

Diana M. Krevor

T (410) 244-7755
F (410) 244-7742
dmkrevor@venable.com

August 31, 2018

Terry J. Romine
Maryland Public Service Commission
William Donald Schaefer Tower
6 St. Paul Street, 16th Floor
Baltimore, Maryland 21202

Re: Case No. 9482, In the Matter of the Application of C.P. Crane LLC for a Certificate of Public Convenience and Necessity Authorizing the Modification of the Charles P. Crane Generating Station in Baltimore County, Maryland – SECOND SUPPLEMENT TO APPLICATION

Dear Ms. Romine:

On May 31, 2018, C.P. Crane LLC (“CP Crane” or “Applicant”) filed an Application for a Certificate of Public Convenience and Necessity (“CPCN Application”) authorizing the modification of the CP Crane Generating Station in Baltimore County, Maryland. The Application included an Environmental Review Document and Air Construction Permit Application.¹

On July 18, 2018, Public Utility Law Judge Kristin Case Lawrence issued a Notice of Completeness Determination stating 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”). In a letter dated July 10, 2018, PPRP and MDE-ARA stated that the Application is administratively incomplete because Applicant did not provide emissions guarantees from the vendor for the emissions units and controls associated with the GE LM6000 combustion turbines.²

On July 26, 2018, Applicant notified the Public Utility Law Judge Division of its intent to cure the deficiency by re-submitting emissions performance data for the combustion turbines received from its vendor, ProEnergy Services (“ProEnergy”). At that time, ProEnergy informed Applicant that they were preparing an update to the emissions performance data that they had provided previously. Applicant received ProEnergy’s updated emissions performance data earlier this month and it appears in Appendix B to Appendix C (Air Construction Permit Application) of the revised Environmental Review Document.

¹ On June 21, 2018, CP Crane filed a supplement to its May 31, 2018 Application which included revised pages of the Environmental Review Document and Air Construction Permit Application. See Maillog No. 221010.

² See Maillog No. 221229.

Terry J. Romine
August 31, 2018
Page 2


Therefore, the purpose of today's filing is twofold: (1) to cure the deficiency identified by PPRP and MDE-ARA in their July 10, 2018 Administrative Completeness Review Letter through submission of ProEnergy's updated emissions performance data and performance guarantees; and (2) to incorporate ProEnergy's updated performance data into the Environmental Review Document, including a fully revised and updated Air Construction Permit Application.

Enclosed please find an original and seventeen (17) copies of the following:

- (1) Errata to the CPCN Application filed on May 31, 2018 (including clean and redline versions);
- (2) Errata to the Direct Testimony of David R. Dunbar filed on May 31, 2018 (including clean and redline versions);
- (3) Second Errata to the Direct Testimony of Thomas O. Pritcher filed on June 12, 2018 (including clean and redline versions); and
- (4) Revisions to the following sections of the Environmental Review Document portion of the Application to reflect ProEnergy's updated emissions performance data:
 - a. Section 3.0 Project Description -- completely replaces original (35 pages),
 - b. Section 5.0 Effect of Project Operation -- pages 5-1 to 5-4 only (4 pages),
 - c. Appendix C Air Construction Permit Application -- completely replaces original, including appendices (154 pages).

The materials for the Environmental Review Document have been three-hole punched for convenience, so that they may be added to the original volume if so desired. If you have any questions or concerns, please do not hesitate to contact me.

Very truly yours,


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

Enclosures
cc: Service List