

December 15, 2022

**By E-Filing**

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

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

Dear Secretary Marini:

On behalf of Massachusetts Electric Company and Nantucket Electric Company, each d/b/a National Grid (“National Grid”), enclosed for filing in the above matter is National Grid’s Motion for Extension of Time to file a Capital Investment Project (“CIP”) proposal for the Gardner-Winchendon 001 Group Study and a Certificate of Service.

Thank you for your attention to this matter. Please contact me if you have any questions regarding this filing.

Sincerely,



Nancy D. Israel, Esq.

Enclosures

cc: Katie Zilgme, Hearing Officer  
Katherine Stock, Hearing Officer  
Andrew Strumfels, Hearing Officer  
Kate S. Tohme, DG and Clean Energy Ombudsperson  
D.P.U. 20-75 Service List

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF PUBLIC UTILITIES**

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Investigation by the Department of Public Utilities )  
 On Its Own Motion Into Electric Distribution Companies' )  
 (1) Distributed Energy Resource Planning and ) D.P.U. 20-75  
 (2) Assignment and Recovery of Costs for the )  
 Interconnection of Distributed Generation )  
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**NATIONAL GRID MOTION FOR EXTENSION OF TIME**

Massachusetts Electric Company and Nantucket Electric Company, each d/b/a National Grid (“Company” or “National Grid”), pursuant to 220 C.M.R. 1.02(5), hereby requests an extension of time to file a Capital Investment Project (“CIP”) proposal for the Gardner-Winchendon 001 Group Study pursuant to the Order on Provisional System Planning Program (“Provisional Program Order”) issued by the Department of Public Utilities (“Department”) in the above referenced proceeding. For the reasons stated below, the Company has good cause to request an extension to file this CIP proposal.

The Provisional Program Order establishes a time limit of 40 business days from the Completion Date for a Distribution Company to file a CIP for Department review.<sup>1</sup> D.P.U. 20-75-B at 31. The Company notified the Department and the members of the Gardner-Winchendon 001 Group Study that the Completion Date for that Group Study was November 4, 2022. 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). The Company has good cause to request an extension to file the Gardner-Winchendon CIP

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<sup>1</sup> Capitalized terms that are not defined in this Motion are defined in D.P.U. 20-75-B.

proposal due to the end of year press of business and holiday schedules of key personnel and the fact that the same personnel also are engaged in developing additional CIP proposals to be filed in January 2023 pursuant to the Provisional Program Order and in preparing for January 2023 evidentiary hearings in D.P.U. 22-61 (Shutesbury CIP Proposal).

The Company respectfully requests a one-week extension to file the Gardner-Winchendon CIP proposal. This extension will result in moving the current deadline from Thursday, January 5, 2023, to Thursday, January 12, 2023.

The Company has conferred with counsel for the Attorney General's Office, counsel for the Department of Energy Resources and with the Northeast Clean Energy Council, all of whom have no objection to the Company's request for an extension.

WHEREFORE, for the foregoing reasons, the Company respectfully requests an extension of time to file a CIP proposal for the Gardner-Winchendon 001 Group Study.

Respectfully submitted,

**MASSACHUSETTS ELECTRIC COMPANY  
and NANTUCKET ELECTRIC COMPANY  
each d/b/a NATIONAL GRID**

By its attorneys,



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Nancy D. Israel, Esq.  
170 Data Drive  
Waltham, MA 02451  
(332) 201-1206

Dated: December 15, 2022

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF PUBLIC UTILITIES**

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D.P.U. 20-75

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day caused to be served the foregoing documents in the above-referenced docket upon all parties of record in this proceeding, in accordance with the requirements of 220 C.M.R. 1.05 (Department's Rules of Practice and Procedure), by electronic filing.

MASSACHUSETTS ELECTRIC COMPANY  
NANTUCKET ELECTRIC COMPANY EACH  
d/b/a NATIONAL GRID



Nancy D. Israel, Esq.  
170 Data Drive  
Waltham, MA 02451  
(332) 201-1206

Dated: December 15, 2022