



Fox Rothschild LLP
ATTORNEYS AT LAW

2000 Market Street, 20th Floor
Philadelphia, PA 19103-3222
Tel 215.299.2000 Fax 215.299.2150
www.foxrothschild.com

Philip L. Hinerman
Direct Dial: (215) 299-2066
Email Address: phinerman@foxrothschild.com

RECEIVED

MAR 24 2010

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

March 24, 2010

VIA FEDERAL EXPRESS
James McNulty, Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: PA Public Utility Commission v. Philadelphia Gas Works
Docket Nos. R-2009-21398884 and P-2009-2097639

Dear Secretary McNulty:

On behalf of Philadelphia Housing Authority ("PHA"), enclosed for filing please find an original and three copies of its Motion for Extension of Time to File Direct Testimony. Copies have been served in accordance with the attached Certificate of Service.

Respectfully submitted,

Philip L. Hinerman

PLH:mn
Enclosure

cc: Certificate of Service (w/encl.)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC UTILITY
COMMISSION

v.

PHILADELPHIA GAS WORKS

Docket No. R-2009-2139884
P-2009-2097639

**ORDER GRANTING MOTION
OF PHILADELPHIA HOUSING
AUTHORITY FOR EXTENSION
OF TIME TO FILE
DIRECT TESTIMONY**

This matter, having been brought before the Pennsylvania Public Utility Commission (the "Commission") on a Motion filed by Philip L. Hinerman, Esquire of Fox Rothschild LLP, attorney for Philadelphia Housing Authority ("PHA"), for an extension of time to file direct testimony, and the Commission having considered the papers filed and the arguments made by counsel if any,

It is, on this _____ day of _____, 2010

ORDERED AND ADJUDGED as follows:

1. The Motion of PHA for an extension of time to file direct testimony is hereby GRANTED.
2. Direct testimony on behalf of PHA in the above-captioned matter is due on or before Thursday, April 1, 2010.

Charles E. Rainey, Jr., A.L.J.

- Motion Opposed
 Motion Unopposed

RECEIVED

MAR 24 2010

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC UTILITY
COMMISSION

v.

PHILADELPHIA GAS WORKS

Docket No. R-2009-2139884
P-2009-2097639

**MOTION OF PHILADELPHIA
HOUSING AUTHORITY FOR
EXTENSION OF TIME TO FILE
DIRECT TESTIMONY**

MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S BRIEF

Philadelphia Housing Authority ("PHA"), submits this motion requesting an extension of time to file its direct testimony on the above-captioned matter until April 1, 2010. In specific support of this motion, PHA states as follows:

1. The Pennsylvania Public Utility Commission (the "PUC") set a procedural schedule in this matter on March 2, 2010 (the "Order"). Pursuant to the Order, direct testimony of all parties is due on March 26, 2010.

2. Counsel for PHA seeks an extension of time to file its direct testimony because PHA only recently received responses to some of its interrogatories (on March 19, 2010), and because PHA is currently in discussions with PGW regarding a dispute as to four of its interrogatories.

3. As a result, PHA does not have all of the relevant information it requires for its direct testimony, and has filed a motion to compel responses to its discovery requests with the PUC.

RECEIVED

MAR 24 2010

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

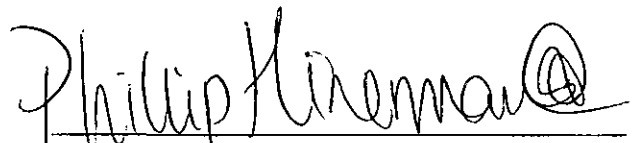
4. Accordingly, PHA requests a one week extension (until April 1, 2010) to allow adequate time to review the recently-served discovery responses and to resolve the current discovery dispute before preparing and submitting its direct testimony.

5. Counsel for all parties have been contacted with regard to the present motion, and no objections to PHA's request for an extension of time have been received.

6. PHA does not intend to offer direct testimony as to the appropriateness of rate increases or decreases.

WHEREFORE, Philadelphia Housing Authority respectfully requests the Commission grant it an extension of seven (7) days from the Commission's Order to file its direct testimony, until April 1, 2010, so as to allow adequate time to review the recently-served discovery responses, resolve the current discovery dispute, and prepare direct testimony.

Respectfully submitted,



Philip L. Hinerman, Esquire
FOX ROTHSCHILD LLP
Attorneys for Philadelphia Housing Authority

Dated: March 24, 2010

RECEIVED

MAR 24 2010

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

CERTIFICATE OF SERVICE

I hereby certify that on this date, a true and correct copy of the Motion of Philadelphia Housing Authority ("PHA") to dismiss the Objections of Philadelphia Gas Works ("PGW") to PHA's first set of Interrogatories ("Discovery Requests") and Compel PGW's Responses to all outstanding Discovery Requests of PHA, dated March 24, 2010, has been served upon the participants below in accordance with the requirements of § 1.54 (relating to service by a participant):

VIA FEDERAL EXPRESS

Honorable Charles E. Rainey, Jr.
Office of Administrative Law Judge
Philadelphia District Office
Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
801 Market Street
Philadelphia, PA 19107

RECEIVED

MAR 24 2010

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

VIA E-MAIL AND/OR FIRST CLASS MAIL

Daniel Clearfield, Esq.
Kevin J, Moody, Esq.
Eckert Seamans Cherin & Mellot LLC
213 Market Street – 8th Floor
Harrisburg, PA 17101
dclearfield@eckertseamans.com

Bohdan Pankiw
Law Bureau
PA Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

Johnnie Simms, Esq.
Richard A. Kanaskie
Adeolu Bakare, Esq.
Office of Trial Staff
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265
E-mail: josimms@state.pa.us
rkanaskie@state.pa.us
abakarie@state.pa.us

Philip Bertocci, Esq.
Thu Tran, Esq.
Community Legal Services
1424 Chestnut Street
Philadelphia, PA 19102
Fax: (215) 981-0434
E-mail: pbertocci@clsphila.org
ttran@clsphila.org

William R. Lloyd, Jr., Esq.
Sharon Webb, Esq.
Lauren Lepkowski, Esq.
Office of Small Business Advocate
Commerce Building, Suite I102
300 North 2nd Street
Harrisburg, PA 17101
E-mail: willoid@state.pa.us
swebb@state.pa.us
lepkoski@state.pa.us

Charis Mincavage, Esq.
Barry Naum, Esq.
Saad A Syed, Esq.
McNees Wallace Nurick
100 Pine Street
PO Box 1166
Harrisburg, PA 17108-1166
Email: cmincavage@mwn.com
bnaum@mwn.com

Darryl Lawrence, Esq.
Jennedy S. Johnson, Esq.
Jessica Horner, Esq.
Christy M. Appleby
Office of Consumer Advocate
5th Floor, Forum Place Bldg.
555 Walnut Street
Harrisburg, PA 17101-1921
E-mail: dlawrence@paoca.org
ijohnson@paoca.org
jhorner@paoca.org

Paul R. Bonney
Peco Energy Company
2301 Market Street
PO Box 8699
Philadelphia, PA 19101-8699

Todd Stewart, Esq.
Hawke McKeon Sniscak & Kennard, LLP
PO Box 1778
Harrisburg, PA 17105
Email: TSSStewart@hmslegal.com

Roger D. Colton
Fisher, Sheehan & Colton
34 Warwick Road
Belmont, MA 02478

Michael Bleiweis
243 Banks Road
Easton, CT 06612

James Shuskis
Fixed Utility Financial Analyst III
Bureau of Fixed Utility Services
PA Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

Adam H. Cutler, Esq.
Public Interest Law Center of
Philadelphia
1709 Benjamin Franklin Parkway
Second Floor
Philadelphia, PA 19103

Gregory Stunder, Esq.
Abby Pozefsky
Philadelphia Gas Works
800 W. Montgomery Ave
Philadelphia, PA 19122
Greg.stunder@pgworks.com

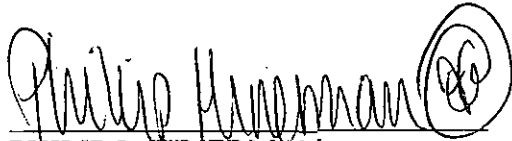
Cheryl Walker Davis, Director
Office of Special Assistants
Third Floor East,
Commonwealth Keystone Bldg.
PO Box 3265
Harrisburg, PA 17105-3265
cwalkerdav@state.pa.us

Thomas Caitlin
Exeter Associates, Inc.
Suite 310
5565 Sterrett Place
Columbia, MD 21044

Robert Knecht
Industrial Economic Incorporated
2067 Massachusetts Ave.
Cambridge, MA 02140

John Matchik
Fixed Utility Valuation Engineer III
Bureau of Fixed Utility Services
PA Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

Charles Covage
Utility Energy Conservation Analyst
Bureau of Conservation Energy &
Economic Planning
PA Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265



PHILIP L. HINERMAN

Dated: March _____, 2010

RECEIVED

MAR 24 2010

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

From: Origin ID: REDA (215)299-2000
Philip L. Hinerman
FoxRothschild
2000 Market Street



Philadelphia, PA 19103

Ship Date: 24MAR10
ActWgt: 1 LB
CAD: 5193122/WBUS0200

Delivery Address Bar Code



Ref # 067152.00030-0555
Invoice #
PO #
Dept #

SHIP TO: (215)299-2066

BILL SENDER

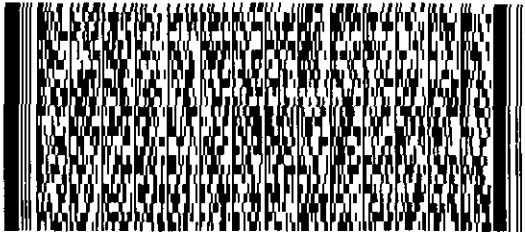
James J. McNulty, Secretary
Comm. of PA, Public Utilities Comm.
400 North St

Harrisburg, PA 171200211

THU - 25MAR A1

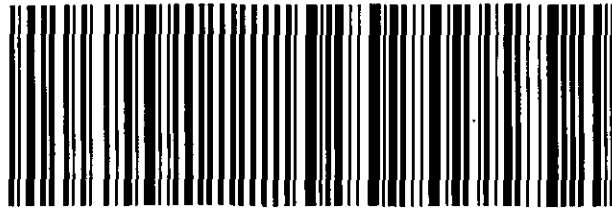
PRIORITY OVERNIGHT

TRK# 7921 7927 8558
(0201)



ZN MDTA

17120
PA-US
MDT



FOLD on this line and place in shipping pouch with bar code and delivery address visible

1. Fold the first printed page in half and use as the shipping label.
2. Place the label in a waybill pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.
3. Keep the second page as a receipt for your records. The receipt contains the terms and conditions of shipping and information useful for tracking your package.