



November 21, 2019

VIA E-File

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street, Filing Room
Harrisburg, PA 17120

Re: **2019 Amendments to Policy Statements on Customer Assistance Programs 52 Pa. Code §§ 69.261-69.267, Docket No. M-2019-3012599;**

Energy Affordability for Low-Income Customers in Pennsylvania, Docket No. M-2017-2587711;

Review of Universal Service and Energy Conservation Programs, Docket No. M-2017-2596907

Letter Requesting Extension of Response Period for CAUSE-PA, TURN, and Action Alliance

Dear Secretary Chiavetta,

On November 20, 2019, the Office of Consumer Advocate (OCA) filed a Petition for Reconsideration and/or Clarification in the above-captioned matters. On that same date, the Energy Association of Pennsylvania (EAP) filed a Petition for Reconsideration and Clarification of Final Policy Statement Order Entered On November 5, 2019, as well as a Petition for Stay of Ordering Paragraphs Six, Seven, and Eight of Final Policy Statement Order, at Docket No. M-2019-3012599.

Pursuant to 52 Pa. Code § 5.571(c), answers to the Petitions for Reconsideration are due Monday, December 2, 2019. This is the first day after the Thanksgiving holiday. Pursuant to 52 Pa. Code § 5.61(a)(1), an answer to the Petition for Stay is due December 12, 2019.

On behalf of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA), the Tenant Union Representative Network (TURN), and Action Alliance of Senior Citizens of Greater Philadelphia (Action Alliance),¹ we request that the period for filing answers to OCA's Petition for Reconsideration and/or Clarification, and EAP's Petition for Reconsideration and Clarification be extended to **December 9, 2019**. If granted, Counsel will make every effort to also respond to EAP's Petition for Stay on that date as well.

Attorneys for CAUSE-PA, TURN, and Action Alliance have numerous immovable conflicts during the response period which curtail their ability to fully review and reply to the aforementioned Petitions without this brief extension of time.

Counsel for the OCA and EAP have indicated that they do not oppose this request.

We recognize that time is of the essence in terms of the Commission retaining jurisdiction to determine the merits, and therefore we do not object to the Commission granting reconsideration pending review of such merits.

Accordingly, we request an extension of time to December 9, 2019 to file answers to EAP's and OCA's Petitions for Reconsideration. If you have any questions regarding this filing, please let us know. Thank you for your attention in this matter.

Respectfully Submitted,
Counsel for CAUSE-PA



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CC: Parties of Record in Accord with Certificate of Service

¹ TURN and Action Alliance are represented at this docket by the attorneys at Community Legal Services, Inc. of Philadelphia. They have authorized us to make this request on their behalf and on behalf of their clients.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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| 2019 Amendments to Policy Statements on Customer Assistance Programs 52 Pa. Code §§ 69.261-69.267 | : | M-2019-3012599 |
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| Energy Affordability for Low-Income Customers in Pennsylvania | : | M-2017-2587711 |
| | : | |
| Review of Universal Service and Energy Conservation Programs | : | M-2017-2596907 |
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served copies of the Letter Requesting Extension of Response Period of CAUSE-PA, TURN, and Action Alliance in accordance with the requirements of 52 Pa. Code § 1.54 in the manner and upon the persons listed below.

VIA FIRST-CLASS MAIL AND/OR EMAIL

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VIA EMAIL

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Dated: November 21, 2019