



THE COMMONWEALTH OF MASSACHUSETTS  
OFFICE OF THE ATTORNEY GENERAL  
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March 12, 2020

Mark D. Marini, Secretary  
Department of Public Utilities  
One South Station, 5<sup>th</sup> Floor  
Boston, MA 02110

**Re: Bay State Gas Company d/b/a Columbia Gas of Massachusetts, D.P.U. 19-140**

Dear Secretary Marini:

Enclosed please find the Attorney General's Notice of Intervention and Certificate of Service. Please file according to your usual practice. Thank you for your assistance in this matter.

Sincerely,

*/s/ Matthew E. Saunders*

Matthew E. Saunders  
Assistant Attorney General

Enclosures

cc: Laurie E. Weisman, Esq., Hearing Officer  
Service List

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF PUBLIC UTILITIES**

**Bay State Gas Company d/b/a Columbia Gas  
of Massachusetts**

**D.P.U. 19-140**

**ATTORNEY GENERAL'S NOTICE OF INTERVENTION**

Maura Healey, as she is the Attorney General of the Commonwealth of Massachusetts, hereby gives notice of intervention as of right in the above-captioned matter under the authority specifically granted her by M.G.L. c. 12, §§10 and 11E and under her common law authority to represent and protect the public interest.

The Attorney General, as the chief law enforcement officer of the Commonwealth, has “broad common law and statutory powers to represent the public interest.” *Commonwealth v. Mass CRINC*, 392 Mass. 79, 88 (1984); *see Sec’y of Admin. and Fin. v. Attorney General*, 367 Mass. 154, 159 (1975), *quoting Commonwealth v. Kozłowsky*, 238 Mass. 379, 389 (1921). “[T]he Attorney General has a general statutory mandate, in addition to any specific statutory mandate, to protect the public interest.” *Mass CRINC*, 392 Mass. at 88, *citing* G.L. c. 12, § 10; *see also Lowell Gas Co. v. Attorney General*, 377 Mass. 37, 48 (1979) (holding that the Attorney General has a “common law duty to represent the public interest and to enforce public rights.”). The Attorney General’s authority to protect the public interest applies to this administrative proceeding, as the Legislature did not intend “to vary the power and duty of the Attorney General to control the conduct of litigation involving the interests of the Commonwealth depending on the forum in which he appears.” *Feeney v. Commonwealth*, 373 Mass. 359, 367 (1998). The Attorney General’s Office’s interpretation of its own authority should be given the same significant

deference of any administrative agency in carrying out a power granted by the legislature. *Dowling v. Registrar of Motor Vehicles*, 425 Mass. 523, 525 (1997), quoting *Mass. Med. Soc. v. Comm'r of Ins.*, 402 Mass. 44, 62 (1988).

Respectfully submitted,

MAURA HEALEY  
ATTORNEY GENERAL

By: /s/ Matthew E. Saunders  
Matthew E. Saunders  
Assistant Attorney General  
Massachusetts Attorney General  
Office of Ratepayer Advocacy  
One Ashburton Place  
Boston, MA 02108  
(617) 727-2200

Dated: March 12, 2020

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF PUBLIC UTILITIES**

**Bay State Gas Company d/b/a Columbia Gas  
of Massachusetts**

**D.P.U. 19-140**

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all parties of record in this proceeding in accordance with the requirements of 220 C.M.R. 1.05(1) (Department's Rules of Practice and Procedure). Dated at Boston this 12th day of March 2020.

*/s/ Matthew E. Saunders*  
Matthew E. Saunders  
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Massachusetts Attorney General  
Office of Ratepayer Advocacy  
One Ashburton Place  
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