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**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 19-3272-PET

Petition of Vermont Department of Public)
Service to open a proceeding to initiate an)
EEU Demand Resource Plan proceeding for)
the 2021-2023 performance period)

MOTION FOR ENLARGEMENT OF TIME

NOW COMES City of Burlington Electric Department (“BED”), by and through its attorneys, McNeil, Leddy & Sheahan, P.C., and pursuant to Rule 6 of the Vermont Rules of Civil Procedure, made applicable to this proceeding by Rule 2.207 of the Commission’s Rules of Practice, hereby moves the Commission to enlarge the time by which BED must file its supplemental testimony in the above-captioned matter by three (3) business days, from March 19, 2021 to Wednesday, March 24, 2021. In support of this motion BED states as follows:

1. The Commission’s *Order Adopting Schedule for BED’s Amended Demand Resource Plan Proposal* in the above-captioned matter dated March 18, 2021, set March 19, 2021 as the date by which BED is to file supplemental testimony in support of its Amended Demand Resource Plan (“DRP”) proposal.
2. BED desires to share its supplemental testimony in support of its Amended DRP with the Department of Public Service (“Department”) for its input in advance of filing that testimony with the Commission.
3. BED will be sharing a draft of its supplemental testimony with the Department today, the same day the present schedule calls for the filing of that testimony with the Commission.

4. BED submits that enlarging the time by which it must file its supplemental testimony to March 24, 2021, should not impact the remainder of the Commission's schedule as the Department will be able to begin reviewing the draft testimony today.

5. Rule 6 provides that "[w]hen an act may or must be done within a specified time, the [Commission] may, for good cause, extend the time . . . if a request is made before the original time or its extension expires[.]" V.R.C.P. 6 (b)(1).

6. BED's need for an enlargement of time was not brought to the attention of the undersigned until today and, therefore, it was not possible to comply with the Commission's policy generally requiring the filing of a motion to enlarge three (3) days prior to the expiration of the deadline.

WHEREFORE, for good cause shown, BED respectfully requests that the Commission enlarge the date by which BED must file its supplemental testimony to March 24, 2021.

DATED at Burlington, Vermont this 19th day of March 2021.

McNEIL, LEDDY & SHEAHAN, P.C.

By: /s/ William F. Ellis
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