

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES**

Investigation by the Department of Public Utilities on)
its Own Motion into Electric Distribution Companies') D.P.U. 20-75
(1) Distributed Energy Resource Planning and)
(2) Assignment and Recovery of Costs)
for the Interconnection of Distributed Generation)

DISTRIBUTION COMPANIES' MOTION FOR EXTENSION OF TIME

Massachusetts Electric Company and Nantucket Electric Company each d/b/a National Grid, NSTAR Electric Company d/b/a Eversource Energy, and Fitchburg Gas and Electric Light Company d/b/a Unitil (the "Distribution Companies" or "EDCs") pursuant to 220 C.M.R. 1.02(5) respectfully request that the Department of Public Utilities ("Department") grant an extension of time from June 11 until June 16, 2021 to file reply comments to interested participants' initial comments on the Distribution Companies' respective system planning analysis proposals. In support of this Motion, the Distribution Companies states the following:

1. On March 24, 2021, the Department issued a Hearing Officer Memorandum that announced next procedural steps, requested comments, and set forth information requests to the EDCs and stakeholders in this docket ("Memorandum"). The Memorandum established April 23, 2021 as the deadline for the EDCs to file system planning analysis proposals to implement the distribution system assessment process, May 7, 2021 as the deadline for interested participants to file initial comments, and May 14, 2021 as the deadline for interested participants to file reply comments. The EDCs filed their respective system planning analysis proposals on April 23, 2021.

2. On April 28, 2021, the Interstate Renewable Energy Council (“IREC”) submitted a request seeking a three week extension of the deadline to submit initial comments on the EDCs’ system planning analysis proposals, from Friday, May 7, 2021 to Friday, May 28, 2021. On April 30, 2021, the Department extended the deadline to submit initial comments on the EDCs’ system planning analysis proposals to May 28, 2021 and the deadline to submit reply comments to June 11, 2021.

3. On April 29, 2021, the Department tentatively scheduled a virtual technical conference on June 3, 2021 to discuss a potential provisional system planning program. Due to the importance and time sensitivity of the topic and the difficulty of scheduling the virtual technical conference on a date that works for all the anticipated participants, the EDCs strongly support keeping the June 3, 2021 date for the virtual technical conference.

4. The Department’s regulations grant discretion to the Commission or the presiding officer to extend any time limit prescribed in a proceeding, as long as good cause is demonstrated. 220 C.M.R. § 1.02(5). As Memorial Day is Monday, May 31, 2021, the EDCs will have only eight business days to reply to initial comments that interested participants will have had five weeks to develop. The same personnel within each EDC will be committed to preparing for and participating in the virtual technical conference on Thursday, June 3, 2021 and for developing the reply comments currently due on Friday, June 11, 2021.

5. To provide adequate time to respond to interested participants’ initial comments on the EDCs’ system planning analysis proposals, the Distribution Companies respectfully request a five day extension of the deadline to file their respective reply comments, to Wednesday, June 16, 2021.

6. No participant will be prejudiced by the proposed extension of the EDCs' deadline to file reply comments. National Grid, on behalf of all of the Distribution Companies, has conferred with the Attorney General's Office ("AGO"), the Department of Energy Resources ("DOER"), the Northeast Clean Energy Council ("NECEC"), and the Interstate Renewable Energy Council ("IREC") regarding this Motion for Extension. IREC has authorized the EDCs to represent that IREC supports the EDCs' request for an extension of the deadline to file reply comments from June 11 to June 16, 2021 and AGO, DOER and NECEC each has authorized the EDCs to represent that their organization has no objection to such request.

WHEREFORE, for the reasons set forth in this Motion for Extension of Time, the Distribution Companies respectfully requests that the Hearing Officer grant this Motion and approve their request for a five day extension of time to June 16, 2021 to submit their respective reply comments to interested participants' initial comments on the Distribution Companies' respective system planning analysis proposals.

Respectfully submitted,

**MASSACHUSETTS ELECTRIC COMPANY
AND NANTUCKET ELECTRIC COMPANY
each D/B/A NATIONAL GRID**

By their attorneys,



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**FITCHBURG GAS AND ELECTRIC LIGHT
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Date: May 10, 2021