


COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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December 28, 2020

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

Re: Policy Proceeding – Utilization of Storage
Resources as Electric Distribution Assets
Docket No. M-2020-3022877

Dear Secretary Chiavetta:

Attached for electronic filing please find the Motion of the Office of Consumer Advocate for an Extension of Time for Comments in the above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,

/s/ Phillip D. Demanchick
Phillip D. Demanchick
Assistant Consumer Advocate
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Enclosures:

cc: Office of Administrative Law Judge (**email only**)
Office of Special Assistants (**email only**: ra-OSA@pa.gov)
Aspassia Staevska, Law Bureau (**email only**)
Joe Cardinale, Law Bureau (**email only**)
Eric Matheson, Office of the Executive Director (**email only**)
David Edinger, Bureau of Technical Utility Services (**email only**)
Certificate of Service

*301418

CERTIFICATE OF SERVICE

Re: Policy Proceeding – Utilization of :
Storage Resources as Electric : Docket No. M-2020-3022877
Distribution Assets :

I hereby certify that I have this day served a true copy of the following document, the Motion of the Office of Consumer Advocate for an Extension of Time for 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 28th day of December 2020.

SERVICE BY E-MAIL ONLY

Richard A. Kanaskie, Esquire
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Pennsylvania Public Utility Commission
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Dated: December 28, 2020
*301426

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Policy Proceeding—Utilization of Storage : Docket No. M-2020-3022877
Resources as Electric Distribution Assets :

MOTION OF THE OFFICE OF CONSUMER ADVOCATE
FOR AN EXTENSION OF TIME FOR COMMENTS

Pursuant to Sections 1.15 and 5.103 of the Pennsylvania Public Utility Commission's (Commission) regulations, 52 Pa. Code Sections 1.15, 5.103, the Office of Consumer Advocate (OCA) hereby files this Motion for an Extension of Time for Comments (Motion) in the above-captioned proceeding. Through this Motion, the OCA respectfully requests that the Commission extend the deadline for the filing of Comments for a period of thirty (30) days, from January 19, 2021 to February 18, 2021. In support of this Motion, the OCA provides the following:

1. On December 3, 2020, a Secretarial Letter was issued on behalf of the Commission seeking comments from utilities and other stakeholders on potential future regulatory policies related to the utilization of electric storage within electric utility distribution planning. The Secretarial Letter invited interested parties to submit written comments for the Commission's consideration within 30 days of publication in the Pennsylvania Bulletin. The Secretarial Letter was docketed at Docket No. M-2020-3022877.

2. On Saturday, December 19, 2020, the Secretarial Letter was published in the Pennsylvania Bulletin. Accordingly, the due date for Comments is Tuesday, January 19, 2021.

3. The OCA respectfully requests that the Commission extend the due date for Comments by an additional period of 30 days, from January 19, 2021, to Thursday, February 18, 2021.

4. Utilization of electric storage assets is an important issue that presents many complex and novel policy issues. As such, it is critical that the OCA and other interested parties be provided the necessary time to properly address this topic and provide the Commission a sufficient record for its consideration.

5. The current deadline of January 19, 2021, however, will make it difficult for the OCA to accomplish this goal and to address the complexity, depth, and number of issues raised by the Secretarial Letter. The existing deadline is also challenging to meet due to the timing of the holidays, as well as the other obligations and commitments of the OCA in other Commission proceedings.

6. The OCA has notified the Commission's Bureau of Investigation and Enforcement (I&E), the Office of Small Business Advocate (OSBA), the Energy Association of Pennsylvania (EAP), the Industrials, Natural Resources Defense Council (NRDC) and Earthjustice of this request. All have indicated support for a 30-day extension of time in this matter.

WHEREFORE, the Office of Consumer Advocate respectfully requests that the Commission extend the deadline for the filing of Comments by a period of thirty (30) days, from Tuesday, January 19, 2021, to Thursday, February 18, 2021. The OCA appreciates the Commission's consideration of this request.

Respectfully submitted,

/s/Phillip D. Demanchick

Phillip D. Demanchick

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Dated: December 28, 2020
301330

Counsel for:

Tanya J. McCloskey

Acting Consumer Advocate