



May 31, 2023

**VIA E-File**

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

Re: Joint Universal Service & Energy Conservation Plan of Metropolitan Edison Company,  
Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company  
for Years 2024 – 2028;  
Docket Nos. M-2022-3036532, M-2022-3036533, M-2022-3036534, M-2022-3036535

**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 submit this letter requesting a brief extension of the comment period in the above noted proceeding, due to FirstEnergy's submission of amended data.

On April 25, 2023, FirstEnergy submitted data and information responsive to the Commission's March 16 Order. On May 31, 2023, FirstEnergy filed revised data, noting an error in the calculation of data submitted on April 25. FirstEnergy's revised data amends its projections for the average monthly PCAP bills from 2024 through 2028, broken down by income tier, energy type, and EDC, using both the existing and the proposed PCAP models. (March 16 Order at 20).

To allow adequate time for parties to consider and respond to the revised data, CAUSE-PA is requesting a brief extension of the initial comment period, which is currently set to close on Monday, June 5, 2023 – leaving just three business days to analyze the new data and develop comments. Specifically, we request that the Commission extend the initial comment period to Tuesday, June 20, 2023, and in turn extend the reply comment period to July 10, 2023. This brief extension avoids conflicts with both the Juneteenth and July 4 Holiday, as well as other intervening deadlines in active proceedings before the Commission, and would provide a reasonable period of time for the parties to analyze the revised data and amend their comments and recommendations accordingly without undue delay.

Counsel for other active parties of record in this case, including FirstEnergy, the Office of Consumer Advocate (OCA), and the Coalition of Local Energy Efficiency Contractors (CLEEC), have indicated they do not object to CAUSE-PA's proposed brief extension of the comment period.

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

Respectfully Submitted,  
*Counsel for CAUSE-PA*

A handwritten signature in blue ink, appearing to read "Elizabeth R. Marx".

Elizabeth R. Marx, Esq.

CC: Certificate of Service

Joseph Magee, Bureau of Consumer Services, [jmagee@pa.gov](mailto:jmagee@pa.gov)

Jennifer Johnson, Bureau of Consumer Services, [jennifjohn@pa.gov](mailto:jennifjohn@pa.gov)

Christina Chase-Pettis, Office of Communications, [cchasepett@pa.gov](mailto:cchasepett@pa.gov)

Louise Fink Smith, Esq. Law Bureau, [finksmith@pa.gov](mailto:finksmith@pa.gov)

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Universal Service and Energy Conservation : Docket Nos. M-2022-3036532  
Plan of Metropolitan Edison Company, : M-2022-3036533  
Pennsylvania Electric Company, Pennsylvania Power : M-2022-3036534  
Company, and West Penn Power Company for Years : M-2022-3036535  
2024-2028 :

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**Certificate of Service**

I hereby certify that I have this day served copies of the letter of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA), requesting an extension of the comment period, upon the parties of record in the above captioned proceeding in accordance with the requirements of 52 Pa. Code § 1.54.

**VIA Email**

Angelina Umstead, Esq. 2800 Pottsville Pike P.O. Box 16001 Reading, Pennsylvania 19612-6001 <a href="mailto:aumstead@firstenergycorp.com">aumstead@firstenergycorp.com</a>	Christy Appleby, Esq. Darryl Lawrence, Esq. Office of Consumer Advocate 555 Walnut Street, 5 <sup>th</sup> Floor Harrisburg, PA 17101-1923 <a href="mailto:cappleby@paoca.org">cappleby@paoca.org</a> <a href="mailto:dlawrence@paoca.org">dlawrence@paoca.org</a>
NazAarah Sabree PA Office of Small Business Advocate 555 Walnut Street, 1 <sup>st</sup> Floor Forum Place Harrisburg, PA 17101 <a href="mailto:ra-sba@pa.gov">ra-sba@pa.gov</a>	Todd S. Stewart, Esq. Hawke McKeon & Sniscak LLP 100 North Tenth Street Harrisburg, PA 17101 <a href="mailto:tsstewart@hmslegal.com">tsstewart@hmslegal.com</a>
Richard Kanaskie, Esq. Bureau of Investigation & Enforcement PA Public Utility Commission P.O. Box 3265 Harrisburg, PA 17105-3265 <a href="mailto:rkanaskie@pa.gov">rkanaskie@pa.gov</a>	Joline R. Price, Esq. Robert W. Ballenger, Esq. Community Legal Services, Inc. 1424 Chestnut Street Philadelphia, PA 19102 <a href="mailto:jprice@clsphila.org">jprice@clsphila.org</a> <a href="mailto:rballenger@clsphila.org">rballenger@clsphila.org</a>

Respectfully Submitted,  
**PENNSYLVANIA UTILITY LAW PROJECT**  
*Counsel for CAUSE-PA*

A handwritten signature in blue ink that reads "Elizabeth R. Marx". The signature is fluid and cursive, with a small dot at the end.

Elizabeth R. Marx, Esq.  
118 Locust Street  
Harrisburg, PA 17101  
[pulp@putilitylawproject.org](mailto:pulp@putilitylawproject.org)

May 31, 2023