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April 7, 2021

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

Re: <u>Investigation by the Department of Public Utilities on its own Motion into Initiatives to Promote and Protect Consumer Interests in the Retail Electric Competitive Supply Market – D.P.U. 19-07 and 2019 Arrearage Management Plans, D.P.U. 19-AMP.</u>

Dear Mr. Marini:

Enclosed on behalf of Eversource Gas Company of Massachusetts d/b/a Eversource Energy ("EGMA") is EGMA's Motion for Extension of Time with respect to the Second Set of Information Requests issued by the Department of Public Utilities.

Thank you for your attention to this matter. Please contact me should you have any questions.

Sincerely,

Brendan P. Vaughan

Brendy P. Vayla

Enclosure

cc: Greggory Wade, Esq., Hearing Officer Katie Zilgme, Esq., Hearing Officer

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 in the Retail Electric Competitive Supply Market |)))) | D.P.U. 19-07 |
|--|------------------|---------------|
| and | , | |
| Arrearage Management Plans |) | D.P.U. 19-AMP |

MOTION OF EVERSOURCE GAS COMPANY OF MASSACHUSETTS d/b/a EVERSOURCE ENERGY FOR AN EXTENSION OF TIME

Eversource Gas Company of Massachusetts d/b/a Eversource Energy ("EGMA" or the "Company") pursuant to 220 C.M.R. 1.02(5), hereby requests an extension of time to file its responses to certain Information Request in the above-referenced proceeding.

On March 3, 2021, the Department of Public Utilities (the "Department") issued its Second Set of Information Requests to the Company. Following clarification from the Department, and pursuant to previously filed Motions for Extension of Time, the Company's responses to the Department's Second Set of Information Requests are due on April 7, 2021. As of the date of this filing, the Company has not yet filed its responses to the six questions addressed to the Company in the Department's Second Set of Information Requests (the "Outstanding Information Requests"). As explained below, the Company has good cause to request a brief extension of time to respond to the Outstanding Information Requests.

The Outstanding Information Requests seek detailed supporting documentation and information, in the aggregate, of competitive suppliers serving EGMA customers

Motion for Extension of Time

April 7, 2021

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historically. Good cause exists for the Department to grant a brief extension of time for

the Outstanding Information Requests as due to the detailed nature of these requests the

Company requires additional time to review its records and ensure that the information

provided is accurate and complete, and the Company must also confer with NiSource,

Inc. to ensure that it has obtained all of the documentation necessary to respond to the

Outstanding Information Requests.

The Company will make every effort to file its responses as soon as possible.

However, for the reasons stated above, EGMA respectfully requests an eight-business

day extension to respond to the Outstanding Information Requests. This will result in

moving the current deadline for the Company to respond to the Outstanding Information

Requests from Wednesday, April 7, 2021 to Monday, April 19, 2021.

Respectfully submitted by,

Eversource Gas Company of

Massachusetts d/b/a Eversource Energy

By its attorney,

Brendan P. Vaughan, Esq.

Brendy P. Vayla

Keegan Werlin LLP

99 High Street, Suite 2900

Boston, Massachusetts 02110

(617) 951-1400

Dated: April 7, 2021

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