

Jack R. Garfinkle
Associate General Counsel
2301 Market Street / S23-1
Philadelphia, PA 19103

Direct Dial: 215-841-4608
Email: Jack.Garfinkle@exeloncorp.com

January 13, 2021

VIA eFILING

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

**Re: Petition of PECO Energy Company for Approval of Its
Act 129 Phase IV Energy Efficiency and Conservation Plan
Docket No. M-2020-3020830**

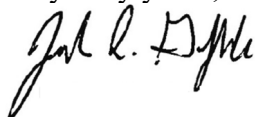
Dear Secretary Chiavetta:

Enclosed for filing is **PECO Energy Company's Response to the Joint Expedited Motion for Extension of Procedural Schedule and OALJ's Proposed Revised Schedule** (the "Response"), in the above-captioned matter.

As evidenced by the Certificate of Service, copies of the Response have been served upon Chief Administrative Law Judge Charles Rainey, Deputy Chief Administrative Law Judge Mark A. Hoyer, Administrative Law Judge Emily DeVoe, and all parties of record.

If you have any questions regarding this filing, please do not hesitate to contact me at 215.841.4608.

Very truly yours,



Jack R. Garfinkle

Enclosures

c: Per the Certificate of Service (w/encls.)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PETITION OF PECO ENERGY :
COMPANY FOR APPROVAL OF ITS :
ACT 129 PHASE IV ENERGY : **Docket No. M-2020-3020830**
EFFICIENCY AND CONSERVATION :
PLAN :

CERTIFICATE OF SERVICE

I hereby certify that I have this date served true and correct copies of **PECO Energy Company's Response to the Joint Expedited Motion for Extension of Procedural Schedule and OALJ's Proposed Revised Schedule** on the following individuals in the matter specified in accordance with the requirements of 52 Pa. Code § 1.54:

VIA ELECTRONIC MAIL

The Honorable Charles Rainey
Chief Administrative Law Judge
Pennsylvania Public Utility Commission
400 North Street, 2nd Floor West
Commonwealth Keystone Building
Harrisburg, PA 17120
crainey@pa.gov

The Honorable Mark A. Hoyer
Deputy Chief Administrative Law Judge
Pennsylvania Public Utility Commission
Piatt Place – Suite 220
301 Fifth Avenue
Pittsburgh, PA 15222
mhoyer@pa.gov

The Honorable Emily DeVoe
Administrative Law Judge
Pennsylvania Public Utility Commission
Piatt Place – Suite 220
301 Fifth Avenue
Pittsburgh, PA 15222
edevoe@pa.gov

Steven C. Gray
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101
sgray@pa.gov

Laura J. Antinucci
Aron J. Beatty
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
lantinucci@paoca.org
abeatty@paoca.org

Charis Mincavage
Adeolu A. Bakare
Jo-Anne Thompson
McNees Wallace & Nurick LLC
100 Pine Street - P.O. Box 1166
Harrisburg, PA 17108-1166
cmincavage@mcneeslaw.com
abakare@mcneeslaw.com
jthompson@mcneeslaw.com
Counsel for PAIEUG

Elizabeth R. Marx
John W. Sweet
Ria Pereira
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
pulp@palegalaid.net
Counsel for CAUSE-PA

James M. Van Nostrand
Keyes & Fox LLP
320 Fort Duquesne Boulevard, Suite 15K
Pittsburgh, PA 15222
jvannostrand@keyesfox.com
Counsel for NRDC

Mark C. Szybist
1152 15th Street, NW
Suite 300
Washington, DC 20005-1723
mszybist@nrdc.org
Counsel for NRDC

Kintésia S. Scott
Josie B.H. Pickens
Joline R. Price
Robert W. Ballenger
Community Legal Services, Inc.
1424 Chestnut Street
Philadelphia, PA 19102
kscott@clsphila.org
jpickens@clsphila.org
jprice@clsphila.org
rballenger@clsphila.org
Counsel for TURN

Derrick Price Williamson
Barry A. Naum
Spilman Thomas & Battle, PLLC
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050
dwilliamson@spilmanlaw.com
bnaum@spilmanlaw.com
Counsel for IECPA



Kenneth M. Kulak (Pa. No. 75509)
Catherine G. Vasudevan (Pa. No. 210254)
Morgan, Lewis & Bockius LLP
1701 Market Street
Philadelphia, PA 19103-2921
215.963.5384 (office)
215.963.5001 (fax)
ken.kulak@morganlewis.com
catherine.vasudevan@morganlewis.com

Counsel for PECO Energy Company

Dated: January 13, 2021

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PETITION OF PECO ENERGY :
COMPANY FOR APPROVAL OF ITS :
ACT 129 PHASE IV ENERGY : **DOCKET NO. M-2020-3020830**
EFFICIENCY AND CONSERVATION :
PLAN :

**PECO ENERGY COMPANY’S RESPONSE TO THE JOINT EXPEDITED MOTION
FOR EXTENSION OF PROCEDURAL SCHEDULE AND OALJ’S PROPOSED
REVISED SCHEDULE**

PECO Energy Company (“PECO” or the “Company”) hereby responds to the Joint Expedited Motion for Extension of Procedural Schedule filed by the Joint Movants (“Joint Motion”),¹ and the Interim Order Directing Parties to Respond to Joint Expedited Motion and OALJ’s Proposed Revised Schedule (“Proposed Revised Schedule”).

PECO supports the OALJ’s Proposed Revised Schedule, which establishes: (1) “on or before” dates for an evidentiary hearing and the filing of briefs; and (2) fixed dates for the filing of reply comments and a revised plan as well as certification of the record. PECO respectfully proposes dates for additional deadlines consistent with the OALJ’s Proposed Revised Schedule, as shown below:

<u>Event</u>	<u>Proposed Deadline</u>
Service of Other Parties’ Supplemental Direct Testimony	January 20, 2021
Service of Rebuttal Testimony	January 29, 2021
Telephone Evidentiary Hearing	February 5, 2021
Filing and Service of Briefs	February 18, 2021

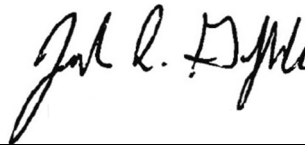
¹ Joint Movants are the Coalition For Affordable Utility Services And Energy Efficiency In Pennsylvania (“CAUSE-PA”), Natural Resourced Defense Counsel (“NRDC”), Office of Consumer Advocate (“OCA”), Office of Small Business Advocate (“OSBA”), Commission on Economic Opportunity (“CEO”), Community Action Association of Pennsylvania (“CAAP”), the Sustainable Energy Fund of Central Pennsylvania (“SEF”), and Tenant Union Representative Network (“TURN”).

Filing and Service of Reply Comments and/or Revised Phase IV EE&C Plan	March 1, 2021
Certification of Record	March 2, 2021

PECO believes the OALJ's schedule with the Company's proposed additions will allow for an orderly completion of discovery in advance of the hearing and provide the parties sufficient time to prepare post-hearing submissions.

WHEREFORE, PECO Energy Company submits this Response to the Joint Expedited Motion for Extension of Procedural Schedule and OALJ's Proposed Revised Schedule and respectfully requests that Deputy Chief Administrative Law Judge Hoyer and Administrative Law Judge DeVoe approve the proposed schedule herein.

Respectfully submitted,



Anthony E. Gay (Pa. No. 74624)
 Jack R. Garfinkle (Pa. No. 81892)
 PECO Energy Company
 2301 Market Street
 P.O. Box 8699
 Philadelphia, PA 19101-8699
 Phone: 215.841.4608
 Fax: 215.568.3389
anthony.gay@exeloncorp.com
jack.garfinkle@exeloncorp.com

Kenneth M. Kulak (Pa. No. 75509)
 Catherine G. Vasudevan (Pa. No. 210254)
 Morgan, Lewis & Bockius LLP
 1701 Market Street
 Philadelphia, PA 19103-2921
 Phone: 215.963.5234
 Fax: 215.963.5001
ken.kulak@morganlewis.com
catherine.vasudevan@morganlewis.com

January 13, 2021
 DB1/ 118250252.2

Counsel for PECO Energy Company