

**IN THE UNITED STATES COURT OF APPEALS  
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

NRG Power Marketing, LLC,	)	
Petitioner,	)	
	)	
v.	)	Nos. 15-1452 and 15-1454
	)	(Consolidated)
Federal Energy Regulatory Commission,	)	
Respondent.	)	

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**MOTION TO INTERVENE OF  
THE NATIONAL RURAL ELECTRIC COOPERATIVE ASSOCIATION**

Pursuant to Rule 15(d) of the Federal Rules of Appellate Procedure and Local Appellate Rule 15, the National Rural Electric Cooperative Association (NRECA) hereby moves for leave to intervene in the above captioned proceeding as an intervenor in support of the Respondent the Federal Energy Regulatory Commission.

NRECA states as follows:

Petitioners NRG Power Marketing LLC and PJM Power Providers Group seek review of the following orders issued by Respondent Federal Energy Regulatory Commission (“Commission”):

1. *PJM Interconnection, L.L.C.*, Docket No. ER13-535-000, “Order Conditionally Accepting In Part, and Rejecting In Part, Proposed Tariff Provisions, Subject to Conditions,” 143 FERC ¶ 61,090 (May 2, 2013); and

2. *PJM Interconnection, L.L.C.*, Docket No. ER13-535-000, ER13-535-001, ER13-535-002, ER13-535-003, “Order on Rehearing and Compliance,” 153 FERC ¶ 61,066 (October 15, 2015)

NRECA was an intervenor in the aforementioned proceeding.

NRECA is the national service organization for more than 900 not-for-profit rural electric utilities that provide electric energy to approximately 42 million people in 47 states, or approximately 12 percent of electric customers. Rural electric cooperative infrastructure covers 75% of the land mass of the United States. Rural electric cooperatives are private, non-profit entities that are owned and governed by the members to whom they deliver electricity. They were formed to provide safe, reliable electric service to their member-owners at the lowest reasonable cost.

NRECA was a party in the aforementioned FERC proceeding and has a substantial interest in this proceeding that cannot be adequately represented by another party to the proceeding.

NRECA will support the Respondent Federal Energy Regulatory Commission.

WHEREFORE, NRECA respectfully moves the Court for leave to intervene in this proceeding with the right to participate fully in all aspects of the proceeding.

Respectfully submitted,

*/s/ Adrienne E. Clair*

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*Counsel for the National Rural Electric  
Cooperative Association*

Dated: January 13, 2016

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**CORPORATE DISCLOSURE STATEMENT OF  
THE NATIONAL RURAL ELECTRIC COOPERATIVE ASSOCIATION**

Pursuant to Rule 26.1 of the Federal Rules of Appellate Procedure and Circuit Rule 26.1, the National Rural Electric Cooperative Association (NRECA) states as follows:

NRECA is the national service organization for more than 900 not-for-profit rural electric utilities that provide electric energy to approximately 42 million people in 47 states, or approximately 12 percent of electric customers. NRECA does not have any parent companies, and no publicly-held company has a 10 percent or greater ownership interest in NRECA. NRECA does not issue stock.

Respectfully submitted,

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Dated: January 13, 2016

## CERTIFICATE OF SERVICE

In accordance with Fed. R. App. P. 25(d), I hereby certify that I have this 13<sup>th</sup> day of January, 2016, caused the foregoing document to be served on all parties or their counsel of record through the CM/ECF system, if they are registered users or, if they are not, by serving a true and correct copy at the addresses listed below:

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