



An Exelon Company

Michael S. Swerling
Assistant General Counsel

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PECO Legal
2301 Market Street, S23-1
Philadelphia, PA 19103

November 20, 2015

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

Re: PAPUC, I&E v. PECO, Docket No. C-2015-2511928

Dear Secretary Chiavetta:

Enclosed please find PECO Energy Company's Motion for Extension of Time to Answer Formal Complaint in the above-referenced proceeding.

If you have any questions about this filing, please do not hesitate to contact me at 215.841.4220.

Very truly yours,

A handwritten signature in black ink, appearing to read "M. Swerling", written over the typed name and title.

Michael S. Swerling
Assistant General Counsel

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC UTILITY	:	
COMMISSION, BUREAU OF	:	
INVESTIGATION AND	:	
ENFORCEMENT	:	
Complainant	:	Docket No. C-2015-2511928
v.	:	
PECO ENERGY COMPANY	:	
Respondent	:	

CERTIFICATE OF SERVICE

I, Michael S. Swerling, hereby certify that on November 20, 2015 I served a copy of PECO's Motion for Extension of Time to Answer Formal Complaint upon the persons indicated below, which service satisfies the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Via Federal Express

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105-3265

Via Certified Mail and Email

Heidi L. Wushinske, Prosecuting Attorney
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
P.O. Box 3265
Harrisburg, PA 17105-3265

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC UTILITY :
COMMISSION, BUREAU OF :
INVESTIGATION AND :
ENFORCEMENT :

Complainant :

Docket No. C-2015-2511928

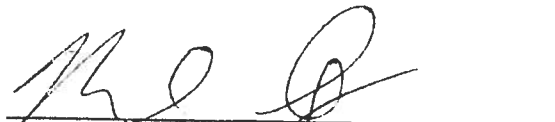
v. :

PECO ENERGY COMPANY :

Respondent :

VERIFICATION

I, Michael S. Swerling, hereby declare that I am counsel for PECO Energy Company; that as such I am authorized to make this verification on its behalf; that the facts set forth in the foregoing Pleading are true to the best of my knowledge, information and belief, and that I make this verification subject to the penalties of 18 Pa. C.S. § 4904 pertaining to false statements to authorities.



Michael S. Swerling
Assistant General Counsel
PECO Energy Company
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Philadelphia, PA 19103
(215) 841-4220
michael.swerling@exeloncorp.com

Dated: November 20, 2015

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY	:	
COMMISSION, BUREAU OF	:	
INVESTIGATION AND	:	
ENFORCEMENT	:	
Complainant	:	Docket No. C-2015-2511928
	:	
v.	:	
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

**MOTION OF PECO ENERGY COMPANY
FOR EXTENSION OF TIME TO ANSWER FORMAL COMPLAINT**

PECO Energy Company, (“PECO” or the “Company”) hereby files this motion (pursuant to 52 Pa.Code § 5.103) for a thirty (30) day extension of time to file an Answer to the Formal Complaint and states the following:

1. On November 4, 2015, the Pennsylvania Public Utility Commission’s (the “Commission’s”) Bureau of Investigation and Enforcement (“I&E”) filed a Formal Complaint with seventy-eight (78) counts alleging that PECO has, for the past 45 years, been violating the Federal Gas Pipeline Safety Regulations (49 U.S.C.A. §§ 60101, et seq. as implemented by 49 C.F.R. Parts 191-193, 195 and 199, 49 C.F.R. §§ 191-193, 195 and 199). The Complaint was served on PECO on November 6, 2015.

2. According to 52 Pa.Code § 5.61(a), PECO has twenty (20) days from the November 6 service date to file its Answer with the Commission’s Secretary’s Office. Therefore, PECO’s Answer to the Formal Complaint is due on November 30, 2015.¹

3. Pursuant to 52 Pa.Code § 1.15 and for good cause shown, the Commission may grant extensions of time for acts that the Pennsylvania Code requires be completed within a specified amount of time.

¹ PECO’s Answer is due on November 26, 2015, which is Thanksgiving Day. According to 52 Pa.Code § 1.12(a), if the due date is on a legal holiday, it will be extended to the next business day, which is November 30, 2015.

4. Accordingly, PECO respectfully requests a thirty (30) day extension of time to answer the Formal Complaint for the following reasons, which serve as the foundation for a showing of good cause to grant such request.

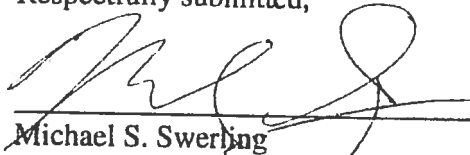
5. Specifically, the Formal Complaint raises significant and complex questions regarding the settings of PECO's natural gas distribution system. PECO believes that its investigation (for purposes of crafting its Answer) will be best served if it has additional time to conduct its investigation and analysis of the claimed violations (which involve the settings for over 70 individual regulator stations over the past 45 year period). PECO's Answer also will need to incorporate its view of the applicable governing authority (e.g. the Federal Safety Code, PHMSA interpretations and advisory bulletins, and Commission regulations).

6. If the Commission grants PECO's motion, the Answer would be due on December 21, 2015.

7. Counsel for I&E has informed PECO that it does not oppose PECO's request for an extension.

WHEREFORE, for the foregoing reasons, PECO respectfully requests that this Honorable Commission grant its Motion for Extension of Time to File Answer to Complaint.

Respectfully submitted,



Michael S. Swerling
Assistant General Counsel
PECO Energy Company
2301 Market Street, S23-1
Philadelphia, PA 19103
(215) 841-4220

Dated: November 20, 2015