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Via Electronic Filing

July 29, 2024

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Re: Docket No. F-2024-3048153: Lacey Bundschuh v. PPL Electric Utilities Corporation, Constellation NewEnergy Inc., Inspire Energy Holdings LLC, Respond Power LLC

Dear Secretary Chiavetta:

In response to the June 27, 2024 Order Joining Indispensable Parties, enclosed please find Constellation NewEnergy, Inc.'s Request for Extension of Time in the above-captioned proceeding. Please accept this as my appearance pursuant to 52 Pa. Code § 1.22.

The parties shown on the attached Certificate of Service are being duly served with a copy of the enclosed Request for Extension of Time. Please do not hesitate to contact me if you have any questions or require additional information. Thank you.

Very truly yours,



Elizabeth J. Sher
Attorney No. 207853

Enclosure
cc: Service List

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of Section 1.54 (relating to service by a participant).

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Elizabeth J. Sher
Attorney No. 207853
Counsel to Constellation NewEnergy, Inc.

Dated this 29th day of July 2024

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Lacey Bundschuh v. PPL Electric
Utilities Corporation, Constellation
NewEnergy Inc., Inspire Energy
Holdings LLC, Respond Power LLC

Docket No. F-2024-3048153

**REQUEST FOR EXTENSION OF TIME OF
CONSTELLATION NEWENERGY, INC.**

NOW COMES Constellation NewEnergy, Inc. (“Constellation”) and hereby files this Request for Extension of time to answer the formal complaint filed by Lacey Bundschuh (“Complainant”), pursuant to the regulations of the Pennsylvania Public Utility Commission (“Commission”) at 52 Pa. Code § 5.15.

On June 27, 2024 the Commission issued an Order Joining Indispensable Parties in the above-captioned proceeding, joining Constellation as a respondent in this proceeding. On that same date, the Commission issued an Order Sustaining in Part, and Denying in Part, Respondent’s Preliminary Objections noting that “the parties are reminded that Commission policy promotes settlements. 52 Pa. Code § 5.231(a). The parties are encouraged to commence settlement discussions amongst themselves for this proceeding as early as possible.”

Consistent with that directive and Pennsylvania regulations, although Constellation’s internal investigation leads Constellation to believe that the enrollment was valid, Constellation has reached out to the Complainant to discuss settlement. Discussions are ongoing. Constellation anticipates that settlement discussion will successfully resolve all claims related to Constellation, however, Constellation reserves its right to respond further to the claims should settlement discussions not be successful.

To allow for time to complete the settlement discussions, **Constellation hereby requests an extension of two weeks, until August 12, to answer the formal complaint.**¹

Respectfully submitted,

/s/ Elizabeth J. Sher

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*Attorney for Constellation
NewEnergy, Inc.*

Dated: July 29, 2024

¹ See Pennsylvania Public Utility Commission Consumer Complaint Procedures Guide, available at <https://www.puc.pa.gov/media/1492/consumer-complaints-procedures-guide-2021.pdf>, at 11 (“If the company needs more time to answer your complaint, the company may file a request for extension of time to file its answer. This gives the company more time to try and fix your problem and perhaps reach a settlement of your case.”).