

Bryce Beard  
717.237.6041  
bbeard@eckertseamans.com

December 10, 2024

**Via Electronic Filing**

Rosemary Chiavetta, Secretary  
PA Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Re: Pennsylvania Public Utility Commission, Bureau of Investigation and Enforcement v. Philadelphia Gas Works – Docket No. C-2024-3052277

---

Dear Secretary Chiavetta:

Philadelphia Gas Works (“PGW”) requests an additional thirty (30) days to respond to the Complaint of the Bureau of Investigation and Enforcement (“I&E”) which was served on PGW on November 25, 2024, making responsive pleadings due December 16, 2024. The thirty (30) day extension would move the due date for responsive pleadings to January 15, 2025.

PGW requests the thirty (30) day extension to facilitate the review of its records and documents associated with the incident given the wide-ranging nature of the allegations and the significant time that has passed between the incident in question, the initial investigation, and the November 25, 2024, Complaint.

PGW has communicated this request to counsel for I&E and he has indicated that I&E does not oppose a thirty (30) day extension.

Sincerely,



Bryce R. Beard, Esq.

BRB/lww

cc: Colby B. Widdowson, Esq. ([cwiddowson@pa.gov](mailto:cwiddowson@pa.gov))  
Michael L. Swindler, Esq. ([mwindler@pa.gov](mailto:mwindler@pa.gov))  
Graciela Christlieb, Esq., PGW