

IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA
SECOND APPELLATE DISTRICT

SOUTHERN CALIFORNIA GAS
COMPANY,

Petitioner,

vs.

CALIFORNIA PUBLIC UTILITIES
COMMISSION,

Respondent.

Case No. B310811

Commission Decision No.
D.21-03-001 and
Resolution ALJ-391

**JOINT APPLICATION FOR EXTENSION OF TIME TO ANSWER
PETITION AND TO REPLY TO ANSWER**

AROCLES AGUILAR SBN 94753
MARY MCKENZIE, SBN 99940
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March 19, 2021

Petitioner Southern California Gas Company filed its petition in this matter on March 8, 2021. Respondent California Public Utilities Commission may serve and file an answer within 35 days, pursuant to California Rules of Court, Rule 8.724(b). Accordingly, the answer is due on April 12, 2021. Petitioner and Respondent (collectively, “Parties”) have agreed to an extension of time for Respondent to file its answer to the petition and for Petitioner to file a reply to the answer.

Consistent with California’s COVID-19 shelter-in-place and social distancing requirements, the majority of the Commission’s staff have been working remotely, including the assigned counsel in the case. The COVID-19 pandemic has also impacted Petitioner’s counsel. Remote work may result in administrative hardship and delays.

Parties have agreed to a 50-day extension of time for Respondent to file an answer to the petition. Accordingly, the Parties propose that the due date for Respondent’s answer be extended from April 12, 2021 to June 1, 2021.

The Petitioner’s reply would have been due on May 7, 2021, 25 days after the original due date for the answer. (Cal. Rules of Court, Rule 8.724(b)(2).) Assuming the Court approves the new agreed upon deadline for the filing of an answer, the Parties have agreed to a 20-day extension of Petitioner’s deadline to file a reply. Thus, Parties request that the new deadline for the filing of the reply be 45 days from June 1, 2021, or July 16, 2021.

Dated: March 19, 2021

Respectfully submitted,

AROCLES AGUILAR SBN 94753
MARY MCKENZIE, SBN 99940
CARRIE PRATT, SBN 186038
EDWARD MOLDAVSKY, SBN 239267

By: /s/ Edward Moldavsky
EDWARD MOLDAVSKY

Attorneys for Respondent
California Public Utilities Commission

Dated: March 19, 2021

JULIAN POON, SBN 219843

By: /s/ Julian Poon
JULIAN POON

Attorney for Petitioner
Southern California Gas Company

Document received by the CA 2nd District Court of Appeal.

[PROPOSED] ORDER

IT IS SO ORDERED that the deadline for the filing of an answer by Respondent to the petition for writ of review shall be June 1, 2021. Any reply by the Petitioner shall be due by July 16, 2021.

Dated: _____

Presiding Justice

Document received by the CA 2nd District Court of Appeal.

**DECLARATION OF EDWARD MOLDAVSKY IN SUPPORT OF JOINT
APPLICATION FOR EXTENSION OF TIME TO ANSWER PETITION
AND TO REPLY TO ANSWER**

I, Edward Moldavsky, declare as follows:

1. I am an attorney at law duly licensed to practice before all courts in the State of California and am employed as Staff Counsel with the California Public Utilities Commission (Commission). I have personal knowledge of the facts set forth below, and if called as a witness, I could, and would, testify competently to these facts.

2. The Commission has not previously requested or received any extensions of time in this matter.

3. Consistent with California's COVID-19 shelter-in-place and social distancing requirements, the majority of the Commission's staff have been working remotely, including the assigned counsel in the case. Remote work may result in administrative hardship and delays.

4. I have consulted with counsel for Petitioner and understand from those discussions that they are also impacted by the COVID-19 pandemic and that they agree with the extensions proposed herein.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this March 19, 2021, at San Francisco, California,

/s/ Edward Moldavsky
Edward Moldavsky