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Nicholas A. Stobbe

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File #: 207328

December 23, 2024

***VIA ELECTRONIC FILING***

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Re: Nieves Abad v. PPL Electric Utilities Corporation**  
**Docket No. C-2024-3047163**

Dear Secretary Chiavetta:

Attached for filing is the Petition of PPL Electric Utilities Corporation Requesting for Extension of Time to Answer the Motion to Compel Discovery of Nieves Abad in the above-referenced proceeding.

Copies will be provided as indicated on the Certificate of Service.

Respectfully,



Nicholas A. Stobbe

NAS/dmc  
Attachments

cc: Honorable Alphonso Arnold III  
Certificate of Service

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

**VIA EMAIL AND FIRST-CLASS MAIL**

Nieves Abad  
747 Delaware Street  
Forest City, PA 18421  
[Martjua3@aol.com](mailto:Martjua3@aol.com)

Date: December 23, 2024



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Nicholas A. Stobbe

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Nieves Abad,

Complainant,

v.

PPL Electric Utilities Corporation,

Respondent.

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Docket No. C-2024-3047163

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**PETITION FOR EXTENSION OF TIME OF  
PPL ELECTRIC UTILITIES CORPORATION**

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AND NOW COMES PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) and hereby files this Petition for Extension of Time to Answer the Motion to Compel Discovery (“Motion”) Complaint filed by Nieves Abad (“Complainant”), which was served on the Company on December 17, 2024.<sup>1</sup> This Petition is made pursuant to the Pennsylvania Public Utility Commission’s (“Commission”) regulations at 52 Pa. Code § 1.15(a).

The Company respectfully requests this extension of time to file an Answer to the Motion of the Complainant due to the primary attorney handling this proceeding having preplanned vacation arrangements cutting into PPL Electric’s time to serve its Answer to the Complainant’s Motion. PPL Electric respectfully requests that the Commission grant the Company a ten (10) day extension to file an Answer to the Motion to accommodate vacation arrangements and the holiday season.

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<sup>1</sup> The Complainant served his Motion on December 16, 2024, at 4:36 p.m. thus, it is deemed to have been served the following business day, *i.e.*, December 17, 2024. See 52 Pa. Code § 1.56(a)(5).

WHEREFORE, to accommodate preplanned vacations and the holiday season, PPL Electric Utilities Corporation hereby requests an extension of ten (10) days, **until January 2, 2025**, to answer the Complainant's Motion to Compel. PPL Electric has endeavored to contact the Complainant to discuss this request, however, is unaware of the Complainant's stance on the same at this time.

Respectfully submitted,



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Michael J. Shafer (ID # 205681)  
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Date: December 23, 2024

Attorneys for PPL Electric Utilities Corporation