

**In the Matter of the Application of CP  
Crane LLC for a Certificate of Public  
Convenience and Necessity  
Authorizing the Modification of the  
Charles P. Crane Generating Station  
in Baltimore County, Maryland**

**BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF MARYLAND**

**Case No. 9482**

---

**PETITION OF BLUE WATER BALTIMORE, THE GUNPOWDER  
RIVERKEEPER, AND THE ESSEX-MIDDLE RIVER CIVIC COUNCIL  
FOR LEAVE TO INTERVENE**

Petitioners, Blue Water Baltimore, Gunpowder RIVERKEEPER®, and the Essex-Middle River Civic Council (“The Parties”), requests leave to intervene in the above-captioned proceeding, and, as grounds therefore, states as follows:

1. Blue Water Baltimore is non-profit organization dedicated to limiting water pollution and restoring the quality of Baltimore’s rivers, streams, and the Baltimore Harbor, and represents over 800 members, many of whom live, work, and recreate in the Patapsco River watershed. The Gunpowder RIVERKEEPER® is an advocacy-based membership 501(c)(3) nonprofit organization that works with local communities for the purpose of protecting, conserving, and restoring the Gunpowder River and its watersheds. Gunpowder Riverkeeper has commented on water discharge permits at the Crane Station since 2011. The Essex-Middle River Civic Council is an umbrella organization of some 20 community associations and civic organizations that has been in existence since 1960. The Council works for the betterment of the Essex and Middle River areas and focuses on issues of area-wide and multi-community significance.

2. In its Application, CP Crane LLC (“Applicant”) is seeking a Certificate of Public Convenience and Necessity authorizing the modification of its existing Charles P.

Crane Generating Station (“Crane Station”) whereby the existing two coal-fired generating units would be permanently retired, and three combustion turbines fired primarily with natural gas would be installed and operated (“Repowering Project”). This generating station is located at the end of small peninsula into the Gunpowder River and the Chesapeake Bay. The Parties represent members who live, work, and recreate in the tidal Gunpowder and Patapsco Rivers, on the Chesapeake Bay, and near the Crane Station. The operation of Crane Station causes considerable impacts to the air and water quality of the surrounding waters and lands. The Parties and their member’s interests may be harmed by the continued operation of Crane Station.

3. Pursuant to authority set forth in § 7-205 of the *Maryland Annotated Code*, Public Utilities Article, and Code of Maryland Regulations (“COMAR”) 20.79.02.03, the Maryland Public Service Commission established a proceeding to address the Application of CP Crane LLC for a Certificate of Public Convenience and Necessity Authorizing the Modification of the Charles P. Crane Generating Station in Baltimore County, Maryland.

4. Pursuant to § 3-106 of the *Maryland Annotated Code*, Public Utilities Article, The Parties hereby seeks leave to intervene in this proceeding.

5. The Parties will be affected by and have a direct interest in the outcome of this proceeding and its interests are not adequately represented by any other party to this proceeding.

6. For purposes of serving all documents filed in this proceeding, the Parties designate:

Patrick F. DeArmey  
Staff Attorney  
Environmental Action Center  
27 Wood Lane – 2<sup>nd</sup> Floor  
Rockville, MD 20850  
Telephone: 410-236-9552  
Email: Patrick.dearmey@environmentalactioncenter.org

WHEREFORE, the Parties request that the Commission grant it leave to intervene as parties to this proceeding.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Patrick DeArmey', written over a horizontal line.

Patrick F. DeArmey  
Staff Attorney  
Environmental Action Center  
27 Wood Lane – 2<sup>nd</sup> Floor  
Rockville, MD 20850  
Telephone: 410-236-9552  
Email: Patrick.dearmey@environmentalactioncenter.org

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 29th day of June 2018, a copy of the foregoing Petition of the Parties for Leave to Intervene was served by electronic mail to all parties listed on the official service list in this proceeding.

A handwritten signature in black ink, appearing to read "Patrick F. DeArmey", is written over a horizontal line.

Patrick F. DeArmey