

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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March 21, 2017

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

Re: *En Banc* Hearing on Alternative Ratemaking  
Methodologies  
Docket No. M-2015-2518883

Dear Secretary Chiavetta:

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

Respectfully Submitted,

/s/ Kristine E. Marsilio  
Kristine E. Marsilio  
Assistant Consumer Advocate  
PA Attorney I.D. #316479

Enclosure  
230766

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Alternative Ratemaking Methodologies : Docket No. M-2015-2518883

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

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Pursuant to Section 5.103 of the Pennsylvania Public Utility Commission's regulations, 52 Pa. Code Section 5.103, the Office of Consumer Advocate (OCA), hereby files this Motion for an Extension of Time for Comments and Reply Comments (Motion) in the above-captioned proceeding. Through this Motion, the OCA requests that the Commission amend its Tentative Order dated March 2, 2017 to allow 90 days from the entry date of the Order for interested parties to submit Comments and 150 days from the entry date of the Order to submit Reply Comments. In support of this Motion, the OCA provides the following:<sup>1</sup>

1. On December 31, 2015, the Pennsylvania Public Utility Commission (Commission) issued a notice of *En Banc* Hearing on Alternative Ratemaking Methodologies at Docket No. M-2015-2518883 to be held on March 3, 2016.
2. A number of interested parties, including the OCA, testified before the Commission at the March 3, 2016 *En Banc* Hearing.

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<sup>1</sup> The Commission's Bureau of Investigation and Enforcement, the Office of Small Business Advocate, the Pennsylvania Utility Law Project, and the Energy Association of Pennsylvania have reviewed this Motion and have indicated that they are in support of the relief requested herein.

3. After the *En Banc* Hearing, the Commission invited all interested parties to submit Comments no later than March 16, 2016. The OCA and more than twenty other interested parties submitted Comments.

4. On March 2, 2017, the Commission issued a Tentative Order wherein it seeks additional input regarding alternative rate methodologies. Specifically, the Commission seeks responses to numerous, comprehensive questions related to the reasonableness and efficiency of different alternative rate methodologies as applied across the various utility industries. The Commission ordered that Comments be submitted within 45 days of the entry date of the Order and that Reply Comments be submitted within 75 days of the entry of the Order.

5. Vice Chairman Andrew G. Place also issued a Statement on March 2, 2017, wherein he proposed additional questions and issues for comment.

6. The OCA respectfully requests that the Commission amend its Tentative Order to allow 90 days from the entry date of the Order for interested parties to submit Comments and 150 days from the entry date of the Order to submit Reply Comments. Specifically, the OCA proposes that Comments would be due by May 31, 2017, and Reply Comments would be due by July 31, 2017.

7. The issues being examined by the Commission are extremely important utility issues in Pennsylvania, and it is essential that there is a full and complete record. The OCA submits that additional time to comment is necessary due to the complexity, depth, and number of issues raised in the Commission's Tentative Order and the Statements of Vice Chairman Place and Commissioner Sweet. Additionally, competing deadlines in both state and federal proceedings would make it challenging for the OCA to provide thorough and comprehensive responses to the issues raised within the timeframe provided by the Commission in its Tentative Order.

8. Additionally, the OCA notes that the Commission now seeks comments related to the effect of utilizing alternative rate methodologies on water and wastewater utilities, *inter alia*, whereas the initial *En Banc* Hearing focused on alternative rate methodologies for energy utilities. As such, the OCA submits that parties interested in providing comments related to water and wastewater utilities may need more time to address these new issues.

WHEREFORE, the Office of Consumer Advocate, respectfully requests that the Commission amend its Tentative Order dated March 2, 2017 to allow 90 days from the entry date of the Order for interested parties to submit Comments and 150 days from the entry date of the Order to submit Reply Comments.

Respectfully Submitted,



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230624

CERTIFICATE OF SERVICE

Alternative Ratemaking Methodologies : Docket No. M-2015-2518883

I hereby certify that I have this day served a true copy of the foregoing document, the Motion of the Office of Consumer Advocate for an Extension of Time for Comments and Reply Comments, in the manner and upon the persons listed below:

Dated this 21st day of March 2017.

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