

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 18-1633-PET

Petition of Green Mountain Power Corporation)
for approval of a multi-year regulation plan)
pursuant to 30 V.S.A § 209, 218, and 218d)

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 June 4, 2018, Green Mountain Power Corporation (“GMP”) filed petition for approval of a multi-year regulation plan pursuant to 30 V.S.A. § 209, 218, and 218d.

2. GLOBALFOUNDRIES is a business electricity customer in Vermont. Electricity costs represent a significant portion of GLOBALFOUNDRIES’ total operating costs, and 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 GLOBALFOUNDRIES' 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 that the PUC grant GLOBALFOUNDRIES party status to participate in this proceeding.

Dated at Burlington, Vermont this 24th day of July, 2018.

DINSE, KNAPP & McANDREW, P.C.

By /s/ Justin B. Barnard

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