas Distribution Corp., PECO Energy Company, Peoples Natural Gas, Philadelphia Gas Works, UGI Central Penn Gas, UGI Penn Natural Gas, UGI Utilities, Inc., and Valley Energy.

3. Through inadvertence, not all natural gas distribution companies (“NGDCs”) filed revised tariff pages within the thirty day period provided in the Licensing Order.

4. EAP requests an expedited Order *nunc pro tunc* pursuant to Pa. Code §1.15 (a) (1), granting an extension of time for the filing of revised tariff pages for a period of ninety (90) days beginning on January 31, 2011 so as to enable NGDCs to make the necessary filing on or before May 2, 2011.

5. EAP contends that granting the extension *nunc pro tunc* to file revised tariff pages will not otherwise delay the effectiveness or implementation of the final regulations at this docket.

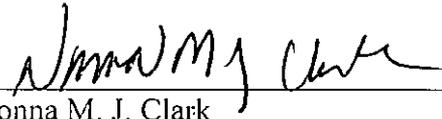
6. Additionally, the final regulations provide, in part, at 52 Pa. Code §62.111(c)(5) that “[t]he NGDC shall file an annual report with the Secretary no later than April 30 of each year. The report must contain the following information for the prior calendar year...” (Emphasis added).

7. Inasmuch as the instant rulemaking became effective on January 1, 2011, the report due no later than April 30, 2011 would provide information for 2010, a time period during which the instant regulations were not finalized. Thus, any information reported would not inform the Commission regarding the criteria and rules used by NGDCs under the revised regulations.

8. Accordingly, EAP requests the Commission grant a waiver of the initial annual report which is now due no later than April 30, 2011 and set the filing for the *first annual* report under this rulemaking for April 30, 2012.

WHEREFORE, the Energy Association of Pennsylvania respectfully requests the Commission to issue an expedited order: (1) granting natural gas distribution companies an extension of time *nunc pro tunc* for ninety (90) days to file any revised tariff pages required under the Licensing Order and final regulations at 52 Pa. Code §62.111 and (2) granting a

temporary waiver for one year of the annual reporting requirement established at 52 Pa. Code §62.111(c)(5).

A handwritten signature in black ink, appearing to read "Donna M. J. Clark", is written over a horizontal line.

Donna M. J. Clark
Vice President and General Counsel
Energy Association of Pennsylvania
800 North Third Street, Suite 205
Harrisburg, Pennsylvania 17102-2025
Atty. ID # 39866

Certificate of Service

I hereby certify that I have served a copy of the foregoing “**Petition for Extension of Time *Nunc Pro Tunc* and for Temporary Waiver of Annual Reporting Requirement**” on the persons listed below, by means of hand-delivery or first-class mail, as indicated:

By Hand-Delivery:

Hon. Robert F. Powelson, Chairman
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, PA 17105-3265

Hon. John F. Coleman, Vice Chairman
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, PA 17105-3265

Hon. James H. Cawley, Commissioner
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, PA 17105-3265

Hon. Wayne E. Gardner, Commissioner
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Hon. Tyrone J. Christy, Commissioner
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, PA 17105-3265

By First-Class Mail Delivery:

Irwin A. Popowsky, Esq.
Tanya McCloskey, Esq.
Office of Consumer Advocate
555 Walnut Street
Forum Place, Fifth Floor
Harrisburg, PA 17101-1923

Robert Blake, VP, Regulatory Affairs
MXenergy
10010 Junction Drive, Suite 104-S
Annapolis Junction, Maryland 20701

William R. Lloyd, Jr., Esq.
Small Business Advocate
Suite 1102, Commerce Building
300 North Second Street

Sandra Minich Guthorn, Manager
PEPCO Energy Services
1300 North 17th Street, Suite 1600
Arlington, Virginia 22209

J. Edward Simms, Esq.
Office of Trial Staff
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, PA 17105-3265

Debra H. Rednik, Esq.
Marissa Bach, Esq.
Hess Corporation
One Hell Plaza
Woodbridge, New Jersey 07095

The Mack Services Group
P. O. Box 557
Berwyn, PA 19312

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SECRETARY'S OFFICE

Todd S. Stewart, Esq.
Hawke McKeon Sniscak
100 North Tenth Street
P.O. Box 1778
Harrisburg, PA 17105

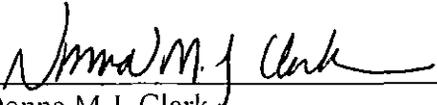
John F. Povilaitis, Esq.
Buchanan Ingersoll & Rooney P.C.
17 North Second Street, 15th Floor
Harrisburg, PA 17101

Jay W. Dawson
T.W. Phillips Gas and Oil Company
205 North Main Street
Butler, PA 16001

Tim Merrill, General Manager
NRG Energy Center
111 South Commons
Pittsburgh, PA 15212

Michael W. Gang, Esq.
Michael W. Hassell, Esq.
Andrew S. Tubbs, Esq.
Post & Schell P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101

Charles E. Thomas, Jr.
Thomas Thomas Niesen & Kennard LLP
212 Locust Street
Harrisburg, PA 17108



Donna M.J. Clark
Vice President and General Counsel
Energy Association of Pennsylvania