

COMMONWEALTH OF PENNSYLVANIA



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April 17, 2025

Via Electronic Filing

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

Re: Phase V of Act 129
M-2025-3052826

Dear Secretary Chiavetta:

Attached for electronic filing please find the Office of Consumer Advocate's Unopposed Motion for Extension of Time for Reply Comments, in the above-referenced proceeding.

Copies have been served on the parties as indicated on the enclosed Certificate of Service.

Respectfully submitted,

/s/ Katherine M. Kennedy
Katherine M. Kennedy
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Enclosures

cc: Certificate of Service
Joseph Sherrick, Bureau of Technical Utility Services, josherrick@pa.gov
Tiffany Tran, Law Bureau, tiffran@pa.gov

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Act 129 Energy Efficiency and Conservation : Docket No. M-2025-3052826
Program Implementation Phase V :

UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE REPLY COMMENTS

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Dated: April 17, 2025

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Act 129 Energy Efficiency and Conservation : Docket No. M-2025-3052826
Program Implementation Phase V :

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE REPLY COMMENTS**

Pursuant to 52 Pa. Code Sections 1.15 and 5.103, the Office of Consumer Advocate (OCA) files the within Motion to request a five-day extension of the deadline to file its Reply Comments on the above-referenced captioned case and avers as follows:

1. On January 21, 2025, the Commission issued a Secretarial Letter regarding the Act 129 Statewide Evaluator Energy (SWE) Efficiency & Peak Demand Reduction and Demand Response Market Potential Studies (EEPDR), which announced a stakeholder on Wednesday, January 29, 2025, from 10:00 A.M. to 3:30 P.M. in Hearing Room 1 of the Commonwealth Keystone Building, 400 North Street, Harrisburg, Pennsylvania, 17120.

2. On January 29, 2025, the undersigned attended the stakeholder meeting in its entirety, whereby the Commission also announced the publication of the Phase V Tentative Implementation Order (T.O.) to take place on or about February 20, 2025.

3. On or about March 8, 2025, the Commission published the T.O. in the *Pennsylvania Bulletin*, which contained the schedule below for this matter on page 64, setting forth a due date of April 7, 2025 for Comments, and April 22, 2025 for Reply Comments.

4. The OCA filed its Comments on April 7, 2025.

5. By April 8, 2025, approximately twenty-two Comments were e-filed and available on the online docket for this matter, inclusive of the OCA's comments.

6. The Comments offered on this matter are voluminous, thoughtful, and deep in breadth, covering a variety of issues, and offering a complex scope of remedies.

7. In light of the complex scope of the remedies offered contained within the Comments and breadth of issues raised therein, the OCA has determined that it will require additional time to thoroughly investigate and reply to the Comments docketed to date.

8. The OCA has retained two experts to provide assistance and guidance in preparation of these Reply Comments.

9. In light of the complexity and breadth of comments submitted in this docket and the intervening major holidays¹ between the Comment and Reply Comment due dates, the OCA requests a five-day extension of time to file Reply Comments to allow for its retained experts and all parties to more thoroughly review the Comments filed to date.

10. The OCA has conferred with following commenters that submitted comments in this proceeding: Advanced Energy United (United); Coalition for Affordable Utility Service and Energy Efficiency in Pennsylvania (CAUSE-PA) and the Tenant Union Representative Network (TURN) (collectively referred to as “Low Income Advocates”); Philadelphia Solar Energy Association, Pennsylvania Solar Center, Pennsylvania Solar and Storage Industries Association, Evergreen Action (collectively referred to as “Clean Energy Advocates”); ACTION Housing, Inc., the Housing Alliance of Pennsylvania, National Housing Trust, New Ecology, Inc., the Pennsylvania Utility Law Project, and Regional Housing Legal Services (collectively referred to as “Coalition of Equitable Energy and Housing in PA” (CEEH-PA)); Commission on Economic Opportunity and Pennsylvania Weatherization Providers Task Force (CEO and the Task Force); Duquesne Light Company (DLC); Energy Association of Pennsylvania (EAP); Building

¹ Passover and Easter.

Decarbonization Coalition, Celentano Energy Services, Center for Coalfield Justice, Clean Air Council, Conservation Voters of PA, Energy Efficiency Alliance, Green Building United, Jewish Earth Alliance-PA, Natural Resources Defense Council, PA Solar & Storage Industries Association, PennEnvironment, Pennsylvania Interfaith Power and Light, Pennsylvania Solar Center, Pennsylvania Sustainable Business Network, Pennsylvania Utility Law Project, POWER Interfaith, Physicians for Social Responsibility Pennsylvania, Sierra Club Pennsylvania Chapter, Vote Solar (collectively referred to as “Energy Advocates”); FirstEnergy Pennsylvania Electric Company (FirstEnergy); Office of the Small Business Advocate (OSBA); Industrial Energy Consumers of Pennsylvania (IECPA); Keystone Energy Efficiency Alliance (KEEA); Northeast Energy Efficiency Partnerships (NEEP); NRG Energy, Inc.; Oracle; Pennsylvania Department of Environmental Protection (DEP); PECO Energy Company (PECO); PPL Electric Utilities Corporation (PPL²); RMI; UGI Utilities Inc. – Gas Division and Electric Division; and Uplight.

11. Low Income Advocates, Clean Energy Advocates, CEEH-PA, CEO and Task Force, DLC, EAP, First Energy, IECPA, KEEA, NEEP, NRG, OSBA, Oracle, PECO, RMI, UGI Utilities Inc., United and Uplight are not opposed to the OCA’s request for a five-day extension to file its Reply Comments on this matter by 4:30pm on April 28, 2025.

12. The OCA respectfully requests and avers that the Commission grant this modest request for extension without further or additional amendment of the Phase V timeline and schedule, as the OCA acknowledges that the current schedule is already constricted and solidified.

13. The OCA respectfully submits that this request for an extension of time satisfies the requirements of 52 Pa Code Section 1.15 and is being made for good cause in the period of furnishing Reply Comments has not yet expired, no party will be prejudiced by the grant of the

² PPL does not take a position on this instant motion.

extension, and an extension of time will allow for more thorough and detailed review of the Reply Comments to date, and will provide time for the parties to more thoroughly respond thereto.

WHEREFORE, for all of the reasons stated herein, the OCA respectfully requests the issuance of an Order of Secretarial Letter granting this motion and extending the deadline for filing of all parties' comments to no later than 4:30 p.m. on April 28, 2025.

Respectfully Submitted,

/s/ Katie Kennedy
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Dated: April 17, 2025

CERTIFICATE OF SERVICE

Act 129 Energy Efficiency and Conservation Program Implementation Phase V : : Docket No. M-2025-3052826 : : :

I hereby certify that I have this day filed electronically on the Commission’s electronic filing system and served a true copy of the following document, the Office of Consumer Advocate’s Unopposed Motion for Extension of Time to File Reply Comments upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below.

Dated this 17th day of April, 2025

SERVICE BY E-MAIL ONLY

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Dated: April 17, 2025

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