



Margaret Comes
Associate Counsel
Law Department

April 18, 2018

VIA EMAIL

The Honorable James Richard Perry
Secretary of Energy
U.S. Department of Energy
1000 Independence Ave., S.W.
Washington, DC 20585

Bruce Walker
Assistant Secretary,
U.S. Department of Energy
Office of Electric Delivery and Energy Reliability
1000 Independence Ave., S.W.
Washington, DC 20585

Catherine Jereza
Deputy Assistant Secretary
U.S. Department of Energy
Office of Electricity Delivery and Energy Reliability
1000 Independence Ave., S.W.
Washington, DC 20585

RE: First Energy Solutions Corp. March 29, 2018 Request for Emergency Order
Motion to Intervene of Rockland Electric Company

Dear Secretary Perry, Assistant Secretary Walker, and Deputy Assistant Secretary Jereza:

On April 10, 2018, Rockland Electric Company (“Rockland”) submitted a letter and Motion to Intervene in the above matter. Subsequently, the Department of Energy established the email address AskOE@hq.doe.gov for the receipt of materials related to Federal Power Act section 202(c).

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Accordingly, Rockland is submitting the April 10 cover letter and Motion to Intervene to the AskOE@hq.doe.gov email address. The April 10 cover letter and Motion to Intervene are attached below as Exhibit A.

Respectfully submitted,


Margaret Comes

c: William S. Scherman, Esq.
Rick C. Giannantonio, Esq.

EXHIBIT A



Margaret Comes
Associate Counsel
Law Department

April 10, 2018

VIA OVERNIGHT MAIL AND EMAIL

The Honorable James Richard Perry
Secretary of Energy
U.S. Department of Energy
1000 Independence Ave., S.W.
Washington, DC 20585

Bruce Walker
Assistant Secretary,
U.S. Department of Energy
Office of Electric Delivery and Energy Reliability
1000 Independence Ave., S.W.
Washington, DC 20585

Catherine Jereza
Deputy Assistant Secretary
U.S. Department of Energy
Office of Electricity Delivery and Energy Reliability
1000 Independence Ave., S.W.
Washington, DC 20585

RE: First Energy Solutions Corp. March 29, 2018 Request for Emergency Order
Motion to Intervene of Rockland Electric Company

Dear Secretary Perry, Assistant Secretary Walker, and Deputy Assistant Secretary Jereza:

Enclosed is Rockland Electric Company (“Rockland”) Motion to Intervene in the above proceeding concerning First Energy Solutions Corp.'s March 29, 2018 (“FES”) Request For Emergency Action (“Request”). Rockland is a public utility serving approximately seventy-two thousand retail electric customers in New Jersey who will be affected by the FES request.

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Rockland also is a member of PJM Interconnection LLC which will be affected by the FES request. If the Request is not denied outright, Rockland requests that interested parties be given 60 days to file comments.

Respectfully submitted,


Margaret Comes

enc.

c: William S. Scherman, Esq.
Rick C. Giannantonio, Esq.

UNITED STATES OF AMERICA BEFORE THE
DEPARTMENT OF ENERGY

The Request for Emergency Order of)
First Energy Solutions Corp. dated) DOE Docket No. _____
March 29, 2018)

MOTION TO INTERVENE

Rockland Electric Company (“Rockland”) hereby moves to intervene in the above-captioned proceeding.

I. PROCEDURAL BACKGROUND

On March 29, 2018, First Energy Solutions Corp. (FES) issued a letter request to the Honorable James Richard Perry, Secretary of Energy, requesting that the Secretary use emergency authority under Section 202(c) of the Federal Power Act to find that an emergency condition exists in the PJM Interconnection, L.L.C. (PJM) territory requiring immediate intervention. Specifically, FES requested that the Secretary (a) order "certain existing nuclear and coal-fired generators ... to enter into contracts" with PJM to generate and transmit energy, capacity, and ancillary services to " maintain the stability of the electric grid" and (b) order PJM to "promptly compensate at-risk merchant nuclear and coal-fired power plants for the full benefits they provide" to energy markets and the public.

II. MOTION TO INTERVENE

Rockland is a public utility engaged in the transmission and distribution of electricity in New Jersey, and serves approximately 72,000 retail electric customers in New Jersey. Rockland Electric owns transmission facilities in PJM Interconnection, L.L.C. (“PJM”) and is a member of PJM. Rockland and its customers will be directly affected by the outcome of these proceedings, and its interests cannot be represented adequately by any other party.

III. NOTICES AND CORRESPONDENCE

All communications, pleadings and orders with respect to this proceeding should be sent to the following individuals:

Brian Wilkie
Energy Policy and Regulatory Affairs
Rockland Electric Company
4 Irving Place
Room 17-430
New York, New York 10003
Telephone: (212) 460-4517
Facsimile: (212) 228-4072
e-mail: wilkieb@coned.com

Margaret Comes
Law Department
Rockland Electric Company
4 Irving Place
Room 1815-S
New York, New York 10003
Telephone: (212) 460-3013
Facsimile: (212) 677-5850
e-mail: comesm@coned.com

IV. CONCLUSION

Rockland Electric Company respectfully requests that the Department of Energy accept this motion permitting Rockland Electric Company to intervene in the above proceeding.

Dated: April 10, 2018
New York, New York

Respectfully submitted,

ROCKLAND ELECTRIC COMPANY

By: Margaret Comes
Margaret Comes
Associate Counsel
Rockland Electric Company
4 Irving Place
Room 1815-S
New York, New York 10003

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document on the William S. Scherman, Esq., Rick C. Giannantonio, Esq. and other parties to this proceeding.

Dated at New York, New York this April 10, 2018.

A handwritten signature in cursive script that reads "Margaret Comes" is written over a solid horizontal line.

Margaret Comes