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January 30, 2020

Mark Marini, Secretary
Department of Public Utilities
One South Station, Fifth Floor
Boston, Mass. 02110

RE: D.P.U. 19-140, Investigation into Bay State Gas Company d/b/a Columbia Gas of Massachusetts' responsibility for and response to the September 13, 2018 Merrimack Valley Incident, and D.P.U. 19-141, Investigation into the Preparation and Response of Bay State Gas Company d/b/a Columbia Gas of Massachusetts with respect to the September 13, 2018 Merrimack Valley Gas Event □

Dear Secretary Marini,

Enclosed for filing is the Petition to Intervene in the above-captioned proceedings of the Low-Income Weatherization and Fuel Assistance Program Network (the Network). Also enclosed is my appearance in this proceeding.

Please let me know if there are questions about this filing.

Thank you.

Sincerely,

Copies:

DPU E-filing

Hearing Officer Laurie Weisman, Esq.

Shaela Collins, Esq., Susan Kullberg for Bay State Gas

Keegan Werlin (Cheryl Kimball, Esq., Brendan Vaughn, Esq.) for Bay State Gas

André Wright, Esq., NiSource

Office of the Attorney General (Elizabeth Mahoney, Esq., Matthew Saunders, Esq. *et al.*)

Rachel Evans, Esq., Department of Energy Resources

Joey Lee Miranda, Esq. for Direct Energy

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES**

D.P.U. 19-140

Investigation into Bay State Gas Company d/b/a.
Columbia Gas of Massachusetts' responsibility for
and response to the September 13, 2018
Merrimack Valley Incident.

D.P.U. 19-141

Investigation into the Preparation and Response of
Bay State Gas Company d/b/a Columbia Gas of
Massachusetts with respect to the September 13, 2018
Merrimack Valley Gas Event.

**PETITION TO INTERVENE OF
LOW-INCOME WEATHERIZATION AND FUEL ASSISTANCE PROGRAM
NETWORK**

1. This is the Petition to Intervene in this docket, pursuant to 220 CMR 1.03, of the Low-Income Weatherization and Fuel Assistance Program Network (the Network). It requests that the Network be granted intervenor status in the above-captioned proceedings, in which the Department is investigating a Gas Event in Merrimack Valley on September 13, 2018 (the Incident).
2. As the only representative of the low-income customer sector in this proceeding, the Network is in unique possession of information that can help inform the Department's deliberations in these proceedings. Low-income consumers have been adversely affected by the Incident and are finding it increasingly difficult to afford their energy bills due to both (a) volatile but generally increasing energy prices and (b) the general economic uncertainty, which includes decreasing public benefits, uncertain incomes, and increasing general prices.

3. Petitioner possesses relevant and material information regarding the subject matter of these dockets, including direct experience of low-income customers and members of the Network.

Petitioner's participation in these dockets will therefore materially assist the Department in its investigation and determinations herein by providing information about the situation of low-income customers, including consequences of the Incident.

4. G.L. c. 25, sec. 19(c) (Green Communities Act, St. 2008, c. 169, sec. 11) provides that “The low-income residential demand side management and education programs shall be implemented through the low-income weatherization and fuel assistance program network and shall be coordinated with all electric and gas distribution companies in the commonwealth with the objective of standardizing implementation.” The Network is the organization of agencies that make up the low-income weatherization and fuel assistance program network that implement programs under the Act.

5. Among many other services, 7Members of the Network counsel customers of the Company about rates and payment options, and arrange rate payment assistance (including LIHEAP, arrearage management, and other forms of assistance).

6. Petitioner is thus substantially affected by this proceeding because the efficiency, weatherization, education, assistance, and counseling services they (or their members) offer are dependent on or affected by the outcome of this investigation. Petitioner is also substantially affected by this proceeding because its clients (or those of the Network's members) depend on the aforementioned efficiency, weatherization, education, assistance, and counseling services, which may be determined or affected by this investigation. Further, Petitioner and its clients are substantially affected by interruption of gas service, including safety and communication related thereto, and by needs for assistance to clients without gas service.

8. Petitioner may seek to file oral and/or documentary evidence on the topics described above. Relief sought would include mitigation of adverse impacts on low-income customers of the Company,

and such other relief as the Commission determines to be just and proper.

WHEREFORE, the Low-Income Weatherization and Fuel Assistance Program Network, including its member agencies, respectfully request intervenor status in this Docket.

Respectfully submitted,
The Low-Income Weatherization and Fuel Assistance Program Network
c/o Action Energy, 47 Washington St., Gloucester,

By its attorney,

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Gloucester, Mass. 01930
978-283-0897
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Dated: January 30, 2020

**THE COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES**

D.P.U. 19-140

Investigation into Bay State Gas Company d/b/a.
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Massachusetts with respect to the September 13, 2018
Merrimack Valley Gas Event.

APPEARANCE OF COUNSEL

In the above-entitled proceedings, I hereby appear for and on behalf of Low-Income Weatherization
and Fuel Assistance Program Network.

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Dated: January 30, 2020