

**In the matter of the application of
Unistar Nuclear Energy, LLC and
Unistar Nuclear Operating Services, LLC
for a Certificate of Public Convenience and
Necessity to construct a nuclear power plant
at Calvert Cliffs in Calvert County, Maryland**

* BEFORE THE
*
* PUBLIC SERVICE COMMISSION
*
* OF MARYLAND
*
* Case No: 9127
*

* * * * *

Petition to Intervene

The Maryland Public Interest Research Group (Maryland PIRG) and the Nuclear Information and Research Service (NIRS) move to intervene in the above-described matter and in support state:

1. Maryland PIRG is a statewide, non-profit, non-partisan organization that advocates on behalf of its membership and in the public interest on issues concerning environmental protection, consumer rights, and the democratic process. Maryland PIRG has approximately 12,000 members throughout Maryland. Maryland PIRG represents its members who, as residential electrical consumers and environmentally conscious citizens, are interested and directly impacted by the proposal to construct a nuclear power plant.

2. NIRS is an information and networking center for citizens and environmental organizations concerned about nuclear power, radioactive waste, radiation, and sustainable energy issues. As a Maryland-based organization, NIRS has a special interest in Maryland energy policy, nuclear power, radioactive waste and sustainable energy issues in Maryland.

3. Participation by Maryland PIRG and NIRS in this proceeding is in the public interest, and the particular interests of Maryland PIRG and NIRS will not be adequately represented by

any other party to this proceeding. No party is prejudiced or otherwise disadvantaged by allowing Maryland PIRG and NIRS to participate in this matter.

4. Communications and correspondence should be addressed to undersigned counsel.

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Wherefore, Maryland PIRG and NIRS respectfully request that they be allowed to intervene and participate as parties in this case.

Respectfully Submitted,

/s/

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