

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

Re: Docket No. P-2021-3024328

Dear Secretary Chiavetta:

Enclosed please find attached:

TED UHLMAN'S MOTION
FOR EXTENSION OF TIME
FOR MAIN AND REPLY BRIEFS

Copies of this document have been served in accordance with the attached Certificate of Service.

Thank you for your attention to this matter.

Respectfully Submitted,



Ted Uhlman
2152 Sproul Rd
Broomall, PA 19008
August 19, 2021

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company for a Finding Of Necessity Pursuant to 53 P.S. § 10619 that the Situation of Two Buildings Associated with a Gas Reliability Station in Marple Township, Delaware County Is Reasonably Necessary for the Convenience and Welfare of the Public : : P-2021-3024328
DATED: August 19, 2021

**TED UHLMAN’S MOTION
FOR EXTENSION OF TIME
FOR MAIN AND REPLY BRIEFS**

Ted Uhlman hereby files this Motion for Extension of Time for Main and Reply Briefs, and sets forth as follows:

1 On August 10, 2021, ALJ DeVoe issued an INTERIM ORDER FURTHER MODIFYING BRIEFING SCHEDULE, stating, in part, that, “*Due to the court reporter’s delay in preparing the transcripts, the transcripts for the first and second day of hearing were provided to the parties on Friday, August 6, 2021, and the transcripts for the third and fourth day were provided to the parties on Monday, August 9, 2021.*” Also, that, “*After consideration of the parties’ positions, the undersigned advised the parties by email that she was extending the briefing schedule such that main briefs would be due by 10:00 a.m. on August 23, 2021 and reply briefs would be due by 10 a.m. on August 30, 2021.*”

2 On August 18, 2021, ALJ DeVoe issued an email to the active parties (and others), stating, in part, “*As for the other three days of hearing, my office cannot make these available to you until the transcripts are accepted by the Secretary’s Bureau for filing and my office receives*

hard copies of the transcripts (and has an opportunity to overnight them to our Philadelphia office). I (or someone from my office) will advise you when they are available for you to view.”

3 Paragraph 1 above indicates a fourteen day interval between arrival of the transcripts and the deadline for Main Briefs, with an additional seven days until the deadline for the Reply Briefs. Paragraph 2 above indicates that the transcripts had not yet been filed by August 18, 2021.

4 Therefore, Movant respectfully requests that the deadlines be extended, maintaining the same fourteen day interval between the issuance of the transcripts and the deadline for the Main Briefs, with an additional seven days until the deadline for the Reply Briefs.

5 Assuming that the transcripts and exhibits are available on Monday morning, August 23, 2021, Movant proposes the following modification:

DATE	EVENT
MAIN BRIEFS	Monday, September 6, 2021 @ 10:00AM
REPLY BRIEFS	Monday, September 13, 2021 @ 10:00AM

6 WHEREFORE, Movant respectfully request that ALJ DeVoe:

6.1 Grant this motion;

6.2 Extend the dates for Main and Reply Briefs to fourteen and twenty-one days AFTER issuance of the transcripts;

6.3 Extend the remainder of the litigation schedule in accordance.



Respectfully Submitted,
Ted Uhlman
2152 Sproul Rd
Broomall, PA 19008
August 19, 2021

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing

**TED UHLMAN'S MOTION
FOR EXTENSION OF TIME
FOR MAIN AND REPLY BRIEFS**

upon the parties listed below, in accordance with the requirements of 52 PA Code § 1.54 (relating to service by a participant) in the manner listed below upon the parties listed below:

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Respectfully Submitted,
Ted Uhlman
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August 19, 2021