



PULP

PENNSYLVANIA

UTILITY LAW PROJECT

July 21, 2022

VIA E-File

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street, Filing Room
Harrisburg, PA 17120

Re: **PPL Electric Utilities Corporation's Proposed Universal Service and Energy Conservation Plan for 2023-2027; Docket No. M-2022-3031727**
Request for Extension of Comment Period

Dear Secretary Chiavetta,

On behalf of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA), we respectfully request that the period for comment in the above noted proceeding be extended an additional 30 days, to **September 22, 2022**.

Attorneys for CAUSE-PA have numerous conflicting deadlines during the existing 20-day comment period. CAUSE-PA is an active party in several large-scale proceedings before the Public Utility Commission, including multiple base rate proceedings as well as PGW's USECP proceeding, which present multiple overlapping hearing, briefing, and comment deadlines. In addition, several staff members will be away. These conflicting deadlines, combined with staffing limitations, will substantially inhibit our ability to fully review and provide comment in this critically important matter.

A brief extension of the stakeholder comment period would allow adequate time to review PPL's Plan, as further informed by the information PPL is required to file on August 3rd, and to prepare comments.

Counsel for all other active parties of record in this case, including PPL, the Office of Consumer Advocate (OCA), the Commission on Economic Opportunity (CEO), and the Coalition of Local Energy Efficiency Contractors (CLEEC), have indicated support for our request for a 30-day extension of the comment period.

We are grateful to the Commission for its consideration of our request.

Respectfully submitted,

Elizabeth R. Marx, Esq.
Counsel for CAUSE-PA

CC: Certificate of Service

Joseph Magee, Bureau of Consumer Services – jmagee@pa.gov

Nathan Froehlich, Bureau of Consumer Services – nfroehlich@pa.gov

Christina Chase-Pettis, Office of Communications – cchasepett@pa.gov

Louise Fink Smith, Law Bureau – finksmith@pa.gov

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

PPL Electric Utilities Corporation’s Proposed :
Universal Service and Energy Conservation Plan : Docket No. M-2022-3031727
for 2023-2027 :

CERTIFICATE OF SERVICE

I hereby certify that I have, on this day, served copies of the **Letter Requesting Extension of Comment Period of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania** in the above captioned matter upon the following persons and in accordance with the requirements of 52 Pa. Code § 1.54.

SERVICE VIA EMAIL ONLY

Michael J. Shafer, Esq.
Kimberly A. Klock, Esq.
PPL Electric Utilities
2 North Ninth Street
Allentown, PA 18101-1179
mjshafer@pplweb.com
kklock@pplweb.com

Richard Kanaskie, Esq.
Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
P.O. 3265
Harrisburg, PA 17105-3265
rkanaskie@pa.gov

Christy Appleby, Esq.
Darryl A. Lawrence, Esq.
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
CAppleby@paoca.org
dlawrence@paoca.org

Teresa Wagner
Office of the Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101
tereswagne@pa.gov

Joseph L. Vullo, Esquire
Burke Vullo Reilly Roberts
1460 Wyoming Avenue
Forty Fort, PA 18704
jvullo@bvrrlaw.com
Counsel for the Commission on Economic Opportunity (CEO)

John F. Povilaitis, Esquire
Alan M. Seltzer, Esquire
Buchanan Ingersoll & Rooney, PC
409 North Second Street, Suite 500
Harrisburg, PA 17101-1357
john.povilaitis@bipc.com
alan.seltzer@bipc.com
Counsel for PA Coalition of Local Energy Efficiency Contractors, Inc.

Pamela Derlinger
Solaire Energy Inc.
2358 Grover Road
Canton, PA 17724
pam@solaire-energy.com