

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company for a Finding	:	P-2021-3024328
of Necessity Pursuant to 53 P.S. § 10619 that the	:	(On Remand)
Situation of Two Buildings Associated with a Gas	:	
Reliability Station in Marple Township, Delaware	:	
County Is Reasonably Necessary for the	:	
Convenience and Welfare of the Public	:	

**PETITION OF MARPLE TOWNSHIP FOR EXTENSION
OF TIME FOR SERVICE OF REMAND DIRECT AND REBUTTAL TESTIMONY**

Marple Township hereby files this Petition for Extension of Time for Written Remand Direct and Rebuttal Testimony, and sets forth as follows:

1. This matter, initiated in 2021, is now on remand from the Commonwealth Court’s March 9, 2023 Opinion and Order.
2. After a prehearing conference, a litigation schedule was set by ALJ Long’s Order dated July 5, 2023.
3. Pursuant to the July 5th Order, the parties have engaged in remand discovery.
4. Specifically, Marple Township made supplemental discovery requests to PECO dated July 11, 2023 and August 8, 2023.
5. PECO provided responses to Marple Township’s supplemental discovery requests on July 31, 2023 and August 28, 2023.
6. The information provided in PECO’s supplemental discovery responses was pertinent and necessary for Marple Township’s written expert testimony.
7. Accordingly, Marple Township is petitioning this court for a one-week extension to file remand direct testimony, making the deadline Friday September 22, 2023.

8. Additionally, Marple Township is requesting an extension for service of rebuttal testimony to Monday October 30, 2023, while all other dates in the litigation schedule remain unchanged.
9. PECO, Julia Baker and Ted Uhlman are in agreement with this request and proposed schedule change.
10. Movant proposes the following modification:

<u>Date</u>	<u>Event</u>
September 22, 2023	Written Remand Testimony
October 2, 2023	Deadline for all Written Discovery to be Propounded
October 30, 2023	Written Rebuttal Testimony
November 14-17, 2023	Technical evidentiary hearings in Philadelphia
December 15, 2023	Filing and service of main briefs
December 29, 2023	Filing and service of reply briefs

WHEREFORE, Movant respectfully requests that ALJ Long:

1. Grant this Petition; and,
2. Extend the date for written remand testimony one week; and,
3. Extend the date for written rebuttal testimony by three days, while the remainder of the litigation schedule remains unchanged, as suggested in Paragraph 10 above.

Respectfully Submitted,
 MCNICHOL, BYRNE & MATLAWSKI, P.C.

/s/ J. Adam Matlawski, Esquire

J. Adam Matlawski, Esq.
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Dated: September 14, 2023

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing, Petition for Extension of Time for Written Remand Direct and Rebuttal Testimony, in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a participant) in the manner listed below upon the parties listed below:

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Dated: September 14, 2023

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