

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission, :
Bureau of Investigation and Enforcement, : Docket No.: C-2023-3043980
Complainant :
v. :
Froman Excavating, :
Respondent :
Damage Prevention Case 016741

PETITION FOR EXTENSION OF TIME

Respondent, Froman Excavating, by and through counsel, hereby petition this Body for an extension of time to file an answer to the formal complaint served on November 1, 2023. In support of this Petition, the following is averred:

1. On November 1, 2023, the Pennsylvania Public Utility Commission Bureau of Investigation and Enforcement served a formal complaint in a Damage Prevention case on Respondent Froman Excavating.
2. Respondent Froman Excavating is investigating the underlying facts of the matter which necessitates contacting former employees to obtain facts.
3. Respondent Froman Excavating, through counsel, contacted Grant Rosul, Esquire, counsel for Complainant and requested an additional ten (10) days to respond to the Complaint.
4. Mr. Rosul has stated that he does not object to an extension of ten (10) days.
5. Respondent Froman Excavating requests that it be granted an extension of ten (10) days until December 1, 2023 to answer the Formal Complaint.

WHEREFORE, Respondent Froman Excavating respectfully requests an extension of ten (10) days to answer the Formal Complaint.

Respectfully submitted,

LAW OFFICE OF GEOFFREY R. JOHNSON, LLC

By: /s/ Geoffrey R. Johnson

Geoffrey R. Johnson (PA ID #36685)

1110 Wellington Road

Jenkintown, PA 19046

(215) 490-7436

grj@grjlawoffice.com

Attorney for Respondent Froman Excavating

CERTIFICATE OF SERVICE

I, Geoffrey R. Johnson, hereby certify that a true and correct copy of the foregoing Respondent's Petition for Extension of Time been served on the following persons via electronic filing and email:

Grant Rosul, Esquire
Prosecutor, Enforcement
Bureau of Investigation & Enforcement
Email: grosul@pa.gov

BY: /s/ Geoffrey R. Johnson
Geoffrey R. Johnson, Esquire

Dated: November 21, 2023