

July 26, 2018

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Kristin Case Lawrence
Maryland Public Service Commission
William Donald Schaefer Tower
6 St. Paul Street, 19th Floor
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Re: Case No. 9482 -- Notice of Intent to Cure Deficiency

Dear Judge Lawrence:

This letter is in response to your July 18, 2018 Notice of Completeness Determination. In that Notice, the PULJ Division acknowledged the application and stated that the application is deficient for the reasons set forth by the Department of Natural Resources, Power Plant Research Program ("PPRP") and the Maryland Department of the Environment Air and Radiation Management Administration ("MDE-ARA"). The Notice instructs Applicant to provide notice of its intent to cure the deficiency and the date by which it intends to cure the deficiency.

On July 10, 2018, PPRP and MDE-ARA filed a letter indicating that they have conducted an initial review of the C.P. Crane LLC ("CP Crane") Certificate of Public Convenience and Necessity ("CPCN") Application filed on May 31, 2018 in Case No. 9482. PPRP and MDE-ARA state that they have determined from their initial review that the CPCN application is administratively incomplete.¹

Since receiving the administrative completeness review letter and Data Request No. 1-1, CP Crane has been in contact with PPRP and MDE-ARA to resolve this issue.

¹ PPRP and MDE-ARA stated that the Application is administratively incomplete for the following reason:

CP Crane did not provide emissions guarantees from the vendor for the emissions units and controls associated with the GE LM6000 CTs, specifically the advanced combustion design and water injection associated with the CTs. PPRP and MDE-ARA cannot complete the review of the CPCN application without vendor specifications, including manufacturer guaranteed emissions factors. COMAR 26.11.02.01B(13) defines a complete application as an application that contains all the information required by MDE-ARA, in sufficient detail, to allow MDE-ARA to begin review of the application, including but not limited to purchase specifications for equipment, equipment drawings and literature, and air pollution control equipment vendor guarantees and equipment literature.

The timely and complete submission of the information outlined herein, which will be detailed in DNR Data Request No. 1 is critical for the State to complete its environmental review of the project.

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CP Crane had included the vendor's² emission performance data for the combustion turbines in Appendix B to Appendix C (Air Construction Permit Application) of the Environmental Review Document portion of the application. Emissions performance data obtained from ProEnergy appears in the tables following the "Emissions Calculations" tab.

However, since the submission of the CPCN application, CP Crane has been informed by ProEnergy that they will be providing an update to the emissions performance data for the combustion turbines. As a result, CP Crane will need to revise its application. As part of this revision, CP Crane will re-submit ProEnergy's emissions performance data for the combustion turbines.³

CP Crane is working to revise its application as quickly as possible and has targeted August 31, 2018, for filing the revised application and a supplemental response to PPRP Data Request 1-1.

Please do not hesitate to contact me at 410-244-7755 if you have any questions regarding the issues described above.

Respectfully submitted,



Diana M. Krevor
Counsel for C.P. Crane LLC

cc: service list, case no. 9482

² For clarification, the proposed turbines are GE LM-6000s, but the vendor/supplier for these turbines is ProEnergy. Since these turbines are used equipment that will be rebuilt/refurbished by ProEnergy, all supporting information will be provided by ProEnergy.

³ On July 19, 2018, CP Crane informed PPRP and MDE-ARA in a conference call that it would be receiving updated vendor specifications from ProEnergy and that the application, including emissions data and calculations, would be revised.