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May 15, 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.	:	Docket No. C-2020-3017229
Verde Energy USA, Inc. Respondent	:	

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 Order issued on March 19, 2020, Governor Wolf ordered the closure of all non-life sustaining businesses, and by Order issued on April 1, 2020, Governor Wolf issued a Stay at Home Order which remains in effect for most counties in Pennsylvania, including Dauphin and Cumberland Counties.
6. 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.
7. On March 30, 2020, Verde filed a further uncontested Motion for Extension of Time to Answer or Respond to the Complaint, until May 20, 2020.
8. Verde's Motion was granted by Secretary Chiavetta on March 30, 2020.
9. At this time, the Commission's offices remain closed, as are the offices for Verde's counsel.
10. 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 June 30, 2020.
11. The OCA has also indicated that it has no objection to the requested extension.
12. 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 June 30, 2020.

STEVENS & LEE



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COUNSEL FOR VERDE ENERGY USA,
INC.

DATE: May 15, 2020

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of May 2020, a copy of the enclosed Motion for Extension of Time has been served upon the person listed below via electronic mail in accordance with the requirements of 52 Pa. Code Sections 1.54 and 1.55.

Kayla Rost, Prosecutor
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Bureau of Investigation & Enforcement
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Laura J. Antinucci
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DATE: May 15, 2020

Michael A. Gruin