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April 1, 2019

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VIA E-FILE AND HAND DELIVERY

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The Honorable Kristin Case Lawrence
Public Utility Law Judge Division
Maryland Public Service Commission
William Donald Schaefer Tower
6 St. Paul Street, 19th Floor
Baltimore, MD 21202

Re: PSC 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

Dear Judge Lawrence:

C.P. Crane LLC ("CP Crane") has reviewed the Direct Testimony of Baltimore Gas and Electric Company ("BGE") witness David C. Smith filed on March 4, 2019. BGE has reviewed the Rebuttal Testimony of CP Crane witness Dennis C. Corn filed on March 18, 2019. CP Crane and BGE have conferred in an effort to resolve differences between the positions set forth in the testimonies of Mr. Smith and Mr. Corn. As a result of this effort, CP Crane and BGE have agreed to the following proposed condition describing their commitment to enter into a written agreement regarding BGE's delivery of natural gas to the Charles P. Crane Generating Facility Repowering Project:

Prior to the commencement of operations, CP Crane shall enter into a binding written agreement with Baltimore Gas and Electric Company ("BGE") regarding the delivery by BGE of natural gas to the Charles P. Crane Generating Facility Repowering Project ("CP Crane Project") and the operations at the CP Crane Project in a manner to ensure the safety and reliability of the BGE natural gas distribution system. Consistent with the conditions of BGE's December 2018 natural gas load study, and subject to the items below, the agreement shall include the following: (i) the approved natural gas load, (ii) the applicable BGE gas service rate schedule, (iii) communication protocols describing how the CP Crane Project will communicate with BGE, (iv) any limitations on natural gas load during certain time periods, (v) CP Crane's responsibilities regarding acquisition and arrangement of gas supply and transport to BGE's city gate, (vi) information on how the CP Crane Project will operate to ensure BGE's existing gas infrastructure maintains adequate pressure and reliability, and (vii) a commitment by CP Crane to adhere to and be subject to the terms and conditions contained in any future BGE natural gas tariff designed for electric generation customers that is approved by the Maryland Public Service Commission. Prior to the execution of the agreement, BGE will determine whether each of the stated items is acceptable and sufficient to ensure the safe and reliable operation of the BGE natural gas distribution system. The agreement shall be consistent with BGE's obligations under Md. Code Ann. Pub. Util. § 5-303.

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Therefore, CP Crane and BGE recommend the incorporation of the above proposed condition into the Certificate of Public Convenience and Necessity in lieu of the recommended condition initially set forth in Confidential Company Exhibit DCS-1 attached to the Direct Testimony of Mr. Smith. As a result of this resolution, CP Crane does not have any cross examination for BGE witness David C. Smith. I am authorized to state on behalf of BGE that BGE does not have any cross examination for Applicant witness Dennis C. Corn. Both Mr. Smith and Mr. Corn are available to attend the evidentiary hearing on April 4, 2019 to answer any questions regarding the proposed condition.

Please do not hesitate to contact me should you have any questions and/or concerns in regards to this matter.

Very truly yours,



Diana M. Krevor
Counsel to CP Crane LLC

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cc: Service List