

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES

Petition of Bay State Gas Company d/b/a
Columbia Gas for Approval of a Firm
Transportation Agreement with Tennessee
Pipeline Company, LLC, Pursuant to
G.L. c. 164, § 94A

D.P.U. 15-39

**PETITION FOR LEAVE TO INTERVENE
OF NORTHEAST ENERGY SOLUTIONS, INC.**

Northeast Energy Solutions, Inc. (“NEES”) hereby petitions the Department of Public Utilities (the “Department”) for leave to intervene as a full participant, pursuant to 220 C.M.R. 1.03, in the Petition for Approval of Firm Transportation Contract with Tennessee Gas Pipeline Company, LLC (“TGP”) filed by Bay State Gas Company d/b/a Columbia Gas (“Columbia”). In support of its petition, NEES hereby states as follows:

1. NEES, is a not-for-profit corporation comprised of stakeholders, including conservation land owners, who are committed to investigating and providing sound and thorough energy infrastructure analysis and advocacy regarding the economics and routing of energy transportation projects in the Northeastern United States. NEES is concerned about the effect of energy infrastructure development as it relates to economic vitality and environmental impacts in the Northeast. NEES’ mission is to thoroughly analyze and advocate responsible energy infrastructure development by means of public education and formal advocacy. NEES’s principal place of business is:

Northeast Energy Solutions, Inc.
292 Main Street, Suite 14
Great Barrington, Massachusetts 01230

2. On April 3, 2015, Columbia filed a Petition for Approval of Firm Transportation Contract with Tennessee Pipeline Company, LLC requesting the Department's approval of a precedent agreement for a 20 year firm transportation contract between Columbia and TGP (the "Proposed Agreement") to provide transportation service on the Northeast Energy Direct Project ("NED"), a proposed expansion of TGP's pipeline system.
3. The Department docketed this proceeding as D.P.U. 15-39 and issued a Notice of Filing and Public Hearing on April 14, 2015 which notice allowed for interested persons to petition for leave to participate by May 5, 2015.
4. The Department may "allow any person showing that he may be substantially and specifically affected by the proceeding to intervene as a party in the whole or any portion of the proceeding, and allow any other interested person to participate by presentation of argument orally or in writing, or for any other limited purpose." G.L. c. 30A, § 10(4); see 220 C.M.R. § 1.03(1).
5. The Department's consideration of the Proposed Agreement will directly affect prices and consumption of natural gas, and could set precedent for the use of ratepayer resources to achieve energy policy objectives, and impact efforts to ensure the efficient use of energy and energy infrastructure directly and substantially impacting NEES and its members. Moreover, the Department's consideration of the Proposed Agreement could impact proceedings with respect to the approval of NED, along with related matters before the Federal Energy

Regulatory Commission and the U.S. Department of Energy to which NEES is an active party or anticipates to be an active party, and as a result, the proceedings with respect to the Proposed Agreement substantially affect the interests of NEES and its members.


6. The interests of NEES and its members are unique and cannot be adequately represented by any other party to this proceeding.
7. NEES intends to participate actively in this proceeding in the manner deemed appropriate by the Hearing Officer through the presentation of evidence and testimony.
8. For the purposes of adding NEES to the Department's service list and the service list of the parties, information and documents related to this proceeding may be sent to:

Northeast Energy Solutions, Inc.
c/o Vincent DeVito, Esq.
Bowditch & Dewey, LLP
1 International Place, 44th Floor
(617) 757-6518
vdevito@bowditch.com

WHEREFORE, Northeast Energy Solutions, Inc. respectfully requests that the Massachusetts Department of Public Utilities grant it intervenor status with the rights to participate in the proceeding fully as a party thereto, or, in the alternative, to participate in the proceeding as a limited participant thereto.

Respectfully Submitted,

NORTHEAST ENERGY SOLUTIONS, INC.

A handwritten signature in black ink that reads "V-A DeVito". The signature is written in a cursive style with some capitalization. It is positioned above a horizontal line.

BY: Vincent DeVito, Esq.
Bowditch & Dewey, LLP
1 International Place, 44th Floor
Boston, Massachusetts 02110
(617) 757-6518
vdevito@bowditch.com

Dated: May 5, 2015

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_____)

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APPEARANCE OF COUNSEL

In the above captioned proceeding, I hereby appear for and on behalf of Northeast Energy Solutions, Inc.

Respectfully Submitted,



Vincent DeVito, Esq.
Bowditch & Dewey, LLP
1 International Place, 44th Floor
Boston, Massachusetts 02110
(617) 757-6518
vdevito@bowditch.com

Dated: May 5, 2015

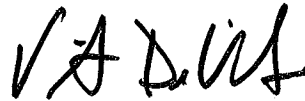
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CERTIFICATE OF SERVICE

I hereby Certify that I have this day served the foregoing document upon the persons on the Service List in the above captioned proceeding in the manner required by the Department of Public Utilities' Rules of Practice and Procedure.



Vincent DeVito, Esq.
Bowditch & Dewey, LLP
1 International Place, 44th Floor
Boston, Massachusetts 02110
(617) 757-6518
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Dated: May 5, 2015