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December 21, 2016

Via Electronic Filing

Rosemary Chiavetta, Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Respond Power LLC v. Pennsylvania Electric Company
Docket Nos. C-2016-2576287

Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company for Approval of a Default Service Program for the Period Beginning June 1, 2017 through May 31, 2019, Docket Nos. P-2015-2511333; P-2015-2511351; P-2015-2511355; P-2015-2511356

Petition of Respond Power LLC for Issuance of Ex Parte Emergency Order,
Docket No. P-2016-2572934

Dear Secretary Chiavetta:

Enclosed for electronic filing please find Respond Power LLC's Motion for Extension of Time with regard to the above-referenced matters. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,



Karen O. Moury
KOM/lww

Enclosure

cc: Hon. David A. Salapa w/enc.
Certificate of Service w/enc.

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of Motion for Extension of Time upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54

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Dated: December 21, 2016

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Respond Power LLC	:	
	:	
v.	:	Docket No.: C-2016-2576287
	:	
Pennsylvania Electric Company	:	
	:	
Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company for Approval of a Default Service Program for the Period Beginning June 1, 2017 through May 31, 2019	:	Docket Nos.: P-2015-2511333 P-2015-2511351 P-2015-2511355 P-2015-2511356
	:	
Petition of Respond Power LLC for Issuance of Ex Parte Emergency Order	:	Docket No. P-2016-2572934
	:	

MOTION FOR EXTENSION OF TIME

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE DAVID A. SALAPA:

Respond Power LLC (“Respond Power”) files this Motion for Extension of Time, pursuant to Section 1.15 of the Commission’s regulations, 52 Pa. Code § 1.15, and in connection therewith avers as follows:

1. On November 18, 2016, Respond Power filed a Complaint against Pennsylvania Electric Company (“Penelec” or “Company”) Tariff Electric Pa. P.U.C. No. S-1 filed on October 28, 2016 with an effective date of August 1, 2016.
2. On November 18, 2016, the Commission’s Secretary formally served the Complaint on Penelec.
3. On December 8, 2016, Penelec timely filed an Answer and New Matter. On the same date, Penelec filed a Motion for Judgment on the Pleadings.

4. Respond Power's Reply to the New Matter and Answer to the Motion for Judgment on the Pleadings are due on December 28, 2016.

5. Counsel for Respond Power has several family obligations during the weeks of December 26, 2016 and January 2, 2017, including commitments related to the Christmas holiday, her father's 90th birthday celebration, a son coming home from Poland for a brief holiday visit and medical appointments for her elderly parents. A specific celebration is scheduled that necessitates traveling on December 27, 2016 and December 28, 2016, rendering it extremely difficult for counsel to finalize and file the responsive pleadings by December 28, 2016.

6. December 26, 2016 and January 2, 2017 are national and Pennsylvania holidays.

7. Based upon these family commitments and the due date falling between Christmas and New Year's Day, and national holidays occurring on the Monday following each of these holidays, Respond Power respectfully requests a ten-day extension for the filing of a Reply to the New Matter and an Answer to the Motion for Motion for Judgment on the Pleadings.

8. Respond Power has been advised by counsel for Penelec that the Company opposes this request.

9. In the interest of time, Respond Power has not consulted with the other parties who have filed intervention notices or petitions in this proceeding regarding their position on this request. Such parties are free to weigh in with their positions, if any, upon the filing of this Motion.

10. Particularly since Penelec and other parties have no opportunity to respond to the responsive pleadings of Respond Power that are due on December 28, 2016, Respond Power does not believe that a ten-day extension would adversely impact their future obligations with respect

to the timing of due dates. To the extent that an extension would affect future filing dates, Respond Power would not oppose a corresponding ten-day extension.

11. Additionally, Respond Power asserts that an extension of the length requested by Respond Power would not materially delay the orderly disposition of this proceeding.

12. Section 1.15 authorizes the presiding officer to grant extensions of time for good cause shown.

13. Respond Power submits that the family obligations cited above of its counsel, magnified by the need for travel on the due date for the filings, combined with the impact of the holidays on work schedules, constitute good cause for a ten-day extension.

WHEREFORE, Respond Power LLC respectfully requests that Administrative Law Judge David A. Salapa grant this Motion for Extension and direct that Respond Power LLC file responsive pleadings to the Answer and New Matter of Pennsylvania Electric Company and the Motion for Judgment on the Pleadings of Pennsylvania Electric Company on or before January 9, 2017.



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Dated: December 21, 2016

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