

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

**Strom, Inc.**

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**Docket No. CP14-121-000**

**MOTION OF PIVOTAL LNG, INC.  
FOR LEAVE TO INTERVENE**

Pursuant to Rule 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”), 18 C.F.R. § 385.214 (2014), Pivotal LNG, Inc. (“Pivotal”) hereby submits this Motion for Leave to Intervene in the above-referenced proceeding.

**I.  
COMMUNICATIONS**

Pivotal designates the following individuals to receive service of all filings made in this proceeding:

Kimberly Watson  
AGL Resources Inc.  
1200 Smith Street, Suite 900  
Houston, TX 77002  
[kwatson@aglresources.com](mailto:kwatson@aglresources.com)  
832-397-8523

Kathryn L. McCoy  
AGL Resources Inc.  
1200 Smith Street, Suite 900  
Houston, TX 77002  
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832-397-8642

**II.  
INTERVENOR**

Pivotal is a corporation organized under the laws of the State of Delaware and a wholly-owned subsidiary of AGL Resources Inc. (“AGLR”). Its principal place of business is located at Ten Peachtree Place, Atlanta, Georgia. Pivotal’s primary business includes the development, ownership, and operation of liquefied natural gas (“LNG”) facilities and the sale of LNG for vehicular or other end-use fuel. Pivotal owns an LNG liquefaction facility located near Trussville, Alabama.

AGLR also currently owns and operates, through subsidiaries Atlanta Gas Light Company (“AGLC”) and Chattanooga Gas Company (“CGC”), four LNG liquefaction,

vaporization, and storage facilities that are used by those companies to support their local distribution systems' peak service requirements.

**III.  
FILING**

On March 24, 2014, Strom, Inc. ("Strom") submitted its petition for declaratory order involving the Commission's jurisdiction over LNG in a Box ("LNG/B") or similar mobile LNG unit by General Electric Corporation. Strom would like the Commission to clarify that the LNG/B is not intended to be regulated as a LNG terminal since it is not a "facility" or "facilities" as defined by federal law pursuant to 42 USCS §5122.

**IV.  
INTERESTS**

As the owner of an LNG liquefaction facility, Pivotal has a direct interest in the outcome of this proceeding and such interest cannot be adequately represented or protected by any other party hereto. In these circumstances, Pivotal submits that good cause exists to grant it leave to intervene.

**V.  
CONCLUSION**

WHEREFORE, for the foregoing reasons, Pivotal respectfully requests that the Commission grant its intervention in this proceeding making it a party for all purposes.

Respectfully submitted,

*/s/ Kathryn L. McCoy*

Kathryn L. McCoy  
AGL Resources Inc.  
1200 Smith Street, Suite 900  
Houston, TX 77002

Counsel for Pivotal LNG, Inc.

Dated: April 15, 2014

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing “Motion for Leave to Intervene” upon each person designated on the official service list compiled by the Secretary in these proceedings, in accordance with Rule 2010 of the Federal Energy Regulatory Commission’s Rules of Practice and Procedure, 18 C.F.R. § 385.2010 (2014).

Dated at Houston, Texas this 15th day of April, 2014.

*/s/ Kathryn L. McCoy*

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Kathryn L. McCoy  
AGL Resources Inc.  
1200 Smith Street, Suite 900  
Houston, TX 77002