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and

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2. This motion is brought within the deadline to seek intervention established in the Commission's Order Directing Notice, Setting Intervention Deadline issued on November 27, 2017.
3. Wind on the Wires do not yet have a position on the proposals and analysis within the tariff filing and supporting testimony. Wind on the Wires reserves the right to take a position on specific issues as this case proceeds.
4. No other party or entity interested in this proceeding can adequately represent the interests of the Wind on the Wires because their interest differs from those of the general public and other intervenors.
5. Wind on the Wires intervention will serve the public interest by assisting the development of a full and complete record for the PSC's decision in this case.

Wherefore, Wind on the Wires seek an order granting intervention and the opportunity to provide additional information which will serve the public interest.

Respectfully submitted,

/s/ Deirdre K. Hirner
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Attorney for Wind on the Wires

CERTIFICATE OF SERVICE

The undersigned certifies that this Motion was electronically served upon all parties to this case on December 11, 2017.

/s/ Deirdre K. Hirner

Attorney for Wind on the Wires