

Karen O. Moury
717 237 4820
Karen.moury@bipc.com

409 North Second Street, Suite 500
Harrisburg, PA 17101
T 717 237 4800
F 717 233 0852
www.buchananingersoll.com

November 13, 2014

VIA E-FILING

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

Re: Enrico Partners v. Blue Pilot Energy, LLC
Docket Nos. C-2014-2432979

Dear Secretary Chiavetta:

On behalf of Blue Pilot Energy, LLC, I have enclosed for electronic filing the Motion for Extension of Time to File Briefs in the above-captioned matter.

Copies have been served on all parties as indicated in the attached certificate of service.

Very truly yours,



Karen O. Moury

KOM/tg
Enclosure
cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ENRICO PARTNERS	:	
	:	
v.	:	Docket No. C-2014-2432979
	:	
BLUE PILOT ENERGY, LLC	:	

MOTION FOR EXTENSION OF TIME TO FILE BRIEFS

TO ADMINISTRATIVE LAW JUDGE JOEL H. CHESKIS:

Pursuant to 52 Pa. Code § 1.15, Blue Pilot Energy, LLC (“BPE”), by and through its counsel, Karen O. Moury and Buchanan Ingersoll & Rooney PC, files this Motion requesting an extension of time to file the Main Briefs and the Reply Briefs in the above-captioned matter, and in support hereof, avers as follows:

1. By Briefing Order dated October 8, 2014, Enrico Partners and BPE were directed to file Main Briefs on or before November 17, 2014 and Reply Briefs on or before December 1, 2014.

2. By this Motion, BPE seeks an extension of time to December 3, 2014 for the filing of Main Briefs and to December 12, 2014 for the filing of Reply Briefs. BPE is authorized to represent that counsel for Enrico Partners joins this Motion.

3. Enrico Partners and BPE are continuing to engage in settlement discussions in an effort to resolve this matter without the need for an adjudication by the Commission. More time to file the briefs would facilitate these efforts.

4. Also, Enrico Partners and BPE are aware that the Commission is scheduled to act on the Petition for Interlocutory Review filed by the Office of Consumer Advocate and the Office of Attorney General in the matter of *Commonwealth of Pennsylvania, et. al. v.*

Blue Pilot Energy, LLC, Docket No. C-2014-2427655, on November 13, 2014. The Commission's order in that matter is expected to provide some direction to the parties on the issues presented in this proceeding. Additional time for filing a brief would enable the parties to fully evaluate the effects of that order on settlement discussions, as well as a presentation of their litigation positions if settlement is not possible.

WHEREFORE, Blue Pilot Energy, LLC, joined by Enrico Partners, respectfully requests that the Commission grant this Motion for Extension of Time to File Briefs, and that a Second Briefing Order be issued extending the time for the filing of Main Briefs to December 3, 2014 and Reply Briefs to December 12, 2014.

Dated: November 13, 2014

Respectfully submitted,



Karen O. Moury
PA Attorney I.D. # 36879
BUCHANAN INGERSOLL & ROONEY PC
409 North Second Street
Suite 500
Harrisburg, PA 17101-1357
(717) 237-4820

Attorneys for Blue Pilot Energy, LLC

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ENRICO PARTNERS

v.

BLUE PILOT ENERGY, LLC

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:
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Docket No. C-2014-2432979

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of § 1.54 (relating to service by a party).

Via First-Class Mail

Administrative Law Judge Joel H. Cheskis
Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

Enrico Partners, L.P.
795 E. Lancaster Avenue
Villanova, PA 19085

W. Kent Silvers, Jr.
795 East Lancaster Avenue, Suite 200
Villanova, PA 19085
ksilvers@provogroup.com

Dated this 13th day of November, 2014.



Karen O. Moury, Esq.