COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF PUBLIC UTILITIES

Investigation by the Department of Public)	
Utilities on its own Motion 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), Patriot Energy Group, Inc. and EMEX, LLC (collectively, "Patriot/EMEX") respectfully request an extension of time for all parties to file any motions for reconsideration and/or clarification in response to the Order on Tier One Initiatives (the "Order"), issued by the Department of Public Utilities (the "Department") on May 22, 2020.

There is good cause for the Department to grant this Motion for an Extension of Time as requested by Patriot/EMEX for all parties to file any motions for reconsideration and/or clarifications with respect to the Order, which would ordinarily be due on June 11, 2020, per 220 C.M.R. 1.11(10) and 220 C.M.R. 1.11(11). In this instance, the Hearing Officer has informed parties that "the Department plans to convene a Zoom conference meeting with stakeholders on June 18, 2020" and, as the Department directed "the Hearing Officer would provide further direction to stakeholders regarding the implementation details associated with the initiative." Patriot/EMEX believes that this meeting may provide sufficient detail and clarity on many of the issues addressed by the Order, which may lessen (or completely obviate) the need by parties to request clarification or reconsideration of matters within the Order.

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¹ Email from Hearing Officer to service list, dated May 29, 2020.

Thus, Patriot/EMEX respectfully requests a two-week extension of the deadline to file such motions by all parties to June 25, 2020, which will be one week following the meeting with stakeholders.

Patriot/EMEX requests that the Department grant this Motion for an Extension of time as stated herein.

Respectfully Submitted,

PATRIOT ENERGY GROUP, INC.

EMEX, LLC

By the undersigned,

Dated: June 9, 2020

Matthew T. Kinney BBO #679539

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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.

By the undersigned,

Dated: June 9, 2020

Matthew T. Kinney

BBO #679539

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