

October 3, 2017

VIA ELECTRONIC FILING

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
Office of the Secretary
888 First Street, N.E.
Washington, D.C. 20426

RE: Save the Mousam: Keep the Kennebunk Dams, LLC P-14855-000
America First Hydro LLC P-14856-000

Dear Ms. Bose:

Enclosed please find for filing the Motion to Intervene of Kennebunk Light and Power District in the above captioned dockets.

Thank you for your attention to this matter.

Regards,



Todd J. Griset
Counsel to Kennebunk Light and Power District

cc: Electronic Service List

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

**Save the Mousam: Keep the Kennebunk Dams, LLC
America First Hydro LLC**

**P-14855-000
P-14856-000**

**MOTION TO INTERVENE OF
KENNEBUNK LIGHT AND POWER DISTRICT**

Pursuant to 18 C.F.R. § 385.214(d) of the Rules of the Federal Energy Regulatory Commission (“FERC”), Kennebunk Light and Power District (the “District”) moves to intervene in the above-captioned proceedings, or in the alternative notes its intent to participate in these proceedings consistent with Commission rules and practices.

The District is a consumer-owned not for profit electric distribution company, formed in 1951 when the residents of the Town of Kennebunk approved the charter for the District’s formation under a special and private act of the Maine State Legislature. The District is the licensee for the existing Lower Mousam Project, Project No. P-5362 (the “Project”). On March 29, 2017, the District filed a notice of intent pursuant to 18 C.F.R. § 5.5 expressing its intention not to file an application for a subsequent license for the Lower Mousam Project.

On September 8, 2017, Save the Mousam: Keep the Kennebunk Dams, LLC filed in Docket No. P-5362 materials it described as a “Notice of Intent, Pre-Application Document and TLP Request” for the Project. The Commission subsequently opened a new docket, P-14855, with respect to that filing by Save the Mousam: Keep the Kennebunk Dams, LLC.

On September 12, 2017, America First Hydro LLC filed in Docket No. P-5362 materials it described as a “Notice of Intent, Pre-Application Document and TLP Request” for the Project. The Commission subsequently opened a new docket, P-14856, with respect to that filing by America First Hydro LLC.

As the current licensee for and owner of the Project, as well as in its role as the public utility to which the Project’s generation is interconnected, the District has or represents an interest which may be directly affected by the outcome of these proceedings, including without limitations its interests as a present or potential consumer, customer, or competitor. For these reasons, the District’s participation in these dockets is in the public interest.

The District is mindful of Rule 214 of the Commission’s Rules of Practice and Procedure, as well as of the Commission’s precedent dismissing motions to intervene filed while

a proceeding is in the pre-application phase.¹ To the extent that the Commission entertains motions to intervene in the above-captioned dockets, the District respectfully moves to intervene in those dockets as described in this filing. Alternatively, to the extent that the Commission declines at this time to entertain motions to intervene in the above-captioned dockets, the District notes its intent to participate in these dockets consistent with Commission rules and practices.

WHEREFORE, Kennebunk Light and Power District respectfully moves to intervene in those dockets as described in this filing, or (to the extent that the Commission declines at this time to entertain motions to intervene in the above-captioned dockets) notes its intent to participate in these dockets consistent with Commission rules and practices.

Respectfully submitted,



Todd J. Griset
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¹ See, e.g., *New Summit Hydro, LLC*, P-14612-002, Notice Dismissing Motion to Intervene (February 15, 2017); *New York State Electric & Gas Corporation*, P-2934-028, Notice Dismissing Motion to Intervene (May 24, 2016).