

August 15, 2017

VIA E-FILE

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

**Re: Joint Petition for Generic Investigation or Rulemaking Regarding "Gas-On-Gas"
Competition Between Jurisdictional Natural Gas Distribution Companies;
Docket No. P-2011-2277868**

**Generic Investigation Regarding Gas-On-Gas Competition Between Jurisdictional
Natural Gas Distribution Companies; Docket No. I-2012-2320323**

**MOTION FOR EXTENSION OF TIME FOR ALL PARTIES TO FILE REPLIES TO
COMMENTS**

Dear Secretary Chiavetta:

Pursuant to 52 Pa. Code § 1.15(a)(1), Peoples Natural Gas Company LLC (including its Equitable Division) and Peoples Gas Company LLC (formerly Peoples TWP LLC) (together, "Peoples") file this Motion for an Extension of Time for All Parties to File Replies to Comments in the above-captioned proceeding. I have spoken with counsel for each of the parties who submitted Comments in this proceeding and am authorized to state that they concur in this request.

By Commission Order entered May 4, 2017, the Commission directed interested parties to submit Comments regarding the specific nature of the restrictions and suggestions for standardized tariff provisions to be utilized by natural gas distributions companies that offer "flex rates." Comments were due within 90 days of the date that the Order was entered (or by August 2, 2017). Parties were offered an opportunity to file Replies to Comments, which were to be filed within twenty days thereafter (or by August 22, 2017).

The Commission may extend the deadline for performing an act if a motion filed before the expiration of the period in question demonstrates good cause for the extension. 52 Pa. Code § 1.15(a)(1). Upon reviewing the Comments filed on August 2, 2017, Peoples and the other commenting parties believe that they can work together to resolve some or all of the issues in this proceeding. Peoples and the other commenting parties therefore request that the Commission extend the deadline for all parties to file Replies to Comments for a period of thirty days (or until September 21, 2017).

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If you have any questions regarding this filing, please direct them to me. Thank you for your attention to this matter.

Sincerely,

COZEN O'CONNOR



By: David P. Zambito
Counsel for *Peoples Natural Gas Company LLC*
and *Peoples Gas Company LLC*

DPZ/kmg
Enclosures

cc: Cheryl Walker Davis, Director, Office of Special Assistants
ra-OSA@pa.gov
Per Certificate of Service

CERTIFICATE OF SERVICE
Docket Nos. P-2011-2277868 and I-2012-2320323

I hereby certify that I have this day served a true copy of the Letter Motion of Peoples Natural Gas Company LLC (including the Equitable Division) and Peoples Gas Company LLC, for Extension of Time for All Parties to File Replies to Comments, upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA E-MAIL AND FIRST CLASS MAIL:

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Date: August 15, 2017



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