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December 22, 2017

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

**Re: ROE Working Group, M-2012-2293611
Act 11 Final Implementation Order, M-2012-2317272
Request for Extension to Respond to Secretarial Letter dated November 27, 2017**

Dear Secretary Chiavetta:

On November 27, 2017, the Pennsylvania Public Utility Commission ("Commission") issued a Secretarial Letter regarding the ROE Working Group, M-2012-2293611, and Act 11 Final Implementation Order, M-2012-2317272, requesting input and guidance regarding its proposal to modify the manner in which the barometer group for electric distribution companies ("EDCs") is selected for the Commission's Quarterly Earnings Report ("QER"). The parameters for selecting the barometer group for EDCs was established in an earlier Secretarial Letter at the above-referenced docket in April 2013. The Commission seeks to eliminate the geographic restriction of selecting EDCs for the barometer group based on *Value Line* East Group Electric Utility companies and to include EDCs from the *Value Line* Central and West Group of Electric Utility group of companies. The Secretarial Letter set a deadline for responses from Interested Parties of January 8, 2018.

The Energy Association of Pennsylvania ("EAP") is a trade association whose members include the major natural gas and electric public utilities operating in the Commonwealth of Pennsylvania. EAP participated in the ROE Working Group along with its natural gas and electric utility member companies. EAP respectfully requests an extension to respond to the above-captioned Secretarial Letter until January 19, 2018 to allow for further analysis in connection with

its EDC members¹ on the impact of the proposed modification. EAP seeks an extension that would be available to all Interested Parties served with the November 27, 2017 Secretarial Letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Donna M.J. Clark". The signature is fluid and cursive, with a long horizontal stroke at the end.

Donna M.J. Clark

Vice President and General Counsel

cc, via email: Paul Diskin, Director, TUS
Bohdan R. Pankiw, Chief Counsel
Robert Young, Law Bureau
Erin Laudenslager, TUS
Andrew Herster, TUS
David Huff, TUS
Participants in the Commission's Return on Equity ("ROE") Working Group

¹ Citizens' Electric Company; Duquesne Light Company; Metropolitan Edison Company; PECO Energy Company; Pennsylvania Electric Company; Pennsylvania Power Company; Pike County Light & Power Company; PPL Electric Utilities; UGI Utilities, Inc.-Electric Division; Wellsboro Electric Company; and West Penn Power Company.