

Request for Party Status

Case Number: 16-F-0559

Case Title: Application of Bluestone Wind, LLC for a Certificate of Environmental Compatibility and Public Need Pursuant to Article 10 for Construction of the Bluestone Wind Farm Project Located in the Towns of Windsor and Sanford, Broome County.

Name: George Flugrad

Firm or Organization: Millennium Pipeline Company, LLC

Postal Address: One Blue Hill Plaza #1565

Email ID: flugrad@millenniumpipeline.com

Appear on behalf of: Millennium Pipeline Company, LLC

Reason: Millennium Pipeline Company, LLC ("MPC") moves to request party status in this proceeding initiated by Bluestone Wind, LLC ("Bluestone"). Bluestone submitted an application authorizing Bluestone to construct and operate its Bluestone wind project. Bluestone's proposed facility crosses Millennium's Right of Way and the proposed construction corridor directly impacts the natural gas transportation and transmission pipeline which MPC operates. MPC therefore has a direct and substantial interest in the outcome of this proceeding. Other participants in this proceeding may take positions on the issues that support their specific interest, and those positions may differ from the positions MPC may take. Therefore, MPC will be affected directly by the outcome of this proceeding and its interest in this proceeding cannot be adequately represented by any other entity. MPC agrees to accept the record as it now stands, and no other party will be harmed by this late request of party status. MPC respectfully requests that the Commission grant this request to have party status in this proceeding with all rights of a party.

I understand that by submitting this form, I consent to serve other parties electronically and to receive service from other parties electronically except as otherwise directed by the presiding officer.

Name: George Flugrad

Date: 11/2/2018 4:46 PM