

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 18-0974-TF

Tariff Filing of Green Mountain Power requesting an)
increase in its base rates starting January 1, 2019, to be)
fully offset by bill credits through September 30, 2019)

GLOBALFOUNDRIES U.S. 2 LLC’S MOTION TO INTERVENE

NOW COMES Globalfoundries U.S. 2 LLC (“Globalfoundries”) and moves, pursuant to Rule 2.209(B) of the Vermont Public Utility Commission (“PUC”) Rules, to be permitted to intervene in the above-captioned proceeding. Grounds for this motion are as follows:

1. On April 13, 2018, Green Mountain Power Corporation (“GMP”) filed a cost of service and revised tariff (the “Tariff Filing”) with PUC reflecting a proposed base rate increase of 5.45% and requested that the rates approved by PUC become effective on January 1, 2019.

2. Globalfoundries is a business electricity customer in Vermont. Electricity costs represent a significant portion of Globalfoundries’ total operating costs. Moreover, reliable delivery of electricity is critical to Globalfoundries’ operations. For these reasons, Globalfoundries has a direct interest in ensuring that rates and reliability in Vermont are not affected adversely by the proposals advanced in this docket, and has substantial interests at issue in this proceeding.

3. The interests of Globalfoundries are not otherwise exclusively represented in this proceeding. Although the Vermont Department of Public Service represents the general interests of the consuming public, the specific and unique interests of Globalfoundries may diverge, and sometimes have diverged, from the Department’s broad mandate. Thus, Globalfoundries’ interests are not and could not be adequately represented by any other party.

4. There are no alternative means by which Gobalfoundries' interests can be protected.

5. The intervention of Globalfoundries will not unduly delay the proceeding or prejudice the interests of existing parties or the public.

WHEREFORE, Globalfoundries respectfully requests PUC grant Globalfoundries party status to participate in this proceeding.

Dated at Burlington, Vermont this 4th day of May 2018.

DINSE, KNAPP & McANDREW, P.C.

By /s/ Shapleigh Smith, Jr.

Shapleigh Smith, Jr., Esq.

Justin B. Barnard, Esq.

Kendall A. Hoechst, Esq.

209 Battery Street

Burlington, VT 05401

(802) 864-5751

ssmith@dinse.com

jbarnard@dinse.com

khoechst@dinse.com

Counsel for Globalfoundries U.S. 2 LLC