

Karen O. Moury  
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September 25, 2024

**Via Electronic Filing**

The Hon. Mary D. Long  
Administrative Law Judge  
Pa. Public Utility Commission  
Piatt Street, Suite 220  
301 Fifth Avenue  
Pittsburgh, PA15222  
malong@pa.gov

Re: Chelsea Page v. Duquesne Light Company and  
Reliant Energy Northeast LLC d/b/a NRG Energy, Inc.  
Docket No. C-2024-3049321

Dear Administrative Law Judge Long:

On behalf of Reliant Energy Northeast LLC d/b/a NRG Energy Inc. (“NRG”), this is to respectfully request an extension for NRG to file responsive pleadings to the Complaint, if necessary, filed by Chelsea Page. **Specifically, NRG respectfully requests a period of 20 days to file responsive pleadings, if necessary, following mediation of this matter (or at such other time as deemed appropriate).**

NRG was not originally named as a respondent in the Complaint. However, on July 30, 2024, Administrative Law Judge (“ALJ”) Mary D. Long issued an Interim Order adding NRG as an indispensable party.

On September 11, 2024, ALJ Long issued an Interim Order directing the parties to hold a resolution conference by October 9, 2024, if possible, and submit a status report by October 19, 2024. NRG plans to schedule a mediation session with Ms. Page, and encourages her to participate. Although productive settlement talks were held in late July and early August, Ms. Page has been unresponsive of late.

Given NRG’s active prior attempts to amicably resolve this matter with Ms. Page, NRG believes that a continuation of those efforts under the auspices of the PUC’s mediation program would be beneficial and may avoid the need for further litigation. Therefore, NRG supports the referral to mediation and requests that it be afforded 20 days following a completion of mediation, if necessary, to file responsive pleadings in the interest of conserving resources.

Sincerely,

*/s/ Karen O. Moury*

Karen O. Moury  
*Counsel for Reliant Energy Northeast LLC d/b/a NRG Energy, Inc.*

cc: Rosemary A. Chiavetta, Secretary (rchiavetta@pa.gov)  
Teri-Lee Rhoades, Mediator (terhoades@pa.gov)  
Cert. of Service

**CERTIFICATE OF SERVICE**

I hereby certify that this day I served a copy of the foregoing **Entry of Appearance** and **Letter Request** upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

**Via Email Only**

Chelsea Page  
521 Saint Clair Avenue  
Clairton, PA 15025  
Page.chelsea09@gmail.com

Megan E. Rulli, Esq.  
Post & Schell P.C.  
17 North Second Street, 12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
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Date: September 24, 2024

*/s/ Karen O. Moury*

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Karen O. Moury, Esquire  
Counsel for Reliant Energy Northeast LLC  
d/b/a NRG Energy, inc.