

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

<b>Houlian Chen</b>	)	<b>Docket No. IN15-3-000</b>
<b>Powhatan Energy Fund, LLC</b>	)	
<b>HEEP Fund, Inc.</b>	)	
<b>CU Fund, Inc.</b>	)	

**ANSWER OF ENFORCEMENT STAFF TO EXPEDITED MOTION FOR  
THIRTY-DAY EXTENSION OF TIME**

Under Commission Rule 213, 18 C.F.R. § 385.213(d)(2)(ii), Respondents have 30 days to respond to an order to show cause. In their Expedited Motion for Thirty Day Extension of Time (Motion), Respondents ask for an additional 30 days. So long as granting Respondents additional time would not prejudice the Commission’s ability to fully assess the pleadings in a timely manner, Office of Enforcement staff (Enforcement) would not object to the Commission’s granting Respondents’ request. Consistent with that position and prior to Respondents’ filing the Motion, Enforcement told Respondents it would not oppose their request if Respondents agreed to toll the statute of limitations for a corresponding 30 days. This balanced approach would have given Respondents the additional time they seek while also protecting the public interest. Respondents, however, have rejected this reasonable approach.<sup>1</sup>

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<sup>1</sup> Respondents’ assertion that responding to the order to show cause requires them to analyze “considerable additional evidence” is not compelling. Respondents have been on clear notice of Enforcement’s factual and legal conclusions since at least August 2013 (when Enforcement provided its written preliminary findings), and Respondents have

Accordingly, the Commission should deny the motion.<sup>2</sup>

Respectfully submitted,

/s/

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vigorously argued their case on multiple occasions. Moreover, the materials provided on December 18, 2014 were offered to Respondents in September 2014, but Respondents refused to execute a standard non-disclosure agreement and thereby declined to accept them.

<sup>2</sup> If Respondents were to reconsider their position and agree to a 30-day tolling of the statute of limitations, Enforcement would not oppose a renewed request for a corresponding extension of time.