

**STEVENS & LEE**  
**LAWYERS & CONSULTANTS**

17 North Second Street  
16th Floor  
Harrisburg, PA 17101  
(717) 234-1090 Fax (717) 234-1099  
www.stevenslee.com

Direct Dial: (717) 255-7365  
Email: mag@stevenslee.com  
Direct Fax: (610) 988-0852

March 30, 2020

VIA ELECTRONIC FILING

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

**RE: Pennsylvania Public Utility Commission, Bureau of Investigation and Enforcement  
v. Verde Energy USA, Inc.  
Docket No. C-2020-3017229**

Dear Secretary Chiavetta:

Enclosed for filing on behalf of Verde Energy USA Inc. is its Motion for Extension of Time in the above-referenced matter. A copy has been served in accordance with the attached Certificate of Service.

If you have any questions, please feel free to contact me.

Best Regards,

STEVENS & LEE



Michael A. Gruin

Enclosure

cc: Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

---

Pennsylvania Public Utility Commission,  
Bureau of Investigation and Enforcement  
Complainant

v.

Verde Energy USA, Inc.  
Respondent

---

:  
:  
:  
:  
:  
:  
:  
:  
:  
:  
:  
:

Docket No. C-2020-3017229

**MOTION FOR EXTENSION OF TIME TO ANSWER OR RESPOND TO COMPLAINT**

Pursuant to 52 Pa. Code §§ 1.15 and 5.103 Verde Energy USA, Inc. (“Verde”) files this Motion to request a further extension of the deadline to file its Answer or other response to the Formal Complaint filed by the Bureau of Investigation & Enforcement (I&E). Verde has conferred with I&E and the Office of Consumer Advocate (“OCA”) regarding this request, and both have indicated their consent the requested extension. In support of its Motion, Verde states as follows:

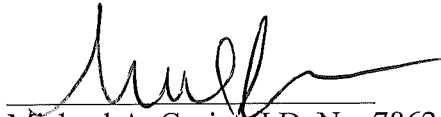
1. On January 30, 2020, Verde was served with a Formal Complaint (“Complaint”) filed by I&E, which alleged a number of violations of the regulations of the Pennsylvania Public Utility Commission (“Commission”).
2. On February 14, 2020, Verde filed an uncontested Motion for Extension of Time to Answer or Respond to the Complaint.
3. By Secretarial Letter issued on February 14, 2020, the Motion was granted and the due date for Verde’s responsive pleadings was extended to April 6, 2020.
4. On March 6, 2020, pursuant to subsection 7301(c) of the Emergency Management Services Code, 35 Pa. C.S. §§ 7101, et seq., Governor Tom Wolf issued a Proclamation

- of Disaster Emergency proclaiming the existence of a disaster emergency throughout the Commonwealth for a period of up to ninety (90) days, unless renewed by the Governor.
5. By Emergency Order issued on M-2020-3019262, the Commission confirmed that its offices are closed indefinitely and ordered that parties to proceedings before the Commission are encouraged to cooperate regarding the suspension, extension, waiver or change of any regulatory, statutory or procedural deadlines in connection with the performance of any obligation prescribed by the Public Utility Code or other applicable law.
  6. Verde has conferred with I&E regarding the Complaint and the need for additional time to provide a response, and I&E has indicated that it consents to Verde's request for an additional extension to file its response to the Complaint, until May 20, 2020.
  7. The OCA has also indicated that it has no objection to the requested extension.
  8. Verde respectfully submits that this request for an extension of time satisfies the requirements of 52 Pa. Code § 1.15 and is being made for good cause in that the period for answering the Complaint has not yet expired, no party will be prejudiced by the grant of the extension.

**REQUEST FOR RELIEF**

WHEREFORE, for all of the reasons stated herein, Verde Energy USA, Inc. respectfully requests the issuance of an Order or Secretarial Letter granting this Motion and extending the deadline for the filing of an Answer or response to the Complaint until May 20, 2020.

STEVENS & LEE

  
Michael A. Gruin, (I.D. No. 78625)  
17 N. 2<sup>nd</sup> St., 16<sup>th</sup> Fl.

Harrisburg, PA 17101  
Tel. (717) 255-7365  
Fax (610) 988-0852  
mag@stevenslee.com  
COUNSEL FOR VERDE ENERGY USA,  
INC.

DATE: March 30, 2020

