

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES**

Columbia Gas of Massachusetts' responsibility for and response to the September 13, 2018 Merrimack Valley Incident))))))	DPU 19-140
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**PETITION TO INTERVENE
BY THE
MASSACHUSETTS DEPARTMENT OF ENERGY RESOURCES**

Pursuant to 220 C.M.R. § 1.03, the Department of Energy Resources of the Commonwealth of Massachusetts ("DOER") hereby petitions for leave to intervene in the above-captioned proceeding. In support of its request, DOER states the following:

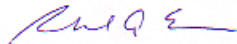
1. On October 25, 2019, the Department of Public Utilities ("Department") voted to open two investigations into an over-pressurization event resulting in a series of explosions and fires in the natural gas distribution system of Bay State Gas Company d/b/a Columbia Gas of Massachusetts ("Bay State" or "Company") on September 13, 2018. This investigation in D.P.U. 19-140 will focus on Bay State's responsibility for the September 13 Event as well as its restoration efforts following the incident, pursuant to the Department's general supervisory authority over natural gas distribution companies, G.L. c. 164, § 76, as well as its authority pursuant to 49 U.S.C. § 60105, G.L. c. 164, § 105A, and 220 CMR 69.00 to investigate a natural gas distribution company's compliance with federal and state pipeline safety laws and regulations, particularly 49 C.F.R. Part 192, 220 CMR 101.00, and 220 CMR 107.00.
2. DOER is the Massachusetts executive agency responsible for establishing and implementing the Commonwealth's energy policies and programs, generally. (M.G.L. c. 25A, § 6).
3. Pursuant to M.G.L. c. 25A, § 6, DOER is authorized and directed to:
 - (1) plan, develop, oversee, and operate programs to help consumers understand, evaluate, and select retail energy supplies and related services offered as a consequence of electricity and gas utility restructuring;
 - (2) develop and administer programs relating to energy conservation, demand-side management, alternative energy development, non-renewable energy supply and resources development, energy bond authority, energy information and energy emergencies;

- (3) advise, assist, and cooperate with other state, local, regional, and federal agencies in developing appropriate program and policies relating to energy planning and regulation in the Commonwealth;
 - (4) develop energy data and information management capabilities to aid energy planning and decision-making; and
 - (5) promote the development of sound energy education programs.
4. DOER's ability to develop and implement consistent governmental policies with respect to the Commonwealth's energy programs will be substantially and specifically affected by this proceeding.
 5. Therefore, DOER requests the right to participate in all aspects of this case, including, as it deems necessary, the presentation of testimony, cross-examination of witnesses, and the presentation of arguments orally and through briefs.

Respectfully submitted,

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF ENERGY RESOURCES

By its attorney:



Rachel Graham Evans
Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114
Tel. (617) 626-7326

DATE: February 4, 2020

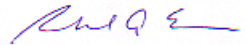
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APPEARANCES OF COUNSEL

Please enter our appearances on behalf of the Massachusetts Department of Energy Resources in this proceeding.

Respectfully submitted,

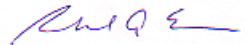


Rachel Graham Evans, Deputy General Counsel
Robert Hoaglund, General Counsel
Stephen Bright, Legal Counsel
Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

February 4, 2020

Certificate of Service

I hereby certify that I have this day served the foregoing documents upon all parties of record in this proceeding in accordance with the requirements of 220 CMR 1.05(1).



Rachel Graham Evans