

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company for a Finding : P-2021-3024328
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 :

**MOTION TO FILE AN AMENDED BRIEF PURSUANT TO COMPLETE ACCESS TO
EVIDENTIARY HEARING TRANSCRIPTS**

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. Having had only two partial days access to the transcripts, through circumstances beyond my control, in addition to a family medical emergency over the last few days which prevented me from compiling what I had been preparing, I offer that there is good cause for me to amend my post-hearing brief.
4. If granted this Motion, I will first review the other friendly briefs and make every effort to limit my Arguments to specific points and references that do not coincide with those already put forward by others, notwithstanding the effect of reinforcing self-evident and strong assertions.
5. I hearby ask that Your Honor grant this Motion and I do apologize for any oversight or shortcomings of me own in attending to this matter.

Respectfully submitted,

/s/

Julia M. Baker
2150 Sproul Rd.
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August 23, 2021

VERIFICATION

I, Julia M. Baker (Julie) hereby verify that the facts contained in the foregoing document are true and accurate to the best of my knowledge and that I am duly authorized to make this verification, and that I expect to be able to prove the same in any proceeding held in this matter.

_____/s/_____

Julia M. Baker
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(610) 745-8491

August 23, 2021

CERTIFICATE OF SERVICE

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

JULIA BAKER’S MOTION TO AMEND BRIEF RE:

P-2021-3024328 – 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.

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 beneath each entry, which is eService for all:

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Respectfully Submitted,

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August 23, 2021

