

LARRY R. CRAYNE, PC
Attorney at Law

238 Johnston Road
Pittsburgh, PA 15241

lrcrayne@comcast.net

(412) 831-5462
(412) 425-4029

January 13, 2024

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

Re: Joe Leahey v. Columbia Gas of Pennsylvania, Inc.
Complaint Docket No. C-2024-3051984

Dear Ms. Chiavetta:

Enclosed please find a Motion for Leave to File Answer *Nunc Pro Tunc* to the subject Formal Complaint.

Sincerely,



Larry R. Crayne

Enclosure: Motion

cc: Joe Leahey, VP
Navitus, LLC
122 Leahey Drive
Bellefonte, PA 16823

Commonwealth of Pennsylvania

Before the Pennsylvania Public Utility Commission

In the Matter of:

Joe Leahey,
Complainant,

Complaint Docket
No. C-2024-3051984

VS.

Columbia Gas of Pennsylvania, Inc.,
Respondent.

Motion for Leave to File Answer *Nunc Pro Tunc*

AND NOW comes Respondent, Columbia Gas of Pennsylvania, Inc., (Columbia), and requests that the Commission grant Columbia leave to submit an answer *Nunc Pro Tunc* in the above-captioned matter and thereby deem that the Answer filed with this Motion to have been timely filed. The Commission's records indicate that a copy of this Complaint was served on Columbia on or about November 6, 2024. An answer to the Complaint was due to be filed no later than November 26, 2024. Apparently, the service copy of this Complaint became misdirected. Since an answer to this Complaint is being tendered with this Motion, there does not appear to be a potential for significant delay in the administration of this Complaint. Therefore, there is no detriment to Complainant by reason of the short delay in the filing of this Answer.

Wherefore, Columbia respectfully requests that the Commission grant this Motion to allow Columbia to file this Answer *Nunc Pro Tunc* and accept the Answer as timely filed.

Respectfully submitted,

Columbia Gas of Pennsylvania, Inc.,

By: 
Larry R. Crayne, Esq.

Certificate of Service

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the participant, listed below, in accordance with the requirements of Sec. 1.54 (relating to service by a participant).

Joe Leahey, VP
Navitus, LLC
122 Leahey Drive
Bellefonte, PA 16823
jleahey@mccrossin.com

Dated this 13th day of JAN, 2025



Larry R. Crayne
238 Johnston Road
Pittsburgh, PA 15241

Counsel for
Columbia Gas of Pennsylvania, Inc.