

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF PUBLIC UTILITIES**

**Investigation by the Department of** )  
**Public Utilities Into Initiatives to** )  
**Promote and Protect Consumer Interests** ) **D.P.U. 19-07**  
**in the Retail Electric Competitive Supply** )  
**Market** )

**MOTION FOR AN EXTENSION OF TIME**

Pursuant to 220 C.M.R. 1.02(5), the National Consumer Law Center (“NCLC”), hereby requests an extension of time for all parties to file comments in the above-referenced proceeding. Pursuant to the Hearing Officer’s Memorandum regarding Request for Comments, dated February 5, 2020, written comments on Tier Two initiatives and proposed license renewal process are currently due on Thursday, March 19, 2020.

There is good cause for the Department of Public Utilities (the “Department”) to grant this Motion for an Extension of Time. NCLC has good cause to request an extension of time for parties to file comments on the Tier Two proposals and proposed license renewal process, due to the current state of emergency declared by both the state<sup>1</sup> and federal<sup>2</sup> governments in response to the COVID-19 pandemic. Due to the immense disruptions caused by the pandemic, including the need to implement social distancing, transition to remote work locations, the closing of schools and child care facilities on short notice, and other disruptions, counsel has been required to attend to a number of urgent matters. NCLC respectfully requests a two-week extension to file comments on the Department’s Tier Two proposals and proposed license renewal process, moving the current deadline of March 19, 2020 to a new deadline of April 2, 2020 for all parties.

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<sup>1</sup> Executive Order No. 591: Declaration of a State of Emergency to Respond to COVID-19 (March 10, 2020).

<sup>2</sup> Proclamation on Declaring a National Emergency Concerning the Novel Coronavirus Disease (COVID-19) Outbreak (March 13, 2020).

NCLC has been in contact with some parties that have participated in D.P.U. 19-07, and the Office of the Attorney General (“AGO”), National Grid, Eversource and Unitil support the request for a two-week extension for all parties.

NCLC respectfully requests that the Department grant this Motion for an Extension of Time as stated herein.

National Consumer Law Center, on behalf of our low-income clients

By:

A handwritten signature in cursive script, appearing to read "Jenifer Bosco".

Jenifer Bosco  
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Dated: March 16, 2020

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served or caused to be served the foregoing documents upon each party identified in the Department’s service list in the above-captioned proceeding in accordance with the requirements of 220 CMR 1.05(1) and the Department’s Memorandum Regarding Temporary Changes to Filing Requirements, issued March 12, 2020.

Respectfully submitted,



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DATE: March 16, 2020