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March 14, 2022

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

**Re: Petition of the Energy Association of Pennsylvania for an Expedited Order
Granting an Extension of Time to File Comments, Docket P-~~2021-3029018~~**

M-2021-3029018-AEL-3/15/22

Dear Secretary Chiavetta:

Attached for filing, please find the Energy Association of Pennsylvania's Petition for an Expedited Order Granting an Extension of Time to File Comments in the above docket.

Sincerely,

A handwritten signature in black ink that reads "Donna M.J. Clark".

Donna M.J. Clark
Vice President & General Counsel

Enclosure

CC: Certificate of Service

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of the Energy Association of	:	
Pennsylvania for an Expedited Order	:	Docket No. M-2021-3029018
Granting an Extension of Time to	:	
File Comments	:	

**PETITION FOR AN EXPEDITED ORDER GRANTING AN EXTENSION OF
TIME TO FILE COMMENTS TO SECRETARIAL LETTER REGARDING
THE INVESTIGATION INTO CONSERVATION SERVICE PROVIDER
AND OTHER THIRD-PARTY ACCESS TO
ELECTRIC DISTRIBUTION COMPANY CUSTOMER DATA**

NOW COMES, the Energy Association of Pennsylvania (“EAP”) acting on behalf of its electric distribution company members (“EDCs”)¹ and petitions the Pennsylvania Public Utility Commission (“PUC” or “Commission”) pursuant to 52 Pa. Code §§1.15 and 5.41 for an Expedited Order granting an Extension of Time of thirty (30) days, i.e., until May 5, 2022 for all commentators to file comments to the Commission’s February 8, 2022 Secretarial Letter related to an investigation into conservation service provider (“CSP”) and other third-party access to EDC customer data at Docket No. M-2021-3029018. In support of this petition, EAP states the following:

1. On April 16, 2019, Enerwise Global Technologies, LLC d/b/a CPower (“Enerwise”) applied to become a licensed electric generation supplier (“EGS”) within the Commonwealth of Pennsylvania (Docket No. A-2019-3009271). In this application, Enerwise stated that it would not provide electric marketing services, but rather was applying for an EGS license in order to gain access to utility data systems on behalf of its customers. Enerwise was seeking such access

¹ EAP’s EDC members include: Citizens’ Electric Company; Duquesne Light Company; Metropolitan Edison Company; PECO Energy Company; Pennsylvania Electric Company; Pennsylvania Power Company; Pike County Light & Power Company; PPL Electric Utilities; UGI Utilities Inc. – Electric Division; Wellsboro Electric Company; and West Penn Power Company.

in order to verify customer performance in demand response programs and assist its customers in analyzing electric usage.

2. The Commission entered a Tentative Order on May 21, 2021 seeking comment and reply comment from interested parties and stakeholders regarding Enerwise's application. Comments were filed by numerous interested stakeholders, including EAP's EDC members.

3. The Commission denied Enerwise's application by Final Order on October 7, 2021 declaring that a CSP is not permitted to be licensed as an EGS under the Pennsylvania Public Utility Code.

4. The Final Order directed the Commission's Office of Competitive Market Oversight, Law Bureau, and Bureau of Technical Utility Services to initiate a new proceeding to determine if a "safe, acceptable" path exists for CSPs and other third parties to gain access to EDC customer data. This new proceeding was supported by commentators to the Tentative Order.

5. Thereafter, on February 8, 2022, the Commission issued the instant Secretarial Letter at Docket No. M-2021-3029018, posing a list of questions for interested parties to address with regard to issues to be resolved in creating a potential pathway for CSP and other third-party access to EDC customer data.

6. Responses to the instant Secretarial Letter are due on April 5, 2022, i.e., forty-five (45) days following its publication on February 19, 2022 in the *Pennsylvania Bulletin*.

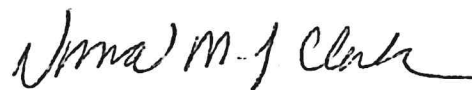
7. The Secretarial Letter included an attachment outlining issues raised during the Tentative Order comment and reply comment process, as well as additional questions posed by Commission staff. The attachment includes five (5) topic areas. Each topic comprises multiple subparts, totaling thirty-six (36) distinct questions plus the opportunity for commenters to raise

additional questions or concerns. The questions delineated in the Secretarial Letter will require both practical and legal consideration by commentators.

8. Given the complex technical, legal, and policy issues raised by the instant Secretarial Letter, EAP requests an extension of time until May 5, 2022 for all interested parties to file comments.

9. EAP believes that the extra time sought through this request will not impede the Commission's goal in thoroughly reviewing the issues regarding CSP and third-party access to customer data but in fact, will benefit all potential commentators and the Commission by eliciting a more thorough and nuanced analysis.

WHEREFORE, the Energy Association of Pennsylvania respectfully requests the Commission to issue an expedited order granting an extension of time until May 5, 2022 for all commentators to file comments to the February 8, 2022 Secretarial Letter Regarding Questions Related to the Commission's Investigation into Conservation Service Provider and Other Third-Party Access to Electric Distribution Company Customer Data, Docket No. M-2021-3029018.



Donna M.J. Clark
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Atty. ID # 39866

Date: March 14, 2022

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of the Energy Association of Pennsylvania :
for an Expedited Order Granting an Extension of : **Docket No. P-2021-3029018**
Time to File Comments : M-2021-3029018-AEL-3/15/22

CERTIFICATE OF SERVICE

I hereby certify that I have, on this day, served true and correct copies of the Petition of the Energy Association of Pennsylvania for an Expedited Order Granting an Extension of Time to File Comments in the above captioned matter upon the following persons and in accordance with the requirements of 52 Pa. Code § 1.54.

VIA ELECTRONIC MAILING

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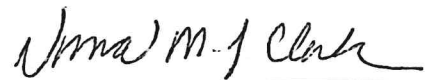
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