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Jonathan Goldberg
Jonathan Goldberg,
August 4, 2015

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES

Massachusetts Electric Company and)
Nantucket Electric Company) D.P.U. 15-120
each d/b/a National Grid)
2015 Grid Modernization Plan)

Fitchburg Gas and Electric Light Company)
d/b/a Unitil) D.P.U. 15-121
2015 Grid Modernization Plan)

NSTAR Electric Company and)
Western Massachusetts Electric Company) D.P.U. 15-122/15-123
each d/b/a Eversource Energy)
2015 Grid Modernization Plan)

**MOTION FOR EXTENSION TO FILE
GRID MODERNIZATION PLANS**

Fitchburg Gas and Electric Light Company d/b/a Unitil (“Unitil”); Massachusetts Electric Company and Nantucket Electric Company each d/b/a National Grid (collectively “National Grid”); and NSTAR Electric Company and Western Massachusetts Electric Company each d/b/a Eversource Energy (collectively, the “Electric Companies”), pursuant to 220 C.M.R. 1.02(5), do hereby jointly petition the Department of Public Utilities (the “Department”) for a two-week extension in which to file their respective Grid Modernization Plans (“GMPs”) pursuant to the guidelines set forth following the Department’s Investigation by the Department of Public Utilities on its own Motion into Modernization of the Electric Grid, D.P.U. 12-76. Currently, the Electric Companies’ GMPs are to be filed on August 5, 2015. The Electric Companies’ proposed extension of the filing deadline to August 19, 2015 will allow each of the Electric

Companies to further refine and finalize their GMPs for the Department's and stakeholders' review.

Each of the Electric Companies were active participants in each stage of the D.P.U. 12-76 grid modernization investigation and are supportive of the Department's identified grid modernization objectives.¹ They have been diligently developing their respective GMPs since the issuance of the Department's Orders in D.P.U. 12-76-C and Time Varying Rates, D.P.U. 14-04-C to ensure that the GMPs are designed and ultimately implemented to advance the grid modernization objectives.² The requirement to develop comprehensive, forward-looking GMPs was the first of its kind. The GMPs encompass sophisticated and complex technological investment portfolios, along with proposals for the introduction of time varying rates. The Electric Companies' proposed two-week extension to file their respective GMPs will allow subject matter experts at each company additional time for further refinement of the plans and a final opportunity to review the GMPs in their entirety to ensure that each grid modernization objective has been addressed. This final period of refinement and review will ultimately benefit both the Department and stakeholders as they review the GMPs. The extension of the deadline to file the GMPs does not prejudice any party as the Electric Companies' individually docketed proceedings have not yet commenced.

In the interest of allowing for the final review and refinement of the GMPs, the Electric Companies respectfully request that the Department extend the deadline for filing from August 5, 2015 to August 19, 2015.

¹ The Department, with the support of the Electric Companies, set forth the following grid modernization objectives: (1) reducing the effects of outages; (2) optimizing demand, which includes reducing system and customer costs; (3) integrating distributed resources; and (4) improving workforce and asset management. D.P.U. 12-76-B, at 2.

² The Department required the Electric Companies to file their first GMPs within nine months of the later of (1) the Department's final Order in D.P.U. 14-04; and (2) the Department's final directive to companies regarding the presentation of their GMP business cases for capital expenditures. D.P.U. 12-76-B, at 5. The final Orders were issued on November 5, 2014.

Respectfully submitted,

**FITCHBURG GAS AND ELECTRIC
LIGHT COMPANY d/b/a UNITIL**

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**MASSACHUSETTS ELECTRIC COMPANY
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EACH D/B/A NATIONAL GRID**

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**NSTAR ELECTRIC COMPANY
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Dated: August 3, 2015