



THE COMMONWEALTH OF MASSACHUSETTS  
OFFICE OF THE ATTORNEY GENERAL  
ONE ASHBURTON PLACE  
BOSTON, MASSACHUSETTS 02108

ANDREA JOY CAMPBELL  
ATTORNEY GENERAL

(617) 727-2200  
[www.mass.gov/ago](http://www.mass.gov/ago)

March 9, 2026

Peter A. Ray, Secretary  
Department of Public Utilities  
One South Station, 3<sup>rd</sup> Floor  
Boston, MA 02110

Ursula Estremera, Secretary  
Department of Telecommunications and Cable  
Federal Street, Suite 0740  
Boston, MA 02110

**Re: *Joint Investigation by the Department of Public Utilities and the Department of Telecommunications and Cable on their own motion instituting a rulemaking pursuant to G.L. c. 30A, § 2, 220 CMR 2.00, and 207 CMR 2.00, to amend 220 CMR 45.00: Pole Attachment, Duct, Conduit, and Right-of-Way Complaint and Enforcement Procedures, D.P.U. 26-10/D.T.C. 26-1***

Dear Secretary Ray and Secretary Estremera:

Enclosed for filing please find the Office of the Attorney General's Notice of Intervention, Appearance of Counsel, and Certificate of Service in the above-referenced dockets. Please file according to your usual practice.

The Office of the Attorney General ("AGO") also respectfully requests that Jennifer Foley be added to the official service lists of this proceeding. Jennifer Foley provides essential legal support services to the AGO on many matters, including the instant proceeding, and her inclusion on the official service list will reduce the administrative burden of keeping this proceeding organized. As such, we request that the Department grant an exception to 220 CMR 1.05(1)(b) and include Jennifer Foley ([Jennifer.Foley3@mass.gov](mailto:Jennifer.Foley3@mass.gov)) on the official service list for D.P.U. 26-10/D.T.C. 26-1.

Thank you for your assistance in this matter.

Sincerely,

/s/ Julian Aris

Julian Aris

Assistant Attorney General

Enclosures

cc: Kerri Phillips, Hearing Officer  
Scott Seigal, Hearing Officer  
William Bendetson, Hearing Officer  
Kevin Roberts, Hearing Officer  
Service Lists

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF PUBLIC UTILITIES**

**Joint Investigation by the Department of Public Utilities and the Department of Telecommunications and Cable on their own motion instituting a rulemaking pursuant to G.L. c. 30A, § 2, 220 CMR 2.00, and 207 CMR 2.00, to amend 220 CMR 45.00: Pole Attachment, Duct, Conduit, and Right-of-Way Complaint and Enforcement Procedures**

**D.P.U. 26-10/D.T.C. 26-1**

**ATTORNEY GENERAL'S NOTICE OF INTERVENTION**

Andrea Joy Campbell, 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 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. & Fin. v. Attorney General*, 367 Mass. 154, 159 (1975) (quoting *Commonwealth v. Kozlowsky*, 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,

ANDREA JOY CAMPBELL  
ATTORNEY GENERAL

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

Dated: March 9, 2026

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DEPARTMENT OF PUBLIC UTILITIES

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**D.P.U. 26-10/D.T.C. 26-1**

**APPEARANCE OF COUNSEL**

Please enter my appearance on behalf of Andrea Joy Campbell, the Attorney General of the Commonwealth of Massachusetts, in the above captioned proceeding.

Respectfully submitted,

ANDREA JOY CAMPBELL  
ATTORNEY GENERAL

By: /s/ Julian Aris  
Julian Aris  
Assistant Attorney General  
Massachusetts Attorney General  
Office of Ratepayer Advocacy  
One Ashburton Place  
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**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 C.M.R. 1.05(1) (Department's Rules of Practice and Procedure). Dated at Boston this 9<sup>th</sup> day of March, 2026.

/s/ Julian Aris  
Julian Aris  
Assistant Attorney General  
Massachusetts Attorney General  
Office of Ratepayer Advocacy  
One Ashburton Place  
Boston, MA 02108  
(617) 727-2200