

THE COMMONWEALTH OF MASSACHUSETTS OFFICE OF THE ATTORNEY GENERAL

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June 26, 2020

Mark D. Marini, Secretary Department of Public Utilities One South Station, 5th Floor Boston, Massachusetts 02110

RE: D.P.U. 20-58, Inquiry of the Department of Public Utilities into Establishing Policies and Practices for Electric and Gas Companies Regarding Customer Assistance and Ratemaking Measures in Connection to the State of Emergency Regarding the Novel Coronavirus (COVID-19).

Dear Secretary Marini:

Enclosed for filing please find the Office of the Attorney General's *Motion for Extension of Time* in the above-captioned matter.

The Office of the Attorney General is authorized to represent that it has consulted with each of the parties in the Working Group and no party had an objection to the motion.

Thank you and please do not hesitate to contact me if you have any questions.

Sincerely,

/s/ Elizabeth A. Anderson

Elizabeth A. Anderson Assistant Attorney General

cc: Rachel Cottle, Esq., Hearing Officer
D.P.U. 20-58 Working Group Contact List

COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF PUBLIC UTILITIES

Inquiry of the Department of Public Utilities into Establishing Policies and Practices for Electric and Gas Companies Regarding Customer Assistance and Ratemaking Measures in Connection to the State of Emergency Regarding the Novel Coronavirus (COVID-19).

D.P.U. 20-58

MOTION FOR EXTENSION OF TIME BY THE OFFICE OF THE ATTORNEY GENERAL

Pursuant to 220 C.M.R. § 1.02(5), the Office of the Attorney General ("AGO") respectfully moves for an extension of time in the above-captioned matter. Specifically, the AGO requests to extend the deadline to file a consensus ratemaking proposal by two weeks. As directed by the Department of Public Utilities (the "Department") on page 10 of its order issued on May 11, 2020, the current deadline to file a consensus ratemaking proposal, with any differences identified, is three weeks following the Distribution Companies' submission of their ratemaking proposal to the Working Group, *i.e.* June 30, 2020. The AGO requests a two-week extension to July 14, 2020.

Good cause exists to modify the procedural schedule in this manner. Per 220 C.M.R. § 1.02(5), "for good cause shown, any time limit prescribed or allowed by 220 CMR 1.00 may be extended" in the discretion of the Commission or the presiding officer. Here, good cause exists because key AGO personnel assigned to this matter also have been heavily engaged during the past two weeks with the Eversource Gas rate case hearings and the settlement discussions concerning Eversource and Columbia Gas. As a result, the AGO requires an additional two

weeks in order to complete its analysis of the Distribution Companies' detailed ratemaking proposal, develop a response, and further coordinate with the Working Group to determine areas of agreement.¹ Accordingly, because good cause exists, the Department should grant the AGO's requested extension of time.

WHEREFORE, the AGO respectfully requests that the Department grant its request to extend the deadline to file a consensus ratemaking proposal, with differences identified, to July 14, 2020.

Respectfully submitted,

MAURA HEALEY ATTORNEY GENERAL

By: Selizabeth A. Anderson
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Dated: June 26, 2020

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¹ As noted in the cover letter to this Motion, the AGO has consulted with the parties and no party has an objection to the requested extension.

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D.P.U. 20-58

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all parties of record in these proceedings in accordance with the requirements of 220 C.M.R. 1.05(1) (Department's Rules of Practice and Procedure). Dated at Boston this 26th day of June, 2020.

/s/ Elizabeth A. Anderson
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