

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES**

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)
)

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 Spencer-Rutland 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.¹ D.P.U. 20-75-B at 31. The Company notified the Department and the members of the Spencer-Rutland 001 Group Study that the Completion Date for that Group Study was November 23, 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 Spencer-Rutland CIP proposal

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

due to the fact that the same key personnel also are engaged in developing the Barre-Athol CIP proposal to be filed back-to-back with the Spencer-Rutland CIP proposal in January 2023 pursuant to the Provisional Program Order and in preparing for and participating in the January 2023 evidentiary hearings in D.P.U. 22-61 (Shutesbury CIP Proposal) immediately preceding the current filing dates of the two CIP proposals.

The Company respectfully requests a six business day extension to file the Spencer-Rutland CIP proposal. This extension will result in moving the current deadline from Tuesday, January 24, 2023, to Wednesday, February 1, 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 Spencer-Rutland 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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