



June 15, 2023

VIA E-MAIL

The Honorable Eranda Vero
The Honorable Arlene Ashton
Office of Administrative Law Judge
Pennsylvania Public Utility Commission
801 Market Street, Suite 4063
Philadelphia, PA 19107

Re: *Pa. PUC v. Philadelphia Gas Works*, Docket No. R-2023-3037933

Dear Judge Vero and Judge Ashton:

Please find enclosed the Motion for Extension of POWER Interfaith. The parties have been served per the attached Certificate of Service. Should you have any questions, please do not hesitate to contact me. Thank you.

Sincerely,

/s/ Devin McDougall

PA Attorney ID No. 329855

Senior Attorney

Earthjustice

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(917) 628-7411

cc:

PA PUC Secretary's Bureau
Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission, et
al.

Docket No. R-2023-3037933

v.

Philadelphia Gas Works

MOTION FOR EXTENSION OF POWER INTERFAITH

June 15, 2023

Pursuant to 52 Pa. Code §§ 5.223, POWER Interfaith (“POWER”) hereby files this Motion for Extension (“Motion”) in the above-captioned proceeding (the “Proceeding”) of the Pennsylvania Public Utility Commission (the “Commission”) concerning the request for a base rate increase filed by Philadelphia Gas Works (“PGW”).

In support of this Motion, POWER states as follows:

1. POWER Interfaith (“POWER”)’s lead on this case and intended interrogatory response witness is Rabbi Julie Greenberg. POWER is a small, community-based nonprofit with limited resources and Rabbi Greenberg is essential to POWER’s engagement in this proceeding.

2. Rabbi Greenberg was in a serious bike accident on Saturday, June 10, and has been out of the office this week recovering. Rabbi Greenberg’s injuries include head injuries, the nature and scope of which are still being assessed under medical care, but she has been advised to not work and stay off screens to minimize the risk of long-term brain damage. Rabbi Greenberg is currently attempting to evaluate when she will be able to return to work.

3. PGW and POWER had previously agreed to pause all discovery deadlines, including deadlines for written objections, relating to PGW’s Set I interrogatories for POWER at least through Wednesday, June 14, with normal timelines to resume Thursday, June 15 if the parties did not agree to extend it further. The purpose of this pause was to allow time to prepare for potential settlement discussions.

4. Tuesday evening, June 13, PGW informed POWER that PGW did not intend to extend the discovery pause. POWER attempted to reach PGW by phone, but was not able to.

5. On Wednesday, June 14, POWER was able to speak with PGW to inform them of Rabbi Greenberg’s situation and to ask if PGW would agree to continue the pause of discovery deadlines while Rabbi Greenberg recovered and sought further medical consultation. POWER

stated that it did not know precisely what Rabbi Greenberg's recovery needs would be, pending further medical consultation. However, POWER stated that it would provide more information about the end date of the pause needed once it was available based on further medical consultation. PGW said they would consider the request but did not further respond on Wednesday, June 14.

6. POWER has previously voluntarily granted numerous discovery deadline extensions to PGW, including extensions of deadlines for written objections.

7. On Thursday morning, June 15, POWER, not having received a response from PGW, called PGW to follow-up. With deadlines set to resume and without further extension, written objections to PGW's Set I due today, POWER asked PGW if PGW would agree to extend discovery deadlines relating to PGW's Set I interrogatories to POWER by seven (7) calendar days until Thursday, June 22 to allow Rabbi Greenberg time for medical consultation and care, time to recover from her injuries, and for POWER to make any necessary arrangements or accommodations.

8. PGW indicated that it would consider this request but has not yet responded. POWER waited as long as practicable this morning to allow for a response from PGW before filing this Motion.

9. Pursuant to ¶ 31 of the Prehearing Order in this Proceeding, POWER respectfully submits that there is good cause to extend discovery deadlines relating to PGW's Set I interrogatories to POWER by seven (7) calendar days until Thursday, June 22 to allow Rabbi Greenberg time for medical consultation and care, time to recover from her injuries, and for POWER to make any necessary arrangements or accommodations.

Dated: June 15, 2023

Respectfully submitted,

/s/ Devin McDougall

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of this electronically-filed document upon the parties, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

<p>Lauren E. Guerra, Esq. Mackenzie C. Battle, Esq. Darryl A. Lawrence, Esq. David Evrard, Esq. Office of Consumer Advocate Forum Place, 5th Floor 555 Walnut Street Harrisburg, PA 17101-1923 dlawrence@paoca.org devrard@paoca.org lguerra@paoca.org MBattle@paoca.org</p> <p><i>Representing the Office of Consumer Advocate</i></p>	<p>Dennis A. Whitaker, Esq. Kevin J. McKeon, Esq. Todd S. Stewart, Esq. Hawke McKeon & Sniscak LLP 100 N 10th Street Harrisburg, PA 17101 dawhitaker@hmslegal.com kjmckeon@hmslegal.com tsstewart@hmslegal.com</p> <p><i>Representing Grays Ferry Cogeneration Partnership and Vicinity Energy Philadelphia, Inc.</i></p>
<p>Sharon E. Webb, Esq. Nakea S. Hurdle, Esq. Nazaarah Sabree, Esq. Office of Small Business Advocate Forum Place, 1st Floor 555 Walnut Street Harrisburg, PA 17101 swebb@pa.gov nhurdle@pa.gov ra-sba@pa.gov</p> <p><i>Representing the Office of Small Business Advocate</i></p>	<p>Craig W. Berry, Esq. Philadelphia Gas Works 800 W. Montgomery Avenue Philadelphia, PA 19122 craig.berry@pgworks.com</p> <p><i>Representing Philadelphia Gas Works</i></p>
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Dated: June 15, 2023

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