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April 29, 2015

Rosemary Chiavetta, Esq., Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, Pennsylvania 17120

**RE: PETITION FOR EXPEDITED ORDER GRANTING AN EXTENSION OF TIME
TO FILE REPLY COMMENTS TO ACT 129 PHASE III TENTATIVE
IMPLEMENTATION ORDER AT DOCKET NO. M-2014-2424864**

Dear Secretary Chiavetta:

Enclosed for filing please find the Energy Association of Pennsylvania's Petition in the above-referenced Docket Number seeking an **Expedited Order Granting an Extension of Time To File Reply Comments**. A copy of the Petition has been served pursuant to the included Certificate of Service.

Sincerely,

A handwritten signature in black ink, appearing to read "Donna M. J. Clark".

Donna M. J. Clark
Vice President and General Counsel

Enclosure

cc: Kriss Brown, Esq. (by Email)
EDCs Subject to Act 129

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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Energy Efficiency and Conservation Program

Petition of the Energy Association of Pennsylvania for an Expedited Order Granting an Extension of Time to File Reply Comments : : **Docket No. M-2014-2424864**

PETITION FOR AN EXPEDITED ORDER GRANTING AN EXTENSION OF TIME TO FILE REPLY COMMENTS TO ACT 129 PHASE III TENTATIVE IMPLEMENTATION ORDER

NOW COMES, the Energy Association of Pennsylvania (“EAP”) acting on behalf of its electric distribution company members (“EDCs”) subject to Act 129 of 2008¹ and petitions the Pennsylvania Public Utility Commission (“PUC” or “Commission”) pursuant to 52 Pa. Code §§1.15 and 5.41 for an Expedited Order granting an Extension of Time until May 22, 2015 to all commentators to file reply comments to the Energy Efficiency and Conservation Program Tentative Order, (Phase III Tentative Implementation Order), Docket No. M-2014-2424864, entered on March 11, 2015. In support of this petition, EAP states the following:

1. On March 11, 2015, the Commission entered a Tentative Order concerning implementation of a Phase III Energy Efficiency and Conservation Program (“Phase III EE&C Program”) and seeking public comments on the evaluation of the proposed Phase III EE&C Program, on the proposed additional incremental reductions in electric consumption and peak demand, and on the proposed parameters and rules for the design and implementation of the next phase of Act 129 Energy Efficiency and Conservation Plans (“Act 129 EE&C Plans”) which are

¹ EAP members subject to Act 129 include Duquesne Light Company (“Duquesne”); Metropolitan Edison Company (“Met-Ed”); PECO Energy Company (“PECO”); Pennsylvania Electric Company (“Penelec”); Pennsylvania Power Company (“Penn Power”); PPL Electric Utilities (“PPL”) and West Penn Power Company (“West Penn Power”).

to begin on June 1, 2016. Pursuant to the Tentative Order, comments were due on April 27, 2015 and reply comments are due on May 12, 2015.

2. EAP filed comments on April 27 as did each of its member EDCs subject to Act 129 along with the statutory advocates and a number of other stakeholders.

3. April 27 was also the filing date for submitting comments regarding the 2016 Total Resource Cost (TRC) Test, Tentative Order, Docket No. M-2015-2468992, entered on March 11, 2015. Comments were filed in that docket by the EDCs subject to Act 129 along with other interested parties. Reply comments in that proceeding are due on or about the same date, i.e., May 12, 2015.

4. Resolution of the numerous issues addressed in both the Phase III Tentative Implementation Order and the 2016 TRC Test Tentative Order are crucial to the design, filing and implementation of a cost-effective Phase III EE&C Plan that will be filed by each EDC subject to Act 129. EAP anticipates that these plans will collectively spend almost a quarter of a billion dollars during each year of Phase III together with additional sums to fund a Statewide Evaluator (“SWE”) for Phase III.

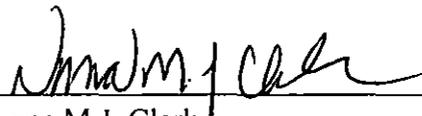
5. Given the complex technical, legal and policy issues raised by the initial proposals set forth in the Phase III Tentative Implementation Order and the extent of the comments filed which contain both legal and policy analysis AND additional relevant facts for consideration and comparison to the opinions provided by the SWE, EAP requests an extension of time until May 22, 2015 for all commentators to file reply comments.

6. EAP asserts that the extra time (8 business days) sought through this request is necessary to ease the constraints of replying to multiple sets of complex comments on or about the same date. Further, the additional time would likely result in reply comments that provide the

Commission with a more thorough analysis of the factual information and suggestions set forth in the initial comments to the Phase III Tentative Implementation Order.

7. EAP maintains that the requested extension would not impact the tentative timeline established by the Commission to issue a final order concerning Phase III implementation in mid-June 2015. Alternatively, if the Commission deems the requested extension as excessive, EAP requests that the Commission provide an extension of a shorter duration such as a calendar week.

WHEREFORE, the Energy Association of Pennsylvania respectfully requests the Commission to issue an expedited order granting an extension of time until May 22, 2015 for all commentators to file reply comments to the Phase III Tentative Implementation Order.



Donna M.J. Clark
Vice President and General Counsel
Energy Association of Pennsylvania
800 N Third Street, Suite 205
Harrisburg, PA 17102-2025
Atty. ID # 39866

Date: April 29, 2015

Certificate of Service

I hereby certify that I have served a copy of the foregoing **“Petition for an Expedited Order Granting an Extension of Time to File Reply Comments to Phase III Tentative Implementation Order”** on the persons listed below, by means of first-class mail:

Demand Response Supporters
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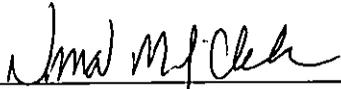
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