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File #: 167945

March 24, 2020

**VIA E-MAIL (EBARNES@PA.GOV)
VIA ELECTRONIC FILING**

Honorable Elizabeth Barnes
Administrative Law Judge
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor West
PO Box 3265
Harrisburg, PA 17105-3265

Re: John, Janet Holder and June Maculesky c/o Janet Holder v. PPL Electric Utilities Corporation - Docket Nos. F-2019-3008809, F-2019-3008832

Your Honor:

Pursuant to Section 1.15(a) of the Pennsylvania Public Utility Commission's ("Commission") regulations, 52 Pa. Code § 1.15(a), and the Emergency Order "*Re: Suspension of Regulatory and Statutory Deadlines; Modification to Filing and Service Requirements*" issued by the Commission at Docket No. M-2020-3019262 on March 20, 2020 ("*Emergency Order*"), PPL Electric Utilities Corporation ("PPL Electric" or the "Company") respectfully requests a thirty (30) day extension to the deadlines for serving objections and answers to the Interrogatories and Requests for Production of Documents Propounded by John and Janet Holder and June Maculesky ("Complainants") Set III, which the Complainants served on March 13, 2020, by first class mail and consists of 185 discovery requests.

Good cause for the requested extension of time exists in light of the circumstances surrounding the COVID-19 pandemic identified in the *Emergency Order*. PPL Electric's witnesses have limited availability, are focused on other essential tasks, or are otherwise unavailable to review, gather information and documents and respond to the Complainants' 185 discovery requests contained in their Set III discovery. Moreover, the Complainants have not consented to electronic service of documents, nor have they provided an e-mail address. Therefore, due to the limited availability of resources to prepare and serve hard copies of objections and answers to

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these 185 discovery requests, the Company will need additional time to serve the Complainants with the objections and answers.

In addition, the Complainants will not be prejudiced by this extension of time. A Hearing Cancellation notice was issued on March 17, 2020, which cancelled the hearings previously scheduled for April 9, 2020. As such, a thirty (30) day extension of time for the Company to serve objections and answers to the Set III discovery will not unduly delay the hearing.

Therefore, PPL Electric respectfully requests that the time to object and answer the Complainants' Set III be extended thirty (30) days, such that objections are due by April 27, 2020, and answers are due by May 6, 2020.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Garrett P. Lent". The signature is fluid and cursive, with a large initial "G" and "L".

Garrett P. Lent

GPL/jl

cc: Rosemary Chiavetta
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA FIRST CLASS MAIL

June Maculesky
1823 Butztown Road
Bethlehem, PA 18017

Janet Holder
(POA for June Maculesky)
2424 Lafayette Avenue
Bethlehem, PA 18017

John & Janet Holder
2424 Lafayette Avenue
Bethlehem, PA 18017

Date: March 24, 2020



Garrett P. Lent