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June 16, 2026

VIA ELECTRONIC FILING

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Rulemaking to Further Amend the Provisions of 52 Pa. Code Chapter 56 /Docket No. L-2025-3058767

Dear Secretary Homsher:

The Energy Association of Pennsylvania (“EAP”)¹ files this letter to clarify EAP’s understanding of, and non-opposition to, the June 5, 2026 *Joint Request for Extension of Public Comment Period*, filed by the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”) and the Tenant Union Representation Network (“TURN”) (“Joint Request”). EAP deems this clarification necessary in light of the June 12, 2026 extension request filed by the Office of Small Business Advocate (“OSBA”) (“OSBA Request”), which conflicts with the reply comment date sought in the Joint Request.

The Commission’s Notice of Proposed Rulemaking Order (“NOPR”), dated February 19, 2026, and published in the Pennsylvania Bulletin on May 30, 2026, provided for 60 days for comments and 90 days for reply comments from the date of publication of the NOPR - resulting in comments to be filed by July 29, 2026 and reply comments by August 28, 2026. This would

¹ EAP is a trade association whose members include: Citizens' Electric Company; Columbia Gas of Pennsylvania, Inc.; Duquesne Light Company; FirstEnergy Pennsylvania Electric Company; Leatherstocking Gas Company, LLC; National Fuel Gas Distribution Corp.; Pike County Light & Power Company; PECO Energy Company; Peoples Natural Gas Company LLC; Philadelphia Gas Works; PPL Electric Utilities Corporation; UGI Utilities, Inc.; Valley Energy, Inc.; and Wellsboro Electric Company.

have provided a full thirty (30) days for development of reply comments from the comment deadline.

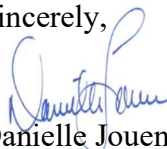
The Joint Request sought extensions for the comment and reply comment dates – August 27, 2026 and October 12, 2026, respectively. The intent of the Joint Request was to seek an extension of 30 days for comments, with reply comments due 45 days *after* comments, rather than the original 30 days per the NOPR. Per discussion with counsel for CAUSE-PA, the requested August 27, 2026 comment date should have been stated as August 28, 2026.

The OSBA Request correctly notes the extended comment date should be August 28, 2026. However, though the OSBA Request supports the Joint Request, it seeks a reply comment date of September 17, 2026, which significantly differs from the October 12, 2026 Joint Request reply comment date. If granted, the OSBA request would *shorten* the reply comment period with respect to the comment deadline by providing only twenty (20) days for development of reply comments after the comment deadline, rather than the thirty (30) provided by the NOPR.

EAP submits that the reply deadline of October 12, 2026 in the Joint Request is reasonable given the extensive comments anticipated at this docket and that no parties would be served by shortening the reply comment period. EAP represents that CAUSE-PA, TURN, the Office of Consumer Advocate, and Pittsburgh Water support this clarification of comment and reply comment deadlines. EAP was also able to confirm with OSBA that the shortened reply date in the OSBA Request was unintended. EAP is authorized to represent that OSBA supports EAP's clarification. In summary, we ask for an extension of deadlines as follows:

Comments: August 28, 2026
Reply Comments: October 12, 2026

Sincerely,



Danielle Jouenne

Vice President and General Counsel

Enclosure

cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Rulemaking to Further Amend :
the Provision of 52 Pa. Code : **Docket No. L-2025-3058767**
Chapter 56 :

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served via email (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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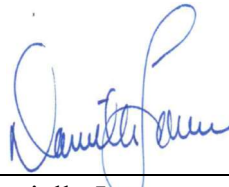
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Date: June 16, 2026



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