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Via Electronic Filing

January 7, 2016

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

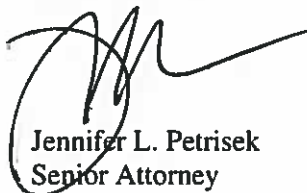
**Re: Docket Number C-2015-2508515 – Leslie Rhodes v. Peoples Natural Gas Company LLC
Motion for Leave to File Answer Nunc Pro Tunc**

Dear Secretary Chiavetta:

On behalf of Peoples Natural Gas Company LLC (“Peoples”), please find enclosed for filing a Motion of Peoples for Leave to File an Answer Nunc Pro Tunc in the above-noted docket.

Please contact the undersigned at (412) 208-6834 should you have any questions or concerns regarding this matter.

Very truly yours,



Jennifer L. Petrisek
Senior Attorney

cc: All Parties listed on the Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

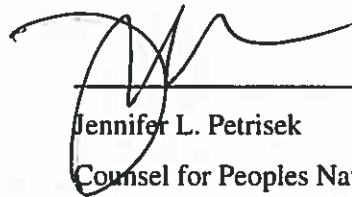
LESLIE RHODES)	
)	
V.)	DOCKET NO. C-2015-2508515
)	
PEOPLES NATURAL GAS COMPANY LLC)	

NOTICE TO PLEAD

To:

**Leslie A. Rhodes
360 Christy Road
Tarentum, Pennsylvania 15084**

You are hereby notified that Peoples Natural Gas Company LLC (“Peoples”) has filed the attached Motion, to which you may submit a response within twenty (20) days. If no response is filed, the presiding office can grant the Motion, without requiring other proof. All pleadings, such as a response to the attached Motion, must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy served on the undersigned counsel for Peoples.



Jennifer L. Petrisek
Counsel for Peoples Natural Gas Company LLC
225 North Shore Drive
Pittsburgh, PA 15212
412-208-6834 (voice)
412-208-6577 (facsimile)
Jennifer.petrisek@peoples-gas.com

Dated: January 7, 2016

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

LESLIE RHODES)	
)	
V.)	DOCKET NO. C-2015-2508515
)	
PEOPLES NATURAL GAS COMPANY LLC)	

**MOTION OF PEOPLES NATURAL GAS COMPANY LLC FOR LEAVE TO FILE ANSWER
NUNC PRO TUNC**

Peoples Natural Gas Company LLC (“Peoples” or the “Company”), pursuant to 52. Pa. Code §5.103(1) respectfully requests that it be permitted to file an Answer Nunc Pro Tunc in the above-captioned Formal Complaint beyond the time period required by the Commission’s regulations. In support thereof, Peoples represents and avers as follows:

1. On October 7, 2015, Leslie A Rhodes (“Complainant”) filed a Formal Complaint with the Pennsylvania Public Utility Commission (“Commission”) in which she alleged problems related to the the billing of natural gas service she receives from Peoples (the “Formal Complaint”). The Formal Complaint was assigned Docket Number C-2015-2508515 and was e-served by the Commission on October 16, 2015.

2. The Commission’s Regulations at 52 Pa. Code §5.61(a) require an answer to a formal complaint “be filed with the Commission within 20 days after the date of service” unless a different time is prescribed by statute or by the Commission. Thus, Peoples’ answer should have been filed on, or before, November 5, 2015.

3. Peoples has registered to receive service of Formal Complaints via e-service with delivery to its counsel, Jennifer L. Petrisek (“Counsel”).

4. On October 16, 2015, Peoples experienced a system-wide internet and email system outage which lasted the majority of the business day. The outage occurred as a result of a cut fiber optic cable maintained by Peoples' service provider, CenturyLink. During the outage, Peoples had no access to external email (incoming or outgoing) or internet-based systems. During the outage, all external electronic mail sent to a Peoples' email address was to be held by a cloud-based service and forwarded upon the conclusion of the outage. However, at least four (4) external emails from the Commission to Peoples' Counsel on October 16th were never delivered to Counsel's electronic mail inbox – one of which was the email serving a copy of the Formal Complaint in this docket upon the Company.

5. On January 4, 2016, a representative from the Commission's Administrative Law Judge office contacted Peoples to discuss whether an Answer would be filed to the Formal Complaint in this docket.

6. After receiving this contact, Counsel reviewed all incoming external email messages for October 16, 2015 and the following week and did not locate a service email from the Commission for this Formal Complaint. Counsel then contacted Peoples' internal technical teams and discovered a carbon-copy of the service email from October 16, 2015 that was sent to an ancillary email box. This was the first written notice Peoples received of this Formal Complaint.

7. Through this Motion, Peoples respectfully requests a waiver of the time requirements set forth in 52 Pa. Code §5.61(a) and seeks permission to file an Answer to the Formal Complaint on or before January 19, 2016.

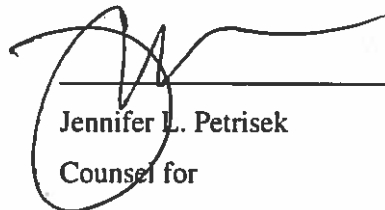
8. Peoples does not believe its filing of the attached Answer beyond the time permitted by the Commission's Regulation's will prejudice Complainant because:

- a. The Complainant's natural gas service is active, has not been interrupted since the filing of the Formal Complaint and no adverse action has been taken by Peoples regarding the Complainant's service;
- b. No hearing has been scheduled in connection with this matter; therefore, Complainant has still has ample time to conduct discovery on any issues raised in the Company's Answer, if she so desires; and

- c. Complainant does not have a right under the Commission's Regulations to respond to the Company's Answer, thus the delay does deny the Complainant any procedural rights.

WHEREFORE, Peoples Natural Gas Company LLC, based upon the foregoing, respectfully requests that this Motion be granted.

Respectfully submitted,

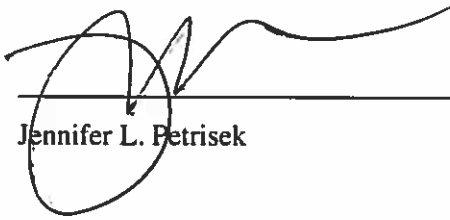


Jennifer L. Petrisek
Counsel for
Peoples Natural Gas Company LLC

Dated: January 7, 2016

AFFIDAVIT

I, Jennifer L. Petrisek, Senior Attorney for Peoples Natural Gas Company LLC, am authorized to make this affidavit on its behalf, and I verify that the information provided in the foregoing document(s) is true and correct to the best of my knowledge, information and belief. I understand that false statements therein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsifications to authorities.



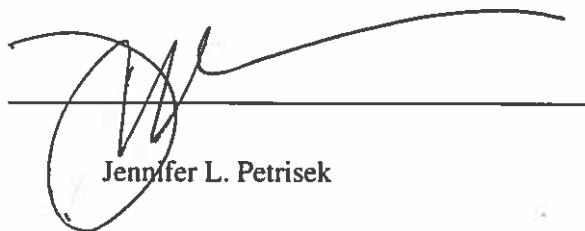
Jennifer L. Petrisek

CERTIFICATE OF SERVICE

I hereby certify that I have on this 7th day of January, 2016 served a true copy of Peoples Natural Gas Company LLC's Motion for Leave to File Answer Nunc Pro Tunc upon the individuals listed below in the manner stated:

VIA REGULAR MAIL:

Leslie A. Rhodes
360 Christy Road
Tarentum, Pennsylvania 15084



Jennifer L. Petrisek

Dated this 7th day of January, 2016