

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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VERIZON NEW ENGLAND) D.T.E. 01-31

d/b/a Verizon Massachusetts)

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**PETITION FOR LIMITED PARTICIPANT STATUS OF
BOSTON GAS COMPANY
d/b/a/ KEYSPAN ENERGY DELIVERY NEW ENGLAND**

Pursuant to 220 C.M.R. 1.03, Boston Gas Company d/b/a KeySpan Energy Delivery New England ("KeySpan") hereby petitions the Department of Telecommunications and Energy ("Department") for leave to participate as a limited participant in the above-captioned proceeding. In support of its request, KeySpan states the following:

1. KeySpan is a Massachusetts corporation located at One Beacon Street, Boston, MA 02108.
2. KeySpan is a gas company, as defined in G.L. c. 164, § 1, and is regulated by the Department, pursuant to G.L. c. 164.
3. On February 27, 2001 the Department opened an investigation into the appropriate regulatory plan to succeed the current price cap regulation plan for Verizon New England, Inc. d/b/a Verizon Massachusetts ("Verizon") approved in NYNEX; D.P.U. 94-50 (1995). KeySpan was a limited participant in that docket.
4. Included among the items the Department intends to review are: (i) a component for regulating or deregulating retail prices; (ii) a plan for regulating service quality; and (iii) a plan for intrastate access charge reform.

5. KeySpan's rates and operations are currently subject to a performance based regulation plan ("PBR") approved by the Department in Boston Gas Company; D.P.U. 96-50 (1996).

6. The KeySpan PBR includes a component for regulating service quality.

7. KeySpan is a party to the Department's current investigation intended to establish guidelines for service quality standards for electric distribution companies and local gas distribution companies D.T.E. 99-84.

8. The Department's investigation into the Verizon price cap regulation plan may specifically and substantially affect the interests of KeySpan.

9. KeySpan's interests are unique and can not be adequately represented by any other party.

10. KeySpan seeks to participate as a limited participant in this case, and where appropriate, to file comments, attend and participate in technical conferences, submit briefs, and to participate in this proceeding in any other manner deemed appropriate for limited participants by the Hearing Officer.

WHEREFORE, KeySpan respectfully requests that the Department grant its Petition for Limited Participant status.

Respectfully submitted,

Thomas P. O'Neill, Counsel

Boston Gas Company

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Dated: April 17, 2001