BEFORE THE
PUBLIC SERVICE COMMISSION OF MARYLAND

IN THE MATTER OF THE
APPLICATIONS OF US WIND, INC. AND
SKIPJACK OFFSHORE WIND, LLC FOR
A PROPOSED OFFSHORE WIND
PROJECT(S) PURSUANT TO THE
MARYLAND OFFSHORE WIND
ENERGY ACT OF 2013

) ) ) ) Case No. 9431

PETITION TO INTERVENE OF
CHESAPEAKE PHYSICIANS FOR SOCIAL RESPONSIBILITY

Pursuant to Maryland Code, Public Utilities, § 3-106, Chesapeake Physicians for Social Responsibility respectfully petitions to intervene in the above-captioned proceeding.

The Maryland Offshore Wind Energy Act of 2013 ("Act") established a number of provisions to incentivize the development of a qualified offshore wind project. Among other provisions, the Act created a carve-out for offshore wind energy in Maryland’s Renewable Energy Portfolio Standard for up to 2.5% of total retail electricity sales. The Act also required that the offshore wind project calculate each proposed offshore wind project’s net benefits to the State, including an analysis of the anticipated environmental benefits, health benefits, and environmental impacts of the offshore wind project to the citizens of the state.

As of November 18, 2016, applications were submitted for two offshore wind projects by US Wind, Inc. and Skipjack Offshore Energy, LLC. On November 22, 2016, by Order No. 87898, the Commission commenced this docketed proceeding to conduct a
multi-part review to evaluate and compare the proposed offshore wind project applications. The Commission also directed that Petitions to Intervene shall be filed by December 12, 2016. This Petition to Intervene is thus timely filed.

In support of this Petition to Intervene, Chesapeake Physicians for Social Responsibility states the following:

1. Chesapeake Physicians for Social Responsibility, by and through their members, have a substantial interest in this proceeding. Because of its characteristics of availability and reliability, offshore wind has the potential to play a major role in helping Maryland build a modern clean energy economy. Transitioning to more renewable energy will mean cleaner air and better health for Marylanders. Offshore wind will help move Maryland away from carbon- and smog-producing energy sources, with the potential to make measurable and predictable reductions in premature mortality and save millions of dollars in health costs. However, the public versions of both proposed projects do not offer specific information on the analysis of the health benefits as required by the Act. Chesapeake Physicians for Social Responsibility and/or their members are ratepayers in Maryland who would be impacted by the Commission’s consideration of these applications.

Chesapeake Physicians for Social Responsibility, in our capacity as an organization and/or in representative capacities on behalf of their members, are retail electric customers in Maryland. Our organization includes members of the medical, public health, and scientific community of Maryland who have
interest in and substantial knowledge of the health aspects of energy production.

a. Physicians for Social Responsibility was started in the 1960s to address the threat to human health posed by nuclear weapons. It won the Nobel Peace Prize in 1986 for its part in that work. In the 1990s, PSR also began addressing climate disruption, another threat to health worldwide. Chesapeake Physicians for Social Responsibility works to safeguard the health of Marylanders through: reducing exposure to health-harming toxic substances such as pesticides, lead, and carcinogens; reducing pollution of Maryland's air and water; working with state and local government, communities, businesses, and private citizens to understand, mitigate, and respond to the public health threats of climate change; promote positive development to move Maryland toward a sustainable clean energy economy; and, assure that all Marylanders benefit equally from these activities.

2. This case presents an important opportunity to deliver the health benefits of clean energy. As part of our continuing efforts to address the health threats associated with both polluting sources of energy production and the carbon-driven public health effects climate change, to which Maryland is specifically vulnerable, Chesapeake Physicians for Social Responsibility intends to participate to ensure that 1) the health effects of either proposal are estimated and evaluated in a scientifically valid way, 2) these health effects are taken into consideration along with other economic, development, ratepayer, and
electricity distribution factors in decisions regarding award of renewable energy credits, and 3) through this process, Maryland residents receive the greatest possible health benefits from its development of offshore wind energy.

3. Chesapeake Physicians for Social Responsibility is well situated to represent the interests of their members in this proceeding as a result of their medical, scientific, and professional expertise and experience in public health and in energy- and climate-related health policy and law, our ongoing engagement in policy, regulatory, and legal processes that draw on this expertise. No other party can adequately represent Chesapeake Physicians for Social Responsibility and their member ratepayers, who have an interest in receiving affordable and efficient electricity that also addresses their public health and environmental concerns.

4. Chesapeake Physicians for Social Responsibility plan to raise issues that are relevant and material to this proceeding. The participation of Chesapeake Physicians for Social Responsibility will help develop a thorough record, determine the issues to be decided, and stimulate disclosure of information regarding the impacts of each project upon the health of Maryland ratepayers. Chesapeake Physicians for Social Responsibility may provide evidence that will assist the Commission in determining whether to approve either of the proposed projects. As participants in this proceeding, Chesapeake Physicians for Social Responsibility may seek information or present evidence on the impact of either project upon public health.
5. If this Petition to Intervene is granted, Chesapeake Physicians for Social Responsibility may elect to participate in these proceedings through testimony, at hearing, or by filing. Chesapeake Physicians for Social Responsibility may advocate positions related to the design, implementation, and operation of the project. However, this Petition to Intervene should not be interpreted as Chesapeake Physicians for Social Responsibility’s adoption of any position regarding either proposed project.

6. Timothy Whitehouse, Esq., will serve as lead counsel of record for Chesapeake Physicians for Social Responsibility. Chesapeake Physicians for Social Responsibility request that copies of all pleadings, filings and official correspondence in this case be addressed to:

    Timothy Whitehouse, Esq.
    (240) 246-4492
twhitehouse@psr.org

Wherefore, for the reasons stated above, Chesapeake Physicians for Social Responsibility respectfully requests that the Commission grant Chesapeake Physicians for Social Responsibility permission to intervene in this proceeding.

Respectfully submitted,

[Signature]

Timothy Whitehouse, Esq.
Executive Director
Chesapeake Physicians for Social Responsibility
17207 Lightfoot Lane
Poolesville MD 21218
(240) 246-4492
twhitehouse@psr.org

Date: 12/10/2016
Notice of Appearance

Chesapeake Physicians for Social Responsibility request that the Maryland Public Service Commission enter the appearance of Timothy Whitehouse, Esq., who is admitted to practice law in the State of Maryland, as Counsel in the above-captioned proceeding. Mr. Whitehouse is designated as the attorney to receive service on behalf of Chesapeake Physicians for Social Responsibility.

[Signature]

Timothy Whitehouse, Esq.
Executive Director
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Poolesville, MD 21218
(240) 246-4492
twhitehouse@psr.org

Date: 12/10/2016
CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of December 2016, I electronically filed a copy of this Petition to Intervene in PSC Case No. 9431 with the Maryland Public Service Commission. In addition, the original, signed Petition to Intervene, as well as 17 copies, were delivered by hand on the 12th day of December 2016 to David J. Collins, Executive Secretary, Maryland Public Service Commission, William Donald Schaefer Tower, 16th Floor, 6 St. Paul St., Baltimore, Maryland, 21202.

Timothy Whitehouse, Esq.
Executive Director
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