

Republic of the Philippines
ENERGY REGULATORY COMMISSION
San Miguel Avenue, Pasig City

**IN THE MATTER OF THE PETITION
FOR THE AVAILMENTS FROM THE
UNIVERSAL CHARGE THE SHARE
FOR MISSIONARY
ELECTRIFICATION**

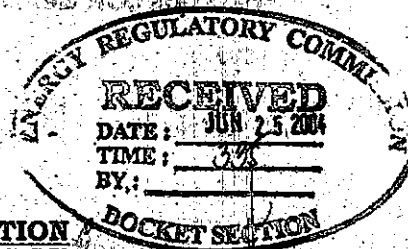
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ERC CASE NO. 2002-165

**NATIONAL POWER CORPORATION
SMALL POWER UTILITIES GROUP
(NPC-SPUG)**

Petitioner.

x-----x



**URGENT EX-PARTE MOTION
FOR EXTENSION OF TIME TO FILE COMMENT**

Petitioner National Power Corporation-Small Power Utilities Group (NPC-SPUG), thru the undersigned counsel, to this Honorable Commission respectfully avers that:

1. On June 14, 2004, petitioner NPC-SPUG received a copy of this Honorable Commission's Order giving it (NPC-SPUG) a period of ten (10) days if it so desires to file its comment to "Motion For Clarification" filed by the Power Sector Assets and Liabilities Management Corporation (PSALM);

2. The ten (10) day period within which to file said comment is due to lapse on June 24, 2004;

3. The draft of the SPUG's comment was only forwarded to the Office of the General Counsel (OGC) on June 21, 2004. There is however a need for OGC to review and discuss with the management said comment prepared by SPUG. Hence, it will certainly take additional time for NPC-SPUG to prepare and file its comment to PSALM's motion for clarification. Further, the heavy workload brought about by the daily court appearances and preparation of other equally important pleadings that the undersigned counsel has to attend to render it impossible for the petitioner to comply with the 10 day period to file its comment;

4. In view of the foregoing, the petitioner would like to ask the kind indulgence of the Honorable Commission that it be given an

extension of at least ten (10) days to file its comment to PSALM's "Motion For Clarification" dated June 9, 2004;

5. This motion is not intended to delay the proceedings of this case but solely for the reason above-stated.

WHEREFORE, PREMISES CONSIDERED, it is most respectfully prayed of this Honorable Commission that petitioner NPC-SPUG be given another period of at least ten (10) days from June 24, 2004 or until July 2, 2004 to file its comment to PSALM's Motion for Clarification dated June 9, 2004.

Other reliefs just and equitable under the premises are likewise prayed for.

Quezon City for Pasig City, Metro Manila, June 23, 2004.

FOR THE SOLICITOR GENERAL



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GREETINGS:

Please submit the foregoing Urgent Motion for Extension of Time for the consideration of the Honorable Commission immediately upon receipt hereof without further oral arguments.


ATTY. G. S. MONTOJO

EXPLANATION

Filing and service of the foregoing pleading were done by registered mail instead of personal service as mandated by the 1997 Rules of Civil Procedure due to distance, time and manpower constraints.


ATTY. G. S. MONTOJO