

**Andrew and Theresa Sabatini**

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May 21, 2020

VIA E-FILE

Rosemary Chiavetta, Esq.  
Public Utility Commission

Re: Andrew and Theresa Sabatini v. West Penn Power Company  
Docket No. C-2018-3005177

Dear Ms. Chiavetta,

Please find enclosed our Motion for Extension of Briefing Schedule in the above referenced matter.

Respectfully,

          /s/            
Andrew Sabatini

          /s/            
Theresa Sabatini

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**ANDREW AND THERESA SABATINI**

**v**

**WEST PENN POWER COMPANY**

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**Docket No. C-2018-3005177**

**Motion for Extension of Briefing Schedule**

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An evidentiary hearing in this proceeding was held on February 20, 2020. On April 9, 2020 we received Judge Watson's Interim Order to Establish a Briefing Schedule dated April 7, 2020. He set the due date for briefs to be submitted on or before May 29, 2020.

Complainant is now requesting an extension of the briefing schedule for the following reasons:

1. The only record of our hearing is the official transcript. To properly prepare the brief, we need a copy of the official transcript.
2. The right to file a brief is part of our due process, and the brief cannot be effectively drafted without access to the record.
3. Due to the worldwide Covid-19 pandemic and the Pennsylvania stay-at-home order, the PUC offices have been closed, so we have not had access to the PUC copy of the transcript.
4. Also due to the pandemic, I (Andrew) have been without work, and cannot afford to pay for my own copy of the transcript.
5. Additionally, my mother-in-law lives in our household. She is elderly and in frail health, which makes her very susceptible to the virus. By coming into Pittsburgh to the PUC offices, we could expose ourselves to Covid-19 thereby jeopardizing her health.
6. Consequently we cannot prepare our brief, which is necessary to our case, without access to the transcript. And we cannot access the transcript due to conditions beyond our control.

7. If the PUC can make their copy of the transcript accessible to us via electronic means, this would safeguard our health and that of my mother-in-law while still allowing us to prepare our brief. In that case, we request an extension of ninety (90) days from the date of transcript access.
8. If free, electronic access is not possible, we request a stay of all proceedings in this matter until such time as the virus is brought under control so that we can safely come to the PUC offices to view the transcript.

Respectfully submitted this 21<sup>st</sup> of May 2020,

          /s/            
Andrew Sabatini

          /s/            
Theresa Sabatini

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**ANDREW AND THERESA SABATINI**

**v**

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**Docket No. C-2018-3005177**

**CERTIFICATE OF SERVICE**

We hereby certify that we have this day served a true copy of this letter of complaint upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Service by email followed by a hard copy sent via First Class Mail, postage prepaid, as follows:

Tori L. Giesler  
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Administrative Law Judge Jeffrey A. Watson  
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[jeffwatson@pa.gov](mailto:jeffwatson@pa.gov)

Dated: May 21, 2020

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