

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF MARYLAND**

**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**

\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*

Case No. \_\_\_\_\_

\* \* \* \* \*

**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**

Pursuant to § 7-205 of the Public Utilities Article (“PUA”) of the Annotated Code of Maryland and Title 20, Subtitle 79 of the Code of Maryland Regulations (“COMAR”), C.P. Crane, LLC (the “Applicant”) respectfully requests that the Maryland Public Service Commission (“Commission”) grant the Applicant a Certificate of Public Convenience and Necessity (“CPCN”) authorizing it to modify the existing Charles P. Crane Generating Station (“Crane”) in Baltimore County, Maryland, to enable the use of natural gas in the existing Unit 2 at Crane.

This Application is comprised of this petition together with the attached Environmental Review Document (“ERD”), the Direct Testimony of John Forbes, and the Direct Testimony of Louis A. Corio. Section I of this petition describes the Applicant; Section II provides an overview of the Project; and Section III provides the information required by the Public Utilities Article and the Commission’s regulations.

The Applicant respectfully requests a procedural schedule permitting review and issuance of an order on its Application by the end of 2016 in order to facilitate construction by early-April 2017. This would permit the Project to be in service for the Summer 2017 season.

**I. The Applicant**

The Applicant is located at 1001 Carroll Island Road, Baltimore, Maryland 21220, and is a wholly-owned subsidiary of Avenue Capital Group. Crane is operated by PurEnergy Operating Services LLC.

**II. The Project**

Crane includes two coal-fired electric generating units, which are the main electric generating units at the facility: Unit 1 and Unit 2. Today, both Unit 1 and Unit 2 are coal-fired. With this application, Crane is proposing to modify Unit 2 to enable it to use natural gas for electric generation, whether by itself or in combination with coal (the "Project"). The Project will allow Crane to reduce its ozone-season (summer) emissions while maintaining electric generating capacity, reduce usage of high-maintenance coal and ash handling systems, reduce ash disposal requirements, and shorten Unit 2's start-up time. The work comprising the Project will take place within the existing footprint of Crane. A description of planned Project activities is provided in Chapter 3 of the attached ERD. As described in the ERD, the Project will have minimal impacts, and will actually reduce emission rates and mass emissions of most pollutants.

**III. Application Requirements**

In conformance with the provisions of COMAR 20.79.01.04 (Application Filing Requirements) and 20.79.03.01 (Description of Generating Station), the Applicant hereby states as follows:

- A. The name of the Applicant is C.P. Crane LLC.

B. The address of the principal business office of the Applicant is 1001 Carroll Island Road, Baltimore, Maryland 21220.

C. The following persons are authorized to receive notices and communications with respect to the Application:

F. William DuBois  
Venable LLP  
750 East Pratt St., Suite 900  
Baltimore, MD 21202  
wdubois@venable.com

John Forbes  
C.P. Crane LLC  
1001 Carroll Island Road  
Baltimore, Maryland 21220  
jforbes@cpcranepower.com

D. A copy of the Application is being made available for public inspection and copying at the Essex Branch of the Baltimore County Public Library, 1110 Eastern Boulevard, Baltimore, Maryland 21221.

E. A list of each local, state, and federal government agency having authority to approve or disapprove the construction or operation of the Project is set forth in the ERD.

F. Not applicable.

G. A general description of the generating station, consistent with COMAR 20.79.03.01, is provided in Chapters 1 and 2 of the ERD.

H. The Applicant seeks to begin actual, on-site construction by early-April 2017. In order to facilitate that schedule, the Applicant seeks an order on this Application by February 2017, to permit it to engage in procurement activities subsequent to the order but in time for the targeted construction date. This schedule would permit the Project to be in service for the Summer 2017 season. Additional details concerning construction are provided in the ERD.

I. The environmental information required by COMAR 20.79.03.02 is provided in the ERD.

**IV. Conclusion**

The Applicant has provided the information above, in the attached ERD, and in the testimony of Messrs. Forbes and Corio in support of its application. The Project offers environmental benefits and will have a positive impact on the stability and reliability of the electrical system. The Applicant respectfully requests an expeditious review of this Application and issuance of a final order on the Application by the end of 2016.

June 24, 2016

Respectfully submitted,



---

F. William DuBois  
Venable LLP  
750 E. Pratt St., Suite 900  
Baltimore, Maryland 21202  
(410) 244-5467  
wdubois@venable.com

*Counsel for C.P. Crane LLC*

**CERTIFICATE OF SERVICE**

On this 24th day of June, 2016, copies of the foregoing Application for Certificate of Public Convenience and Necessity were sent to the below-listed agencies in accordance with COMAR 20.79.02.02:

1 copy to:

Kevin B. Kamenetz  
Baltimore County Executive  
400 Washington Avenue  
Towson, MD 21204

1 copy to:

W. Carl Richards, Jr.  
Chief, Baltimore County Zoning Review  
111 West Chesapeake Avenue, Room 111  
Towson, Maryland 21204

1 copy to:

Vicki Almond  
Chair, Baltimore County Council  
400 Washington Avenue  
Towson, Maryland 21204

1 copy to:

Andrea Van Arsdale  
Director, Baltimore County Department of Planning  
105 West Chesapeake Avenue  
Towson, Maryland 21204

4 copies to:

Benjamin H. Grumbles, Secretary  
Maryland Department of the Environment  
Montgomery Park Business Center  
1800 Washington Blvd.  
Baltimore, MD 21230

1 copy to:

David R. Craig, Secretary  
Maryland Department of Planning  
301 W. Preston Street  
Baltimore, MD 21201-2365

6 copies to:

Mark J. Belton, Secretary  
Maryland Department of Natural Resources  
Tawes State Office Building, C4  
580 Taylor Avenue  
Annapolis, MD 21401

1 copy to:

Penny Pritzker, Secretary  
U.S. Department of Commerce  
1401 Constitution Ave., NW  
Washington, D.C. 20230

1 copy to:

R. Michael Gill, Secretary  
Maryland Department of Commerce  
World Trade Center  
401 East Pratt Street  
Baltimore, MD 21202-3316

1 copy to:

Pete K. Rahn, Secretary  
Maryland Department of Transportation  
P.O. Box 548  
7201 Corporate Center Drive  
Hanover, MD 21076-0548

1 copy to:

Ricky D. Smith, Sr., Executive Director  
Maryland Aviation Administration  
P.O. Box 8766  
Third Floor, Terminal Building, 3<sup>rd</sup> Floor  
BWI Airport, MD 21240-8766

1 copy to:

Gregory C. Johnson, Administrator  
State Highway Administration  
Maryland Department of Transportation  
707 North Calvert Street  
Baltimore, MD 21202

1 copy to:

Sally Jewell, Secretary  
U.S. Department of the Interior  
1849 C Street NW  
Mail Stop 7229  
Washington, DC 20240

1 copy to:  
Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426

1 copy to:  
Michael P. Huerta, Administrator  
Orville Wright Bldg. (F0B10A)  
Federal Aviation Administration National Headquarters  
800 Independence Avenue, SW  
Washington, DC 20591

1 copy to:  
Mary Beth Tung, Esq., Ph.D., Director  
Maryland Energy Administration  
1800 Washington Blvd., Suite 755  
Baltimore, MD 21230

1 copy to:  
Paula M. Carmody, Esquire  
Office of People's Counsel  
William Donald Schaefer Tower  
6 St. Paul Street, Suite 2102  
Baltimore, MD 21202

1 copy to:  
Daniel M. Ashe, Director  
U.S. Fish & Wildlife Service  
Main Interior  
1849 C Street NW, Room 3331  
Washington, DC 20240-0001

1 copy to:  
Calvin G. Butler, Jr.  
Chief Executive Officer  
Baltimore Gas and Electric Company  
2 Center Plaza  
110 W. Fayette Street  
Baltimore, MD 21201



---

F. William DuBois