

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

JOINT PETITION OF	:	DOCKET NOS. P-2021-3030012,
METROPOLITAN EDISON COMPANY,	:	3030013, 3030014 and 3030021
PENNSYLVANIA ELECTRIC	:	
COMPANY, PENNSYLVANIA POWER	:	
COMPANY, AND WEST PENN POWER	:	
COMPANY, FOR APPROVAL OF	:	
THEIR DEFAULT SERVICE	:	
PROGRAMS	:	

**MOTION TO EXTEND TIME PERMITTED TO CONDUCT DISCOVERY AND
SUBMIT TESTIMONY OF JOHN BEVEC AND SUNRISE ENERGY, LLC**

AND NOW, come John Bevec and Sunrise Energy, LLC, by and through their undersigned counsel, A. Michael Gianantonio, Esquire, Robert F. Daley, Esquire and the law firm of Robert Peirce & Associates, and in accordance the Order of Presiding Administrative Law Judge Jeffery A. Watson (“Presiding ALJ”), hereby submit the following Petitioners’ Motion to Extend Time Period to Conduct Discovery and Submit Testimony, and in support thereof states as follows:

1. On December 14, 2021, Pennsylvania Electric Company, Pennsylvania Power Company, Metropolitan Edison Company, and West Penn Power Company (the “EDCs”) filed a Joint Petition for Approval of Default Service Plan (the “Joint Petition”) at the Docket Numbers identified above. The Joint Petition was filed pursuant to Section 2807(e) of the Public Utility Code.

2. On January 19, 2021, Petitioners John Bevec and Sunrise Energy, LLC timely filed their Petition to Intervene.

3. During this Court’s January 21, 2022 telephonic Prehearing Conference, the EDCs objected to Petitioners’ involvement and indicated they would be filing an Answer and New Matter to the Petition.

4. As a result, in this Court's January 26, 2022 Prehearing Order, Petitioners were not granted Intervenor status.

5. On February 8, 2022 the EDCs filed their Answer and New Matter, and Petitioners responded on February 16, 2022.

6. In the Prehearing order, this Court established a litigation schedule that was agreed upon by the parties.

7. The first deadline is approaching on February 25, 2022, which is the date when parties are required to submit their direct testimony.

8. Because Petitioners have not been granted Intervenor status, they are unable to serve discovery.


9. Petitioners believe this discovery would be vital with respect to preparing their testimony.

10. As such, should this Court grant Intervenor status, Petitioners are requesting this Honorable Court extend the deadline for Petitioners to submit direct testimony until five days after Petitioners receive a response to their discovery requests.

WHEREFORE, John Bevec and Sunrise Energy, LLC respectfully request that this Honorable Court permit Petitioners an extension to file their direct testimony.

Respectfully submitted,

ROBERT PEIRCE & ASSOCIATES P.C.

By: 
A. MICHAEL GIANANTONIO, ESQUIRE
Counsel for Petitioners John Bevec and Sunrise
Energy, LLC

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ORDER OF COURT

AND NOW, this _____ day of _____, 2022, upon consideration of Petitioners' Motion to Extend Time Period to Conduct Discovery and Submit Testimony, and after entertaining appropriate argument thereon, it is hereby ORDERED, ADJUDGED and DECREED that said Motion is GRANTED. Should this Court grant Petitioners Intervenor status, Petitioners may submit their direct testimony five days after Petitioners receive a response to their discovery requests.

By: _____
THE HONORABLE JEFFREY A. WATSON

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the participants, listed below, in accordance with the requirements of Section 1.54 (relating to service by a participant).

Via First Class, United States Mail:

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Dated: 2/23/22


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