

KEEGAN WERLIN LLP

ATTORNEYS AT LAW
99 HIGH STREET, SUITE 2900
BOSTON, MASSACHUSETTS 02110

(617) 951-1400

TELECOPIER:
(617) 951-1354

July 30, 2020

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

Re: Inquiry into Establishing Policies and Practices for Electric and Gas Companies – D.P.U. 20-58

Dear Secretary Marini:

On behalf of the Distribution Companies enclosed is a revised Motion for an Extension of Time in the above-referenced docket. The Distribution Companies are providing a clean and a redlined version of the Motion for an Extension of Time for ease of review.

Thank you for your attention to this matter. Please contact me or any of the Distribution Companies' counsel with any questions you may have regarding this filing.

Sincerely,



Ashley Wagner, Esq.

Enclosures

cc: Rachel Cottle, Esq. – Hearing Officer
Elizabeth Anderson, Esq. – Office of the Attorney General
Robert Hoagland, Esq. – Department of Energy Resources
Charles Harak, Esq. - National Consumer Law Center
Jerrold Oppenheim, Esq. – LEAN
Robert Rio – Associated Industries of Massachusetts

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) D.P.U. 20-58
Regarding the Novel Coronavirus (COVID-19))
Pandemic.)
_____)

JOINT MOTION FOR AN EXTENSION OF TIME

Fitchburg Gas and Electric Light Company d/b/a Unitil (“Unitil”), Massachusetts Electric Company and Nantucket Electric Company, Boston Gas Company and Colonial Gas Company, each d/b/a National Grid (“National Grid”), and NSTAR Gas Company and NSTAR Electric Company, each d/b/a Eversource Energy (“Eversource”), Bay State Gas Company d/b/a Columbia Gas of Massachusetts (“CMA”), Liberty Utilities (New England Natural Gas Company) Corp. d/b/a Liberty (“Liberty”), and The Berkshire Gas Company (“Berkshire”)(together, the “Distribution Companies”) pursuant to 220 C.M.R. 1.02(5) hereby request an extension to file an update to the Working Group’s Customer Assistance Report.

On May 11, 2020, the Department of Public Utilities issued a Notice of Inquiry 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”) Pandemic (“NOI”). The NOI directed the Working Group to create a Customer Assistance Report followed by a consensus ratemaking proposal to support customer assistance initiatives and to maintain the financial integrity of the utilities in response to COVID-19. The Working Group submitted the Customer Assistance report on May 29, 2020. On June 26, 2020,

the Department issued D.P.U. 20-58-A directing the Working Group to update the Customer Assistance Report “identify such information as additional details, specific timelines, revisions, and any new approaches, including plans to progress to a new phase of the four-phase general plan at least ten business days prior to each progression” by July 30, 2020 (D.P.U. 20-58-A Order at 8).

The Distribution Companies, with the support or lack of objection from other members of the Working Group, has adhered to the directive through recent communications to the Department regarding the progression of communication phases and the need for advance notification to commercial customers regarding the potential for discontinuation of service (see D.P.U. 20-58 (July 10, 2020 and July 29, 2020 correspond to the Department, respectively)). The Working Group currently is continuing to work collaboratively to develop a Report with additional customer communications information, as contemplated by the directive. Given the time needed to coordinate, the Distribution Companies respectfully request an extension of three business days to submit the update to the Working Group’s Customer Assistance Report to the Department. This extension will result in moving the current deadline from Thursday, July 30, 2020 to Tuesday, August 4, 2020.

Respectfully Submitted,

DISTRIBUTION COMPANIES

By their attorneys,

**FITCHBURG GAS AND ELECTRIC
LIGHT COMPANY d/b/a UNITIL**



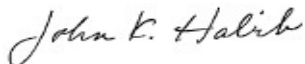
Gary Epler, Esq.
Unitil Service Corp
6 Liberty Lane West
Hampton, NH 03842
(603) 773-6440

**LIBERTY UTILITIES (NEW
ENGLAND NATURAL GAS
COMPANY) CORP. D/B/A LIBERTY**



Ronald J. Ritchie, Esq.
Liberty Utilities
36 Fifth Street
Fall River, MA 02721

EVERSOURCE ENERGY



John K. Habib, Esq.
Ashley S. Wagner, Esq.
Keegan Werlin LLP
99 High Street, Ste. 2900
Boston, MA 02110
(617) 951-1400

THE BERKSHIRE GAS COMPANY



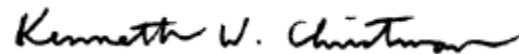
Daniel P. Venora, Esq.
Keegan Werlin LLP
99 High Street, Ste. 2900
Boston, MA 02110
(617) 951-1400

NATIONAL GRID



Meabh Purcell, Esq.
National Grid
40 Sylvan Road
Waltham, MA 02451

**BAY STATE GAS COMPANY d/b/a
COLUMBIA GAS OF
MASSACHUSETTS**



Kenneth Christman
NiSource Corporate Services Company
121 Champion Way, Suite 100
Canonsburg, PA, 15317

Dated: July 30, 2020

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) D.P.U. 20-58
Regarding the Novel Coronavirus (COVID-19))
Pandemic.)
_____)

JOINT MOTION FOR AN EXTENSION OF TIME

Fitchburg Gas and Electric Light Company d/b/a Unitil (“Unitil”), Massachusetts Electric Company and Nantucket Electric Company, Boston Gas Company and Colonial Gas Company, each d/b/a National Grid (“National Grid”), and NSTAR Gas Company and NSTAR Electric Company, each d/b/a Eversource Energy (“Eversource”), Bay State Gas Company d/b/a Columbia Gas of Massachusetts (“CMA”), Liberty Utilities (New England Natural Gas Company) Corp. d/b/a Liberty (“Liberty”), and The Berkshire Gas Company (“Berkshire”)(together, the “Distribution Companies”) pursuant to 220 C.M.R. 1.02(5) hereby request an extension to file an update to the Working Group’s Customer Assistance Report.

On May 11, 2020, the Department of Public Utilities issued a Notice of Inquiry 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”) Pandemic (“NOI”). The NOI directed the Working Group to create a Customer Assistance Report followed by a consensus ratemaking proposal to support customer assistance initiatives and to maintain the financial integrity of the utilities in response to COVID-19. The Working Group submitted the Customer Assistance report on May 29, 2020. On June 26, 2020,

the Department issued D.P.U. 20-58-A directing the Working Group to update the Customer Assistance Report “identify such information as additional details, specific timelines, revisions, and any new approaches, including plans to progress to a new phase of the four-phase general plan at least ten business days prior to each progression” by July 30, 2020 (D.P.U. 20-58-A Order at 8).

The Distribution Companies, with the support or lack of objection from other members of the Working Group, has adhered to the directive through recent communications to the Department regarding the progression of communication phases and the need for advance notification to commercial customers regarding the potential for discontinuation of service (see D.P.U. 20-58 (July 10, 2020 and July 29, 2020 correspond to the Department, respectively)). The Working Group currently is continuing to work collaboratively to develop a Report with additional customer communications information, as contemplated by the directive. Given the time needed to coordinate, the Distribution Companies respectfully request an extension of three business days to submit the update to the Working Group’s Customer Assistance Report ~~consensus ratemaking proposal~~ to the Department. This extension will result in moving the current deadline from Thursday, July 30, 2020 to Tuesday, August 4, 2020.

Respectfully Submitted,

DISTRIBUTION COMPANIES

By their attorneys,

**FITCHBURG GAS AND ELECTRIC
LIGHT COMPANY d/b/a UNITIL**



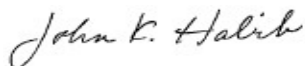
Gary Epler, Esq.
Unitil Service Corp
6 Liberty Lane West
Hampton, NH 03842
(603) 773-6440

**LIBERTY UTILITIES (NEW
ENGLAND NATURAL GAS
COMPANY) CORP. D/B/A LIBERTY**



Ronald J. Ritchie, Esq.
Liberty Utilities
36 Fifth Street
Fall River, MA 02721

EVERSOURCE ENERGY



John K. Habib, Esq.
Ashley S. Wagner, Esq.
Keegan Werlin LLP
99 High Street, Ste. 2900
Boston, MA 02110
(617) 951-1400

THE BERKSHIRE GAS COMPANY



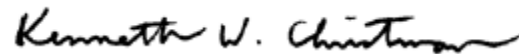
Daniel P. Venora, Esq.
Keegan Werlin LLP
99 High Street, Ste. 2900
Boston, MA 02110
(617) 951-1400

NATIONAL GRID



Meabh Purcell, Esq.
National Grid
40 Sylvan Road
Waltham, MA 02451

**BAY STATE GAS COMPANY d/b/a
COLUMBIA GAS OF
MASSACHUSETTS**



Kenneth Christman
NiSource Corporate Services Company
121 Champion Way, Suite 100
Canonsburg, PA, 15317

Dated: July 30, 2020