



THE COMMONWEALTH OF MASSACHUSETTS
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December 16, 2020

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

Re: Distributed Energy Resource Planning and Assignment and Recovery of Costs for the Interconnection of Distributed Generation, D.P.U. 20-75

Dear Secretary Marini:

Enclosed please find the Office of the Attorney General's *Motion for Extension of Time to File Initial and Reply Comments*. Please file according to your usual practice. Thank you for your attention to this matter.

Sincerely,

/s/ Elizabeth Mahony

Elizabeth Mahony
Assistant Attorney General

Enclosure

cc: Katie Zilgme, Hearing Officer
Service List

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES**

**Distributed Energy Resource Planning and
Assignment and Recovery of Costs for the
Interconnection of Distributed Generation**

D.P.U. 20-75

**OFFICE OF THE ATTORNEY GENERAL'S
MOTION FOR EXTENSION OF TIME
TO FILE INITIAL AND REPLY COMMENTS**

Pursuant to 220 C.M.R. 1.02(5), the Office of the Attorney General (“AGO”) respectfully requests that the Department of Public Utilities (“Department”) extend the deadline for filing initial and reply comments in the above-captioned proceeding. Pursuant to the Vote and Order opening the investigation issued by the Department, initial comments are due on December 17, 2020 and simultaneous reply comments are due on January 14, 2021. *Vote and Order Opening Investigation*, D.P.U. 20-75, at 7-8 (2020). The AGO respectfully requests that the Department grant a short, six-day extension to file initial comments to December 23, 2020 and a corresponding extension to February 5, 2021 for filing reply comments in order to accommodate the intervening holidays.

Good cause exists to grant the AGO’s motion for extension of time. On October 22, 2020, the Department opened an investigation into the electric distribution companies’ (“EDCs”) distributed energy resource (“DER”) planning and assignment and recovery of costs for the interconnection of distributed generation (“Order”). The Department docketed this matter as D.P.U. 20-75. As part of its Order, the Department included a Straw Proposal containing a new DER planning process and methods for cost assignment and recovery associated with DER

interconnection. Order, Att. A. Moreover, the Department posed a number of specific questions to stakeholders regarding the Straw Proposal and associated topics. *Id.* at 13-16.

As the Department is aware, the Straw Proposal raises a host of significant and complex issues associated with fundamental aspects of distribution system planning and cost allocation. Due to the ongoing COVID-19 pandemic, the AGO has experienced staffing challenges and competing deadlines in a number of dockets. Despite diligent efforts to overcome staffing challenges, the AGO requires additional time to complete its comments in order to adequately address the important issues raised by the Straw Proposal. Additionally, EDC personnel will likely face significant operational and logistical challenges in the coming days because of the impending winter storm.¹

No party will be prejudiced by the proposed extension of stakeholders' deadline to file initial and reply comments. Rather, a brief extension of time will only serve to ensure that the Department receives fully developed comments that further the challenging and robust discussions that the Order envisions. The AGO notes that it has conferred with counsel and/or representatives for the EDCs, the Department of Energy Resources, the Northeast Clean Energy Council, and Pope Energy. DOER and Pope Energy support the AGO's request. Similarly, NECEC does not object to the AGO's request and the EDCs take no position. Accordingly, good cause exists for the Department to exercise its discretion to extend the time to file simultaneous initial and reply comments in this matter to ensure that the AGO has adequate time to formulate and present its comments. *See* 220 C.M.R. 1.02(5).

¹ *Nor'easter to hit much of Massachusetts with 12-18 inches of snow; Winter storm warning now issued for nearly entire state*, <https://www.masslive.com/weather/2020/12/noreaster-to-hit-much-of-massachusetts-with-12-18-inches-of-snow-winter-storm-warning-now-issued-for-nearly-entire-state.html> (December 16, 2020)

WHEREFORE, the AGO respectfully requests that the Department grant its request to extend the deadline to file simultaneous initial comments December 23, 2020 and a corresponding extension to file reply briefs to February 5, 2021.

Respectfully submitted,

ATTORNEY GENERAL
MAURA HEALEY

By: /s/ Elizabeth Mahony
Elizabeth Mahony
Assistant Attorney General
Office of the Attorney General
Office of Ratepayer Advocacy
One Ashburton Place
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Dated: December 16, 2020

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all parties of record in this proceeding in accordance with the requirements of 220 C.M.R. 1.05(1) (Department's Rules of Practice and Procedure). Dated at Boston this 16th day of December, 2020.

/s/ Elizabeth Mahony
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