

CCG and CNE are indirect, wholly-owned subsidiaries of Constellation Energy Group, Inc., (“CEG”) a FORTUNE 125 North American energy company with several merchant subsidiaries in addition to CCG and CNE, including a regulated utility subsidiary, Baltimore Gas and Electric Company.

CCG is a power marketer authorized by the Federal Energy Regulatory Commission (“FERC” or “Commission”) to sell energy and capacity and certain ancillary services at market-based rates.¹ CCG focuses on serving the full requirements power needs of distribution utilities, co-ops and municipalities that competitively source their load requirements. CCG also sells natural gas and other commodities at wholesale, both in the United States and abroad, and holds interests in exploration and production companies. CCG does not own any physical assets for the generation, transmission, or distribution of electric power and has no retail electric customers or service territories.

CNE is a retail electricity supplier that provides customized energy solutions and comprehensive energy services to commercial and industrial customers. CNE has been certified to act as a competitive retail electric supplier to serve customers located within various service territories throughout the United States and Canada, and has been granted market-based rate authority by the Commission.² Nationwide, CNE has over 15,000 MW of load under contract with over 10,000 retail customers.

II. BACKGROUND

On January 30, 2008, the Bonneville Power Administration (“BPA” or “Administration”) issued a notice of a public hearing and opportunity for public review

¹ See *Constellation Power Source, Inc.*, 79 FERC ¶ 61,167 (1997) (order initially granting CCG market-based rate authority).

² See *NEV, L.L.C.*, 81 FERC ¶ 61,186 (1997) (order initially granting CNE market-based rate authority).

and comment on the Administration's proposal to adopt a rate for Wind Integration – Within-Hour Balancing Service. According to the Administration, the Wind Integration—Within-Hour Balancing Service Rate will ensure that these costs are borne by the parties causing the costs.

III. MOTION TO INTERVENE

As active participants in BPA, the CEG Companies have unique interests in this proceeding that cannot be adequately represented by another party. As a result, the CEG Companies have interests that may be directly affected by the outcome of these proceedings. The CEG Companies recognize that a need exists for products and services that allow wind generators and their customers who buy the power output from wind generation to manage the risks associated with integrating and balancing wind generation. Therefore, the development of a Wind Integration – Within Hour Balancing Service Rate is an important proceeding that will impact how CCG serves its customers. In particular, the calculation and implementation of any wind integration rate will directly impact a number of transactions currently being negotiated by CCG. Similarly, as a supplier of retail energy to direct end use customers, and subject to requirements to purchase specific quantities of renewable energy, CNE is also potentially impacted by BPA's Wind Integration – Within Hour Balancing Service Rate. Therefore, the CEG Companies should be permitted to intervene and participate in these proceedings.

V. CONCLUSION

WHEREFORE, the CEG Companies respectfully request that the Administration grant their motion to intervene and designate CCG and CNE as parties to this proceeding, with all the rights appropriate to that status.

Respectfully submitted,

/s/ Cynthia A. Fonner

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*On behalf of Constellation Energy Commodities
Group, Inc. and Constellation NewEnergy, Inc.*

February 13, 2008

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have served on this 13th day of February, 2008 the foregoing document in accordance with the requirements of the Administration's Rules of Procedure Governing Rate Hearings.

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