

Hinkel, Bill

From: Dave Publicover <dpublicover@outdoors.org>
Sent: Thursday, July 26, 2018 2:19 PM
To: Hinkel, Bill
Cc: Kaitlyn Bernard; Heather Clish; Susan Arnold
Subject: Appalachian Mountain Club Petition to Intervene - New England Clean Energy Connect
Attachments: Appalachian Mountain Club_LUPC Petition to Intervene_New England Clean Energy Connect.pdf

Mr. Hinkel:

Attached is the Appalachian Mountain Club's (AMC) petition to intervene in the matter of Central Maine Power Company's New England Clean Energy Connect Project Site Law Certification application. A hard copy of this application has been sent by mail.

Thank you for your consideration of this petition.

David Publicover
Senior Staff Scientist/Assistant Research Director

Appalachian Mountain Club

603-466-8140

[Website](#) | [Facebook](#) | [Twitter](#) | [YouTube](#)

Your Connection to the Outdoors



July 26, 2018
(electronic filing)

Maine Department of Agriculture, Conservation and Forestry
Land Use Planning Commission
Attn: Bill Hinkel
22 State House Station
Augusta, Maine 04333

Re: Request by the Appalachian Mountain Club to intervene in the matter of Central Maine Power Company's New England Clean Energy Connect Project Site Law Certification.

Mr. Hinkel:

Following is the Appalachian Mountain Club's (AMC) petition to intervene in the matter of Central Maine Power Company's New England Clean Energy Connect Project Site Law Certification application. A hard copy of this application has been sent by mail.

Thank you for your consideration of this petition.

Sincerely,

David Publicover
Appalachian Mountain Club
PO Box 298
Gorham, NH 03581
603-466-8140
dpublicover@outdoors.org

AMC Headquarters: 10 City Square • Boston, MA 02129-3740 • 617-523-0636 • outdoors.org

Training & Equipment Center: 6 Spice Street • Boston, MA 02129-3740

Regional Headquarters: Pinkham Notch Visitor Center • 361 Route 16 • Gorham, NH 03581-0298 • 603 466-2721

Additional Offices: Amherst, MA • Bethlehem, PA • Bretton Woods, NH • Greenville, ME • New York, NY • Portland, ME

STATE OF MAINE
DEPARTMENT OF AGRICULTURE, CONSERVATION & FORESTRY
LAND USE PLANNING COMMISSION
(Electronic Filing)

**APPALACHIAN MOUNTAIN CLUB PETITION TO INTERVENE IN THE MATTER
OF CENTRAL MAINE POWER COMPANY'S NEW ENGLAND CLEAN ENERGY
CONNECT PROJECT SITE LAW CERTIFICATION APPLICATION**

Pursuant to provisions of 5 M.R.S.A., Chapter 375 and Chapter 5 Section 5.13 of the Land Use Planning Commission rules, the Appalachian Mountain Club (AMC) hereby petitions to intervene in the above-captioned proceeding. Section 5.13(1) of Commission's rules states "*A petition to intervene shall be granted if it demonstrates that the petitioner is or may be substantially and directly affected by the proceeding.*" For reasons outlined below, the Appalachian Mountain Club is entitled to intervene in this matter.

The AMC, headquartered at 10 City Square, Boston, MA 02129, is a private non-profit organization whose mission "*promotes the protection, enjoyment, and understanding of the mountains, forests, waters, and trails of America's Northeast and Mid-Atlantic regions.*" We encourage public respect for the natural environment, provide leadership in its protection, and provide recreational and educational programs and facilities for the enjoyment and wise stewardship of the outdoors. Our over 100,000 members, volunteers and supporters reside largely in the Northeast and include over 6,500 members in our Maine chapter, as well as many others who visit the state on a regular basis to participate in outdoor recreational activities. AMC owns 74,000 acres of forest land in Piscataquis County that are managed for multiple uses including biological conservation, sustainable forestry, backcountry recreation and environmental education. We have been leaders in promoting ecotourism and regional economic development in the Moosehead Lake region. The AMC therefore has an active interest in the protection of Maine's significant natural resources. Any proposal to modify these environments must be undertaken only with the most careful consideration of the potential long-term impacts.

The AMC recognizes that the increased use of environmentally sound renewable energy resources is a positive development. We have a long history of research and advocacy in the areas of air quality and climate change, and fully recognize the adverse impacts that our society's continued heavy reliance on fossil fuels can have on the areas we care about. However, we feel that the construction of renewable energy facilities must be undertaken with a full understanding of the potential consequences, and that adverse impacts associated with these facilities should be avoided, minimized or mitigated to the maximum degree possible.

The AMC has a demonstrated history of active involvement with energy facility siting and operation issues in the state including wind and hydroelectric power. We have been active intervenors in several wind power permitting processes as well as Federal Energy Regulatory Commission (FERC) hydroelectric dam relicensings. We conduct GIS-based research on the relationship between wind power and natural resource values, and served as an alternate member of the Governor's Task Force on Wind Power Development in Maine. We thus have a strong

interest in the appropriate siting of future energy facilities (including transmission lines) in the state.

The AMC has the following specific interests that support our standing to intervene in this matter:

- **Kennebec Gorge:** AMC was an intervenor in the FERC relicensing of the Harris Dam hydroelectric project and led the development of a settlement agreement that included the protection of the shoreland of Indian Pond as well as public access and specified flow regimes to support recreational whitewater boating opportunities for different skill levels through the Gorge. AMC members are among those who use the Gorge for recreational activities, and AMC chapters host volunteer-led whitewater paddling trips through the Gorge.
- **Appalachian Trail:** The AMC is a member of the Appalachian Trail Conservancy, a non-profit organization that partners with the US National Park Service on the maintenance and management of the AT. AMC maintains sections of the trail in five states (though not the section that would be impacted by this project), and AMC members are users of all sections of the trail. AMC led the development of a settlement agreement with the Bingham wind power project that provided compensatory mitigation for the visual impact of the project on the AT, demonstrating our interest in protecting the scenic character of the trail.
- **New corridor:** The project as proposed would cut a new 150-foot-wide corridor for 53 miles through the undeveloped forests of western Maine, including the P-RR zone around Beattie Pond. The AMC has a long history of working for the conservation and appropriate development of Maine's undeveloped forest regions (dating back to our role in founding the Northern Forest Alliance in 1990), with a particular focus on the western Maine mountains region. We are a founding member of the Maine Mountain Collaborative¹, an organization dedicated to promoting innovative approaches the conservation and management of this globally significant region.

We therefore respectfully request that our Petition to Intervene in this matter be granted.

Dated July 26, 2018



David Publicover, D.F.
Senior Staff Scientist/Assistant Director of Research
Appalachian Mountain Club

¹ We wish to make clear that our intervention has no official connection to the Maine Mountain Collaborative, and any views expressed by AMC in this matter are the sole responsibility of AMC and should not be construed as representing those of the MMC or its members.

AFFIRMATION


Signature: David Publicover

July 26, 2018

Before me appeared David Publicover, who, being duly sworn, did testify that the foregoing statement was true and correct to the best of his knowledge and belief.

State of New Hampshire
Coos County


NOTARY PUBLIC

DENISE M. HORNE
Notary Public - New Hampshire
My Commission Expires April 19, 2022

Hinkel, Bill

From: Ed Barrett <EBarrett@lewistonmaine.gov>
Sent: Friday, July 27, 2018 11:46 AM
To: Hinkel, Bill
Subject: City of Lewiston Intervention - NECEC Project
Attachments: LUPC - Petition to Interven.pdf

Mr. Hinkel:

Attached please find the City of Lewiston's notice of intervention in support of the NECEC project. Please let me know if you need anything else or have any questions.

Ed Barrett
City Administrator
City of Lewiston
27 Pine Street
Lewiston, Me 04240
207-513-3011

**STATE OF MAINE
LAND USE PLANNING COMMISSION**

IN THE MATTER OF

Central Maine Power Co.)	
New England Clean Energy Connect)	Notice of Intervention of
#L-27625-26-A-N, #L-27625-TG-B-N,)	the City of Lewiston
#L-27625-2C-C-N, #L-27625-VP-D-N,)	in Support of NECEC
and #L-27625-IW-E-N)	
)	

Now comes the City of Lewiston (Lewiston) and notifies the Commission of its intervention as a party in the matter of the NECEC Project applications for Site Location of Development Act and Natural Resources Protection Act permits. *See* LUPC Regs. Ch. 5 §§ 5.13(1), 5.15. Pursuant to the applicable regulations governing intervention in Commission proceedings, governmental agencies may notify the Commission of their anticipated participation in any hearing in the form and manner required by Section 5.13(1). LUPC Regs. Ch. 5 § 5.15. Further, pursuant to Section 5.13(1), “[a] petition to intervene shall be granted if it demonstrates that the petitioner is or may be substantially and directly affected by the proceeding.” LUPC Regs. Ch. 5 § 5.13(1). As discussed below, Lewiston meets this criterion, and the Presiding Officer therefore should grant this petition for that reason and because Lewiston is a government entity.

I. Lewiston is substantially and directly affected by this proceeding.

Lewiston has a substantial and direct interest that will be affected by this proceeding. Following the electric infrastructure upgrades completed in Lewiston as part of the Maine Power Reliability Program (MPRP), Lewiston is now one of the strongest points in the New England electric grid. Accordingly, Lewiston was selected as the site of the new NECEC converter

station, and stands to benefit from the over \$200 million investment in the City planned as part of NECEC. Lewiston has recently experienced the transformative impact of the MPRP investment in the Larrabee Road substation, and looks forward to hosting the converter station and using the tax revenue to support our community. The NECEC investment will substantially expand the City's tax base with profound beneficial effects. Based on Fiscal Year 2016 data, Lewiston's Assessed Value per capita was \$60,690, by far the lowest among Maine's ten largest municipalities where the average was over \$114,000 per capita. In spite of the fact that Lewiston's per capita operating expenses were the lowest among this group of communities, at \$903 per capita versus an average of \$1,248, our low assessed value results in a high and burdensome municipal tax rate, particularly in light of our relatively low median incomes and high poverty rates. Once the Project is completed, Lewiston anticipates seeing approximately \$6 million in annual revenue from the Project, revenue that will help us meet our community's public service needs while also reducing the property tax burden to our residents.

No single entity or community stands to lose more if the NECEC is not permitted and built.

II. Lewiston has specific contentions regarding statutory and LUPC's regulatory criteria.

The City of Lewiston is seeking to intervene in these proceedings to raise specific contentions regarding the statutory and regulatory criteria that will apply to the project. The City's contentions include, but are not limited to, the following

- Consistent with the special exception criteria - no alternative site -- 12 M.R.S. § 685-A(10); LUPC Regs. § 10.23,I(3)(d)(8).
- Consistent with the special exception criteria - buffering -- 12 M.R.S. § 685-A(10); LUPC Regs. § 10.23,I(3)(d)(8).
- Consistent with the Comprehensive Land Use Plan -- LUPC Regs. § 10.23,I(3)(d)(8).
- Development standards (lighting) -- 38 M.R.S. § 489-A-1(1)(D); LUPC Regs. Ch. 10.25,F(2).

- Subdivision review (counting parcels) -- 38 M.R.S. § 489-A-1(1)(D); LUPC Regs. Ch. 10.24(F) and 10.25,Q(1).
- Dimensional requirements (and exceptions thereto) -- 38 M.R.S. § 489-A-1(1)(D); LUPC Regs. Ch. 10.26,A-G.
- Vegetation clearing -- 38 M.R.S. § 489-A-1(1)(D); LUPC Regs. Ch. 10.27,B.

Based on the foregoing, Lewiston notifies the Commission of its intent to participate as a party to raise specific contentions about the facts presented in CMP's application and compliance with the applicable statutory and regulatory criteria.

IV. Conclusion

Based on the foregoing, the City of Lewiston has satisfied the requirements for intervention under the applicable regulations and respectfully seeks to intervene in this proceeding as a party.

Date: July 27, 2018



Edward A. Barrett
City Administrator
City of Lewiston
27 Pine Street
Lewiston, Me 04240
207-513-3011
ebarrett@lewistonmaine.gov

Hinkel, Bill

From: Ntors Rosa <ntors07@hotmail.com>
Sent: Monday, July 30, 2018 8:01 PM
To: Hinkel, Bill
Subject: SLC-9

STATE OF MAINE

LAND USE PLANNING COMMISSION

In Re: New England Clean Energy Connect Project - SLC-9 PETITION TO INTERVENE OF Rosa E Cuenca, MD DR. Cuenca petitions the Maine Land Use Planning Commission to intervene as a party in Central Maine Power's (CMP's) application for a Site Location of Development Act permit and a Natural Resources Protection Act permit for the New England Clean Energy Connect (NECEC) high voltage direct current (HVDC) transmission line running from the Québec-Maine Border to Lewiston and related network upgrades. [Name] seeks leave to intervene pursuant to the Maine Administrative Procedures Act and the Rules and Regulations of the Land Use Planning Commission, Chapter 5, Section 5.13.

In support of this Petition, [Name] states the following:

In support of this Petition, [Name] states the following:

1. [State the effect that CMP's proposed line will have on your town/organization/person.] 2. [State any specific concerns or claims about the line (optional)] 3. [If you're an organization, state what your organization does and how your members will be impacted (for example, we are 301(c)(3) dedicated to birds and our members love birds and birds will be impacted by the transmission line, making our bird-loving members sad).] 4. If granted leave to intervene, [Name] intends to participate fully as a party in this proceeding.
5. [Name] will be "substantially and directly affected by the proceeding" because [one final sentence about how you/your organization/your town will be impacted by the project].

For the above reasons, [Name] requests that this Petition for Intervention be granted.

Date: July 30, 2018

Respectfully submitted,

Rosa E Cuenca, MD
246 Fish Hatchery Rd.
207-672-9321
ntors07@hotmail.com

Hinkel, Bill

From: Ed Buzzell <ebuzzel@hotmail.com>
Sent: Tuesday, July 31, 2018 1:21 PM
To: Hinkel, Bill
Subject: PETITION TO INTERVENE OF EDWIN BUZZELL

STATE OF MAINE
LAND USE PLANNING COMMISSION
In Re: New England Clean Energy Connect Project - SLC-9
PETITION TO INTERVENE 04333-0022

PETITION TO INTERVENE OF EDWIN BUZZELL

Edwin Buzzell petitions the Maine Land Use Planning Commission to intervene as a party in Central Maine Power's (CMP's) application for a Site Location of Development Act permit and a Natural Resources Protection Act permit for the New England Clean Energy Connect (NECEC) high voltage direct current (HVDC) transmission line running from the Québec-Maine Border to Lewiston and related network upgrades. Edwin Buzzell seeks leave to intervene pursuant to the Maine Administrative Procedures Act and the Rules and Regulations of the Land Use Planning Commission, Chapter 5, Section 5.13.

In support of this Petition, Edwin Buzzell states the following:

1. I am an experienced whitewater kayaker due to my age and health I am no longer able to kayak the upper gorge. I along with friends, inexperienced whitewater boaters, the disabled, young children, and other seniors boat only the Lower Gorge. I know of no other undeveloped, pristine river in Maine where I can go that has 9 miles of continuous non-technical whitewater all year long. The proposed crossing will destroy the aesthetics and unique character of that experience. CMP does not document the many people that utilize only the Lower Gorge. Some have traveled across the country to boat in the famous and pristine Kennebec Gorge.
2. The lower Kennebec Gorge has historic value to me and all other Americans. Two major expeditions John Montresor in 1761, and Hugh Finlay in 1774 utilized the Lower Gorge to complete their missions. The Montresor, Findlay Journals had a large impact on the revolutionary war. These Journals are well documented in the National Archives.
3. I frequently hunt, fish, hike and explore in this area. This project would undermine the wilderness experience that makes this area unique. It would harm the wildlife, fishery's and the aesthetic value of the land and waters.
4. This project aligns with the Old Canada Road National Scenic Byway for direct views of 100 foot transmission lines. Myself and my family travel the Byway on a regular basis. This project will damage the aesthetics of this byway. It is the mission of the directors of The National Scenic Byway (which I am a member) to preserve the Byway and the areas around it.
5. The CMP right of way is about 800 feet from my land and lodge in Moxie Gore. I am in the process of receiving paying guests at the lodge. The lodge is located at about 1300 feet elevation. It is the value of my lodge that it has nearly pristine views. Myself and my guests will have a full view of the project across the Western Mountains. These views are important to myself as well as my guests. This project will devalue my land, lodge, and its economic value. I would have to strongly reconsider more investment in the area if this project is approved.

If granted leave to intervene, Edwin Buzzell intends to participate fully as a party in this proceeding.

Edwin Buzzell and my family will be substantially and directly affected by the proceeding because, the proposed new corridor from the Canadian Border to The Forks is almost as wide as football field, 53 miles long, with 100 foot towers. The project as proposed, has the future capacity of an AC line for wind towers. The wind towers would also destroy the environment. This project is across some of Maine's best scenery and would be severely detrimental to the aesthetics of the area. I have been active outdoorsman in the area for over 40 years. I have owned a commercial whitewater business, kayak in the Kennebec Gorge, guided,

hunt, fish, and hike in all the areas affected by this project. I also live in Moxie Gore for most of the year. I am willing and capable to attend the hearings and give testimony from both a professional and a private viewpoint. For the above reasons, Edwin Buzzell requests that this Petition for Intervention be granted.

Date: July 31, 2018
Respectfully submitted,

Edwin Buzzell
305 Madawaska Ave.
Pittsfield, Maine 04967
207-487-5200 ebuzzel@hotmail.com



Virus-free. www.avg.com

STATE OF MAINE
LAND USE PLANNING COMMISSION
In Re: New England Clean Energy Connect Project - SLC-9
PETITION TO INTERVENE 04333-0022

RECEIVED
AUG 02 2018
LUPC - AUGUSTA

PETITION TO INTERVENE OF EDWIN BUZZELL

Edwin Buzzell petitions the Maine Land Use Planning Commission to intervene as a party in Central Maine Power's (CMP's) application for a Site Location of Development Act permit and a Natural Resources Protection Act permit for the New England Clean Energy Connect (NECEC) high voltage direct current (HVDC) transmission line running from the Québec-Maine Border to Lewiston and related network upgrades. Edwin Buzzell seeks leave to intervene pursuant to the Maine Administrative Procedures Act and the Rules and Regulations of the Land Use Planning Commission, Chapter 5, Section 5.13.

In support of this Petition, Edwin Buzzell states the following:

1. I am an experienced whitewater kayaker due to my age and health I am no longer able to kayak the upper gorge. I along with friends, inexperienced whitewater boaters, the disabled, young children, and other seniors boat only the Lower Gorge. I know of no other undeveloped, pristine river in Maine where I can go that has 9 miles of continuous non- technical whitewater all year long. The proposed crossing will destroy the aesthetics and unique character of that experience. CMP does not document the many people that utilize only the Lower Gorge. Some have traveled across the country to boat in the famous and pristine Kennebec Gorge.
2. The lower Kennebec Gorge has historic value to me and all other Americans. Two major expeditions John Montresor in 1761, and Hugh Finlay in 1774 utilized the Lower Gorge to complete their missions. The Montresor, Findlay Journals had a large impact on the revolutionary war. These Journals are well documented in the National Archives.
3. I frequently hunt, fish, hike and explore in this area. This project would undermine the wilderness experience that makes this area unique. It would harm the wildlife, fishery's and the aesthetic value of the land and waters.
4. This project aligns with the Old Canada Road National Scenic Byway for direct views of 100 foot transmission lines. Myself and my family travel the Byway on a regular basis. This project will damage the aesthetics of this byway. It is the mission of the directors of The National Scenic Byway (which I am a member) to preserve the Byway and the areas around it.
5. The CMP right of way is about 800 feet from my land and lodge in Moxie Gore. I am in the process of receiving paying guests at the lodge. The lodge is located at about 1300 feet elevation. It is the value of my lodge that it has nearly pristine views. Myself and my guests will have a full view of the project across the Western Mountains. These views are important to myself as well as my guests. This project will devalue my land, lodge, and its economic value. I would have to strongly reconsider more investment in the area if this project is approved.

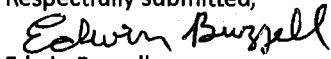
If granted leave to intervene, Edwin Buzzell intends to participate fully as a party in this proceeding.

Edwin Buzzell and my family will be substantially and directly affected by the proceeding because, the proposed new corridor from the Canadian Border to The Forks is almost as wide as football field, 53 miles long, with 100 foot towers. The project as proposed, has the future capacity of an AC line for wind towers. The wind towers would also destroy the environment. This project is across some of Maine's best scenery and would be severely detrimental to the aesthetics of the area. I have been active outdoorsman in the area for over 40 years. I have owned a commercial whitewater business, kayak in the Kennebec Gorge, guided, hunt, fish, and hike in all the areas affected by this project. I also live in Moxie Gore for most of the year. I am willing and capable to attend the hearings and give testimony from both a professional and a private viewpoint.

For the above reasons, Edwin Buzzell requests that this Petition for Intervention be granted.

Date: July 31, 2018

Respectfully submitted,



Edwin Buzzell

305 Madawaska Ave.

Pittsfield, Maine 04967

207-487-5200 ebuzzel@hotmail.com

Hinkel, Bill

From: Elizabeth Caruso <caratunkselectmen@myfairpoint.net>
Sent: Tuesday, July 31, 2018 6:55 PM
To: Hinkel, Bill
Subject: Town of Caratunk's petition to intervene in NECEC
Attachments: LUPC NECEC.pdf

Mr. Hinkel,

Please find attached the Town of Caratunk's petition to intervene in the NECEC project proceedings.

Please feel free to contact me as necessary. Thank you for your consideration in this matter. I look forward to receiving confirmation from your office.

Elizabeth Caruso
First Selectman
Town of Caratunk
207.672.3030

T o w n o f C a r a t u n k

Office of Selectmen

P O B o x 1 8 0 C a r a t u n k , M a i n e 0 4 9 2 5

2 0 7 . 6 7 2 . 3 0 3 0

c a r a t u n k s e l e c t m e n @ m y f a i r p o i n t . n e t

Maine Land Use Planning Commission
22 State House Station
Augusta, Maine 04333-0022

July 19, 2018

Re: Petition to intervene in CMP's Application for Site Location of Development Act permit and Natural Resources Protection Act permit for the New England Clean Energy Connect ("NECEC") from Québec-Maine Border to Lewiston and Related Network Upgrades

Re: New England Clean Energy Connect Project - SLC-9

Dear Sir or Madame,

Please find this written letter, emailed and postal mailed, as a **petition to intervene** as a party in Central Maine Power's (CMP's) application for a Site Location of Development Act permit and a Natural Resources Protection Act permit for the New England Clean Energy Connect (NECEC) high voltage direct current (HVDC) transmission line running from the Québec-Maine Border to Lewiston and related network upgrades. The Town of Caratunk is within the project boundaries and is, therefore, directly and indirectly affected. The Town of Caratunk seeks leave to intervene pursuant to the Maine Administrative Procedures Act and the Rules and Regulations of the Land Use Planning Commission, Chapter 5, Section 5.13.

On March 21, 2018, a CMP representative pitched a brief, overview presentation to the Caratunk Selectmen regarding this project. The representative was looking for a letter of support for their application. Later that week, Caratunk sent in a general letter of support. However, since that time, much information has been brought to light. The Selectmen share great concerns for the welfare of Caratunk residents as well as the State of Maine should this project be brought to fruition.

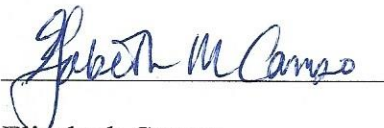
1. The Town of Caratunk has had no representation in this mitigation proceedings. The Town of Caratunk wants to participate and be represented in permitting decisions for this application because the Town is within project boundaries.
2. The Town of Caratunk has not been contacted or asked to be on the directing board of the LLC handling the mitigation funds. The LLC is represented by a few companies gaining direct benefit from this agreement.
3. Should this project go forth as stated, Maine energy would be locked up and prevented from engaging in any future renewable energy generation projects. Caratunk has already twice supported NextEra for a solar farm within its boundaries. One such solar project lost in direct competition to this NECEC. The valuation benefit from CMP's additional transmission lines does not even compare to a large solar project in Caratunk. Caratunk is against the NECEC project if it prevents future renewable energy opportunities that provide a huge tax benefit to all Caratunk landowners and significantly increase the Caratunk valuation. Therefore, Caratunk sees this project as reducing its tax revenue.

4. This project is forcing 1000' of transmission lines across a Scenic and Wild River, the Kennebec River, where Caratunk residents make their livelihoods in the whitewater rafting and fishing tourism industry. This is a direct detriment to Caratunk residents and businesses.
5. This project is not benefiting the Maine ratepayer with lower rates or cleaner energy. In fact, it may increase greenhouse gas emissions. The Town of Caratunk and its citizens have an interest in lower energy costs and clean energy sources.
6. This project is not financially beneficial to the Maine economy or its residents.
7. Independent PUC consultants have found that CMP's project application boasts inflated economic and financial benefits.
8. Green and environmental agencies as well as the Maine Legislature's Committee of Environmental and Natural Resources and the Maine Legislature's Committee on Energy, Utilities and Technology have stated concerns on this project.

We see this project as benefiting Hydro-Quebec and the Commonwealth of Massachusetts at the expense of Caratunk residents and the State of Maine. This should not be so. If granted intervenor status, we affirm that we are able to participate in the proceedings in good faith with Elizabeth Caruso as the spokesperson for the Town of Caratunk.

Thank you for the opportunity to intervene and to provide comments to the LUPC hearings, etc.

Sincerely,



Elizabeth Caruso
First Selectman



Neil Katz
Second Selectman



Garrett Booth
Third Selectman

Hinkel, Bill

From: Kathy Barkley <kbraft@gmail.com>
Sent: Wednesday, August 01, 2018 10:27 AM
To: Hinkel, Bill
Subject: LUPC petition
Attachments: Barkley LUPC petition.docx

Dear Mr. Hinkel,

I am writing to intervene in Avangrid/CMP project petition. Please read my attached letter.

sincerely,
Kathy Barkley

August 1, 2018

I, Kathy Barkley submits this petition to the Maine Land Use Planning Commission to intervene as a party in Central Maine Power's (CMP's) application for a Site Location of Development Act permit and a Natural Resources Protection Act permit for the New England Clean Energy Connect (NECEC) high voltage direct current (HVDC) transmission line running from the Québec-Maine Border to Lewiston and related network upgrades. Kathy Barkley seeks leave to intervene pursuant to the Maine Administrative Procedures Act and the Rules and Regulations of the Land Use Planning Commission, Chapter 5, Section 5.13.

Avangrid/CMP's projected 145-mile power line through Maine wildlands should not be approved. The short term economic benefits surrounding its construction in no way mitigate the negative effects on Maine's flora, fauna and scenic vistas. As whitewater based tourism declines (as proven by years of declining commercial rafting numbers) our Maine wildlands and wildlife will be ever more important in bringing visitors to the Kennebec Valley. This line is not in the best interest of Maine. Massachusetts can find other ways of meeting its power needs than buying Canadian power and forever destroying Maine wildlands. The idea that this line is easier and provides potential for massive profit to Avangrid/CMP (as shown by multimillion dollar offers to the state of Massachusetts and Kennebec Valley towns) does not demonstrate long term benefit to the state of Maine.

The backdoor manner in which CMP colluded with its carefully chosen board to reach mitigation agreements raises red flags about this proposal. From its dam relicensing CMP is very familiar with who the user groups are in the affected area and deliberately chose to exclude the majority of them from this process. The majority of board members stand to personally benefit from their relationship with CMP.

At CMP's informational meeting in the West Forks this project was presented as a done deal. The only question seemed to be having the line go over or under the Kennebec River. CMP's ownership of the affected land was cited but ownership does not mean doing whatever you want with land as evidenced by Maine's land use regulations and local zoning. Only through the efforts of concerned Kennebec Valley residents did the public learn they could have input into this process.

If this line is constructed scenic vistas hard earned by hiking and Maine's beautiful wildlands will be forever industrialized. This project will permanently destroy Maine wildlands while providing no benefit to the majority of Maine residents. This project should not be approved.

Sincerely,

Kathy Barkley

Kathy Barkley

220 Main St
PO Box 55
Caratunk, ME 04925

Hinkel, Bill

From: Angela Morin <Amorin@mainechamber.org>
Sent: Wednesday, August 01, 2018 3:22 PM
To: Hinkel, Bill
Subject: Draft LUPC Petition
Attachments: DOC013.pdf

Good afternoon,

Attached you'll find a signed draft petition for LUPC from Dana F. Connors, President of the Maine State Chamber of Commerce.

Sincerely,

Angela Morin
Executive Assistant to the President
Maine State Chamber of Commerce
125 Community Drive, Suite 101
Augusta, Maine 04330
Amorin@mainechamber.org
Phone: 207-623-4568 ext. 101
Fax: 207-622-7723

**STATE OF MAINE
LAND USE PLANNING COMMISSION**

IN THE MATTER OF

Central Maine Power Co.)	
New England Clean Energy Connect)	Petition to Intervene of
#L-27625-26-A-N, #L-27625-TG-B-N,)	Maine State Chamber Commerce
#L-27625-2C-C-N, #L-27625-VP-D-N,)	in Support of NECEC
and #L-27625-IW-E-N)	

Now comes the Maine State Chamber of Commerce (Maine State Chamber) and petitions to intervene as a party in the matter of the NECEC Project applications for Site Location of Development Act and Natural Resources Protection Act permits. *See* LUPC Regs. Ch. 5 § 5.13(1). Pursuant to the applicable regulations governing the conduct of public hearings, “[a] petition to intervene shall be granted if it demonstrates that the petitioner is or may be substantially and directly affected by the proceeding.” LUPC Regs. Ch. 5 § 5.13(1). As discussed below, the Maine State Chamber meets this criterion, and the Presiding Officer therefore should grant this petition.

I. The Maine State Chamber is substantially and directly affected by this proceeding.

The Maine State Chamber has a substantial and direct interest that will be affected by this proceeding. As the State’s leading business advocate, the Maine State Chamber works to ensure a business climate in which its members can compete successfully in the local, regional, national, and world marketplaces. We are a not-for-profit organization supported through membership dues and contributions. Our purpose is to advocate on behalf of business interests, with a focus on economic development and environmental issues, among others, in an effort to advance a proactive agenda for economic growth and prosperity in Maine. The NECEC Project will impact

our mission, as it will provide significant employment and economic development benefits to Maine, is estimated to increase Maine's Gross Domestic Product by nearly \$64 million, and is expected to provide wholesale electricity cost reductions to Maine businesses. These positive impacts will benefit the members of the Maine State Chamber, as they enhance the business climate in the State and increase the competitiveness of Maine businesses.

II. The Maine State Chamber has specific contentions regarding statutory and LUPC's regulatory criteria.

The Maine State Chamber is seeking to intervene in these proceedings to raise specific contentions regarding the statutory and regulatory criteria that will apply to the project. Our contentions include, but are not limited to, the following:

- No alternative site -- 12 M.R.S. § 685-A(10); LUPC Regs. § 10.23,I(3)(d)(8).
- Adequate buffering -- 12 M.R.S. § 685-A(10); LUPC Regs. § 10.23,I(3)(d)(8).
- Satisfaction of LUPC development standards -- LUPC Regs. Ch. 10.25.
- Satisfaction of LUPC dimensional requirements -- LUPC Regs. Ch. 10.26.

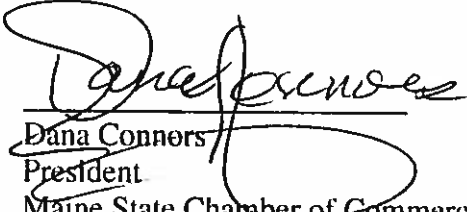
Depending on the format established for this hearing, our witnesses will file written reports and/or present testimony with an opportunity for questions and cross-examination. These witnesses will ensure that the Maine State Chamber presents detailed, technical information about the proposed project. We will attend pre-hearing conferences and the public hearing. Therefore, the Maine State Chamber is both prepared and capable of participating in this proceeding and supporting the contentions discussed above. Based on the foregoing, the Maine State Chamber seeks to intervene to raise specific contentions about the facts presented in CMP's application and compliance with the applicable statutory and regulatory criteria.

IV. Conclusion

Communities and businesses along the Maine corridor between Quebec and Massachusetts are enthusiastic about the economic benefits and job opportunities NECEC will

bring to Maine. Given the financial stability and expertise of CMP, the Maine State Chamber stands by our support of this Project. Based on the foregoing, the Maine State Chamber has satisfied the requirements for intervention under the applicable regulations and respectfully seeks to intervene in this proceeding as a party.

Date:



Dana Connors
President
Maine State Chamber of Commerce
125 Community Drive
Augusta, ME 04330

Hinkel, Bill

From: Tony DiBlasi <diblasi.tony@gmail.com>
Sent: Wednesday, August 01, 2018 6:54 PM
To: Hinkel, Bill
Subject: CMP Corridor - Petition to Intervene
Attachments: Tony DiBlasi - petition to intervene - CMP Corridor.docx

State of Maine
Land Use Planning Commission
22 State House Station
Augusta, Maine 04333-0022

Re: Petition to Intervene in New England Clean Energy Connect Project - SLC-9;

Dear Land Use Planning Commission,

Please find this written letter, emailed and postal mailed, as a petition to intervene in Central Maine Power's (CMP's) application for a Site Location of Development Act permit and a Natural Resources Protection Act permit for the New England Clean Energy Connect (NECEC) high voltage direct current (HVDC) transmission line running from the Québec-Maine Border to Lewiston and related network upgrades.

My name is Anthony DiBlasi. I Live in Windham Maine and own a home in Caratunk. I have worked as a commercial whitewater rafting guide and been private boater in The Forks region for almost 25 years. Caratunk is one of the many towns across the State of Maine affected by the proposed corridor. I spend most of my free time Kayaking, hiking, and rafting in the Caratunk/Forks area. As a long-time guide, I love to share this beautiful area with visitors from all over the United States and sometimes from other countries as well. My concerns for this project are not only for the area that I love dearly, but for the entire State of Maine of which I am a life-long resident.

1. The Caratunk/Forks area's economy relies almost exclusively on recreational tourism. This project will put 1000' of power line (with large aircraft guards) across the Kennebec River which I take my guests on whitewater rafting expeditions. These same guests comment on the serene wilderness aspect of the river, and the fact that they've been able to be somewhere for hours and hours without seeing anything man made. These people truly appreciate being able to experience such a unique location. These same people are the economic life-blood for this region. Many others come to just simply enjoy the river and the surrounding area hikes. In addition, this power line will be visible from the summits of most of the local mountains, the Old Canada Road Scenic Byway, and much of ITS 89 (a major snowmobile trail utilized by many of the businesses here). This interruption to the scenic view is a direct negative impact on recreational tourism, and in turn, to these businesses that support this community.

2. This project does not benefit the Maine taxpayer with lower rates or cleaner energy. NECEC may increase greenhouse gas emissions. I personally have an interest in lower energy costs and clean energy sources for my community and for the people of Maine.

3. This project is not financially beneficial to Maine's economy or its residents. The PUC found that the CMP project application boasts inflated economic and financial benefits. They reported that the project will suppress existing and future renewable energy generation in Maine due in part to increased congestion on the transmission line. In their letter, these legislators also expressed the negative impacts on wildlife, forests, and clean water.

4. NECEC, as proposed, would negatively affect wildlife. The proposed corridor would require significant clearing through sensitive habitat, including habitat for many rare species, as well as ecologically and economically important species like Brook Trout and White-tailed Deer. The proposal would affect more than 1,000 acres of wetland, cross 115 streams and scores of vernal pools, and degrade approximately 20 acres of inland waterfowl and wading bird habitat.

5. If this corridor becomes a reality, it is only the beginning of applications to the State of Maine for more industrial power and other corridors in this area and beyond. The reality is, Maine is a tourism state, and people come here to experience our greatest resources – our clean water, our vast forests, our abundant wildlife, our thriving fisheries, and our vast mountain views where you can see nothing but trees, water, and other mountains for miles and miles.

6. My income depends on the health and pureness of the Kennebec River Gorge. For myself and for the recreational industry I am allied with, there is no compromise. Without these you have devalued your business and have opened the door to future developments.”

If granted leave to intervene, I intend to participate as a party in this proceeding.

The economic benefit of this project is overstated, while the environmental impact is underestimated. While this project will be very lucrative for CMP and hydro producers in Canada, this is a bad deal for Maine’s residents, wilderness, and wildlife.

For the above reasons, I request that this Petition for Intervention be granted.

Date: August 1, 2018

Respectfully submitted,
Anthony DiBlasi
3 Van Tassel Dr
Windham, ME 04062
207-415-1487
diblasi.tony@gmail.com

P.S. Please find an attached MS Word Doc of this letter.

State of Maine
Land Use Planning Commission
22 State House Station
Augusta, Maine 04333-0022

Re: Petition to Intervene in New England Clean Energy Connect Project - SLC-9;

Dear Land Use Planning Commission,

Please find this written letter, emailed and postal mailed, as a petition to intervene in Central Maine Power's (CMP's) application for a Site Location of Development Act permit and a Natural Resources Protection Act permit for the New England Clean Energy Connect (NECEC) high voltage direct current (HVDC) transmission line running from the Québec-Maine Border to Lewiston and related network upgrades.

My name is Anthony DiBlasi. I Live in Windham Maine and own a home in Caratunk. I have been a whitewater guide in The Forks region for almost 25 years. Caratunk is one of the many towns across the State of Maine affected by the proposed corridor. I spend most of my free time Kayaking, hiking, and rafting in the Caratunk/Forks area. As a long-time guide, I love to share this beautiful area with visitors from all over the United States and sometimes from other countries as well. My concerns for this project are not only for the area that I live but for the entire State of Maine of which I am a resident.

1. The Caratunk/Forks area's economy relies almost exclusively on recreational tourism. This project will put 1000' of power line (with large aircraft guards) across the Kennebec River which I take my guests on whitewater rafting expeditions. These same guests comment on the serene wilderness aspect of the river, and the fact that they've been able to be somewhere for hours and hours without seeing anything man made. These people truly appreciate being able to experience such a unique location. These same people are the economic life-blood for this region. Many others come to just simply enjoy the river and the surrounding area hikes. In addition, this power line will be visible from the summits of most of the local mountains, the Old Canada Road Scenic Byway, and much of ITS 89 (a major snowmobile trail utilized by many of the businesses here). This interruption to the scenic view is a direct negative impact on recreational tourism, and in turn, to these businesses that support this community.

2. This project does not benefit the Maine taxpayer with lower rates or cleaner energy. NECEC may increase greenhouse gas emissions. I personally have an interest in lower energy costs and clean energy sources for my community and for the people of Maine.

3. This project is not financially beneficial to Maine's economy or its residents. The PUC found that the CMP project application boasts inflated economic and financial benefits. They reported that the project will suppress existing and future renewable energy generation in Maine due in part to increased congestion on the transmission line. In their letter, these legislators also expressed the negative impacts on wildlife, forests, and clean water.

4. NECEC, as proposed, would negatively affect wildlife. The proposed corridor would require significant clearing through sensitive habitat, including habitat for many rare species, as well as ecologically and economically important species like Brook Trout and White-tailed Deer. The proposal would affect more than 1,000 acres of wetland, cross 115 streams and scores of vernal pools, and degrade approximately 20 acres of inland waterfowl and wading bird habitat.

5. If this corridor becomes a reality, it is only the beginning of applications to the State of Maine for more industrial power and other corridors in this area and beyond. The reality is, Maine is a tourism state, and people come here to experience our greatest resources – our clean water, our vast forests, our abundant wildlife, our thriving fisheries, and our vast mountain views where you can see nothing but trees, water, and other mountains for miles and miles.

6. My income depends on the health and pureness of the Kennebec River Gorge. For myself and for the recreational industry I am allied with, there is no compromise. Without these you have devalued your business and have opened the door to future developments.”

If granted leave to intervene, I intend to participate as a party in this proceeding.

The economic benefit of this project is overstated, while the environmental impact is underestimated. While this project will be very lucrative for CMP and hydro producers in Canada, this is a bad deal for Maine’s residents, wilderness, and wildlife.

For the above reasons, I request that this Petition for Intervention be granted.

Date: August 1, 2018

Respectfully submitted,
Anthony DiBlasi
3 Van Tassel Dr
Windham, ME 04062
207-415-1487
diblasi.tony@gmail.com

Hinkel, Bill

From: Mandy Farrar <manfarr1974@yahoo.com>
Sent: Wednesday, August 01, 2018 5:25 AM
To: Hinkel, Bill
Subject: Petition to Intervene in New England Clean Energy Connect Project - SLC-9
Attachments: Intervene LUPC.pdf

State of Maine

Land Use Planning Commission

22 State House Station

Augusta, Maine 04333-0022

Re: Petition to Intervene in New England Clean Energy Connect Project - SLC-9;

Dear Mr. Beyer,

Please find this written letter via email (and attached PDF) as a petition to intervene in Central Maine Power's (CMP's) application for a Site Location of Development Act permit and a Natural Resources Protection Act permit for the New England Clean Energy Connect (NECEC) high voltage direct current (HVDC) transmission line running from the Québec-Maine Border to Lewiston and related network upgrades.

I live in the town of Caratunk, one of the many towns across the State of Maine affected by the proposed corridor. I spend most of my free time hiking, rafting, canoeing, and fishing in Caratunk/Forks area, and I love to share this beautiful area with visitors from all over the United States and beyond. My concerns for this project are not only for the area that I live but also for the State of Maine.

1. The Caratunk/Forks area's economy relies almost exclusively on recreational tourism. This project will put 1000' of powerline (with large aircraft guards) across the Kennebec River, where local fly fishing guides take their guests on wilderness fishing trips, commercial and non-commercial people come to raft (and spend money in town), and many others come to just simply enjoy the river. In addition, this power line will be visible from the summits of most of the local mountains, the Old Canada Road Scenic Byway, and much of ITS 89 (a major snowmobile trail utilized by many of the businesses here). This interruption to the scenic view is a direct negative impact on recreational tourism, and in turn, to these businesses that support this community.
2. This project does not benefit the Maine taxpayer with lower rates or cleaner energy. NECEC may increase greenhouse gas emissions. I personally have an interest in lower energy costs and clean energy sources for my community and for the people of Maine.
3. CMP's transmission line would do little to reduce the pollution that causes climate change. CMP's line would transmit power from HydroQuebec, who has not demonstrated that the power transmitted by this project will result in a true and verifiable reduction in greenhouse gas emissions, rather than simply shifting existing power from one market to another.
4. This project is not financially beneficial to Maine's economy or it's residents. The PUC found that the CMP project application boasts inflated economic and financial benefits. They reported that the project will suppress existing and future renewable energy generation in Maine due in part to increased congestion on the transmission line. In their letter, these legislators also expressed the negative impacts on wildlife, forests, and clean water.
5. NECEC, as proposed, would negatively affect wildlife. The proposed corridor would require significant clearing through sensitive habitat, including habitat for many rare species, as well as ecologically and economically important

species like Brook Trout and White-tailed Deer. The proposal would affect more than 1,000 acres of wetland, cross 115 streams and scores of vernal pools, and degrade approximately 20 acres of inland waterfowl and wading bird habitat.

6. If this corridor becomes a reality, it is only the beginning of applications to the State of Maine for more industrial power and other corridors in this area and beyond. The reality is, Maine is a tourism state, and people come here to experience our greatest resources – our clean water, our vast forests, our abundant wildlife, our thriving fisheries, and our vast mountain views where you can see nothing but trees, water, and other mountains for miles and miles.

If granted leave to intervene, I intend to participate as a party in this proceeding.

The economic benefit of this project is overstated, while the environmental impact is underestimated. While this project will be very lucrative for CMP and hydro producers in Canada, this is a bad deal for Maine's residents, wilderness, and wildlife.

For the above reasons, I request that this Petition for Intervention be granted.

Respectfully submitted,

Mandy Farrar

190 Main Street

Caratunk, ME 04925

207-672-6411

manfarr1974@yahoo.com

August 1, 2018

State of Maine
Land Use Planning Commission
22 State House Station
Augusta, Maine 04333-0022

Re: Petition to Intervene in New England Clean Energy Connect Project - SLC-9;

Dear Mr. Beyer,

Please find this written letter via email as a petition to intervene in Central Maine Power's (CMP's) application for a Site Location of Development Act permit and a Natural Resources Protection Act permit for the New England Clean Energy Connect (NECEC) high voltage direct current (HVDC) transmission line running from the Québec-Maine Border to Lewiston and related network upgrades.

I live in the town of Caratunk, one of the many towns across the State of Maine affected by the proposed corridor. I spend most of my free time hiking, rafting, canoeing, and fishing in Caratunk/Forks area, and I love to share this beautiful area with visitors from all over the United States and beyond. My concerns for this project are not only for the area that I live but also for the State of Maine.

1. The Caratunk/Forks area's economy relies almost exclusively on recreational tourism. This project will put 1000' of powerline (with large aircraft guards) across the Kennebec River, where local fly fishing guides take their guests on wilderness fishing trips, commercial and non-commercial people come to raft (and spend money in town), and many others come to just simply enjoy the river. In addition, this power line will be visible from the summits of most of the local mountains, the Old Canada Road Scenic Byway, and much of ITS 89 (a major snowmobile trail utilized by many of the businesses here). This interruption to the scenic view is a direct negative impact on recreational tourism, and in turn, to these businesses that support this community.
2. This project does not benefit the Maine taxpayer with lower rates or cleaner energy. NECEC may increase greenhouse gas emissions. I personally have an interest in lower energy costs and clean energy sources for my community and for the people of Maine.
3. CMP's transmission line would do little to reduce the pollution that causes climate change. CMP's line would transmit power from HydroQuebec, who has not demonstrated that the power transmitted by this project will result in a true and verifiable reduction in greenhouse gas emissions, rather than simply shifting existing power from one market to another.
4. This project is not financially beneficial to Maine's economy or it's residents. The PUC found that the CMP project application boasts inflated economic and financial benefits. They reported that the project will suppress existing and future renewable energy generation in Maine due in part to increased congestion on the transmission line. In their letter, these legislators also expressed the negative impacts on wildlife, forests, and clean water.
5. NECEC, as proposed, would negatively affect wildlife. The proposed corridor would require significant clearing through sensitive habitat, including habitat for many rare species, as well as ecologically and economically important species like Brook Trout and White-tailed Deer. The proposal would affect more than 1,000 acres of wetland, cross 115 streams and scores of vernal pools, and degrade approximately 20 acres of inland waterfowl and wading bird habitat.

6. If this corridor becomes a reality, it is only the beginning of applications to the State of Maine for more industrial power and other corridors in this area and beyond. The reality is, Maine is a tourism state, and people come here to experience our greatest resources – our clean water, our vast forests, our abundant wildlife, our thriving fisheries, and our vast mountain views where you can see nothing but trees, water, and other mountains for miles and miles.

If granted leave to intervene, I intend to participate as a party in this proceeding.

The economic benefit of this project is overstated, while the environmental impact is underestimated. While this project will be very lucrative for CMP and hydro producers in Canada, this is a bad deal for Maine's residents, wilderness, and wildlife.

For the above reasons, I request that this Petition for Intervention be granted.

Respectfully submitted,
Mandy Farrar
190 Main Street
Caratunk, ME 04925
207-672-6411
manfarr1974@yahoo.com

Hinkel, Bill

From: Courtney Fraley <courtneyfraley@gmail.com>
Sent: Wednesday, August 01, 2018 4:50 PM
To: Hinkel, Bill
Subject: Petition to Intervene in New England Clean Energy Connect Project - SLC-9
Attachments: State of Maine.docx

State of Maine
Land Use Planning Commission
22 State House Station
Augusta, Maine 04333-0022

Re: Petition to Intervene in New England Clean Energy Connect Project - SLC-9

Dear Land Use Planning Commission,

Please find this written letter, emailed, as a petition to intervene in Central Maine Power's (CMP's) application for a Site Location of Development Act permit and a Natural Resources Protection Act permit for the New England Clean Energy Connect (NECEC) high voltage direct current (HVDC) transmission line running from the Québec-Maine Border to Lewiston and related network upgrades.

My name is Courtney Fraley. I have visited Caratunk multiple times over the past 5 years and had planned continued visits due to the beauty and unspoiled nature there. This is one of the many towns across the State of Maine affected by the proposed corridor. I have spent time hiking, rafting, and fishing in Caratunk/Forks area.

1. The Caratunk/Forks area's economy relies almost exclusively on recreational tourism. This project will put 1000' of power line (with large aircraft guards) across the Kennebec River. On my visits, my favorite thing is the serenity of the river, and the fact that you can be somewhere for hours and hours without seeing anything man made. I have floated, rafted privately and with rafting companies, spent money in town and at local establishments and just simply enjoyed the river and the surrounding area hikes. In addition, this power line will be visible from the summits of most of the local mountains which I have hiked, the Old Canada Road Scenic Byway, and much of ITS 89 (a major snowmobile trail utilized by many of the businesses here). This interruption to the scenic view is a direct negative impact on recreational tourism, and in turn, to the businesses that support the community.
2. This project does not benefit the Maine taxpayer with lower rates or cleaner energy. NECEC may increase greenhouse gas emissions.
3. This project is not financially beneficial to Maine's economy or its residents. The PUC found that the CMP project application boasts inflated economic and financial benefits. They reported that the project will suppress existing and future renewable energy generation in Maine due in part to increased congestion on the transmission line. In their letter, these legislators also expressed the negative impacts on wildlife, forests, and clean water.
4. NECEC, as proposed, would negatively affect wildlife. The proposed corridor would require significant clearing through sensitive habitat, including habitat for many rare species, as well as ecologically and economically important species like Brook Trout and White-tailed Deer. The proposal would affect more than 1,000 acres of wetland, cross 115 streams and scores of vernal pools, and degrade approximately 20 acres of inland waterfowl and wading bird habitat. I sat in on two of the CMP informational meetings. Asked during the Franklin County meeting if they would avoid destroying the habitat of deer during breeding/birthing times and partridge during nesting/hatching time, they answered that they would not halt construction unless it was specified that they had to. This means they have no interest in working with the needs of the environment and protecting it. They will do only what is mandated.
5. If this corridor becomes a reality, it is only the beginning of applications to the State of Maine for more industrial power and other corridors in this area and beyond. The reality is, Maine is a tourism state, and people come there to experience its greatest resources – clean water, vast forests, abundant wildlife, thriving fisheries, and vast mountain views where you can see nothing but trees, water, and other mountains for miles and miles.
6. I also feel that the people of the most affected area, The Forks area, were kept in the dark about negotiations being made by a committee handpicked by a person that CMP was working with on this starting two years ago. This

committee represented the Forks area residents, without those residents and even other local select persons being made aware of this by anyone on the committee. Members of the community feel misrepresented/unrepresented. CMP has largely downplayed this project to the public. While they've given out facts, they have not made the general person, who may not understand the lingo of the CMP world, know that just because much of the corridor is existing, it will be drastically changed from top to bottom, not just the new section. People are slowly realizing it, and now being told 'it's too late to do anything about it'.

The economic benefit of the project is overstated, while the environmental impact is underestimated. While this project will be very lucrative for CMP and hydro producers in Canada, this is a bad deal for Maine's residents, wilderness, and wildlife.

For the above reasons, I request that this Petition for Intervention be granted.

Date: August 1, 2018

Respectfully submitted,
Courtney Fraley
3545 Grandview Club Rd
Pfafftown, North Carolina 27040

State of Maine
Land Use Planning Commission
22 State House Station
Augusta, Maine 04333-0022

Re: Petition to Intervene in New England Clean Energy Connect Project - SLC-9

Dear Land Use Planning Commission,

Please find this written letter, emailed , as a petition to intervene in Central Maine Power's (CMP's) application for a Site Location of Development Act permit and a Natural Resources Protection Act permit for the New England Clean Energy Connect (NECEC) high voltage direct current (HVDC) transmission line running from the Québec-Maine Border to Lewiston and related network upgrades.

My name is Courtney Fraley. I have visited Caratunk multiple times over the past 5 years and had planned continued visits due to the beauty and unspoiled nature there. This is one of the many towns across the State of Maine affected by the proposed corridor. I have spent time hiking, rafting, and fishing in Caratunk/Forks area.

1. The Caratunk/Forks area's economy relies almost exclusively on recreational tourism. This project will put 1000' of power line (with large aircraft guards) across the Kennecott River. On my visits, my favorite thing is the serenity of the river, and the fact that you can be somewhere for hours and hours without seeing anything man made. I have floated, rafted privately and with rafting companies, spent money in town and at local establishments and just simply enjoyed the river and the surrounding area hikes. In addition, this power line will be visible from the summits of most of the local mountains which I have hiked, the Old Canada Road Scenic Byway, and much of ITS 89 (a major snowmobile trail utilized by many of the businesses here). This interruption to the scenic view is a direct negative impact on recreational tourism, and in turn, to the businesses that support the community.

2. This project does not benefit the Maine taxpayer with lower rates or cleaner energy. NECEC may increase greenhouse gas emissions.

3. This project is not financially beneficial to Maine's economy or its residents. The PUC found that the CMP project application boasts inflated economic and financial benefits. They reported that the project will suppress existing and future renewable energy generation in Maine due in part to increased congestion on the transmission line. In their letter, these legislators also expressed the negative impacts on wildlife, forests, and clean water.

4. NECEC, as proposed, would negatively affect wildlife. The proposed corridor would require significant clearing through sensitive habitat, including habitat for many rare species, as well as ecologically and economically important species like Brook Trout and White-tailed Deer. The proposal would affect more than 1,000 acres of wetland, cross 115 streams and scores of vernal pools, and degrade approximately 20 acres of inland waterfowl and wading bird habitat. I sat in on two of the CMP informational meetings. Asked during the Franklin County meeting if they would avoid destroying the habitat of deer during breeding/birthing times and partridge during nesting/hatching time, they answered that they would not halt construction unless it was specified that they had to. This means they have no interest in working with the needs of the environment and protecting it. They will do only what is mandated.

5. If this corridor becomes a reality, it is only the beginning of applications to the State of Maine for more industrial power and other corridors in this area and beyond. The reality is, Maine is a tourism state, and people come there to experience its greatest resources – clean water, vast forests, abundant wildlife, thriving fisheries, and vast mountain views where you can see nothing but trees, water, and other mountains for miles and miles.

6. I also feel that the people of the most affected area, The Forks area, were kept in the dark about negotiations being made by a committee hand-picked by a person that CMP was working with on this starting two years ago. This committee represented the Forks area residents, without those residents and even other local select persons being made aware of this by anyone on the committee. Members of the community feel misrepresented/unrepresented. CMP has largely downplayed this project to the public. While they've given out facts, they have not made the general person, who may not understand the lingo of the CMP world, know that just because much of the corridor is existing, it will be drastically changed from top to bottom, not just the new section. People are slowly realizing it, and now being told 'it's too late to do anything about it'.

The economic benefit of the project is overstated, while the environmental impact is underestimated. While this project will be very lucrative for CMP and hydro producers in Canada, this is a bad deal for Maine's residents, wilderness, and wildlife.

For the above reasons, I request that this Petition for Intervention be granted.

Date: August 1, 2018

Respectfully submitted,

Courtney Fraley
3545 Grandview Club Rd
Pfaftown, North Carolina 27040

Hinkel, Bill

From: Braddah hale <1withwhitewaters@gmail.com>
Sent: Wednesday, August 01, 2018 6:38 PM
To: Hinkel, Bill
Subject: Re: Petition to intervene CMP corridor

On Wed, Aug 1, 2018, 17:59 Braddah hale <1withwhitewaters@gmail.com> wrote:

My name is Noah Hale. I've lived in the town of the Forks for 35 years. This is one of the many towns across the State of Maine affected by the proposed corridor. I spend most of my free time kayaking in Caratunk/Forks area. As a long time guide, I love to share this beautiful area with visitors from all over the United States and often from other countries. My concerns for this project are not only for the area that I live but for the entire State of Maine.

1. The Caratunk/Forks area's economy relies almost exclusively on recreational tourism. This project will put 1000' of power line (with large aircraft guards) across the Kennebec River, where my husband, a fly fishing guide, along with his partners, take their guests on wilderness fishing trips. Their guests often comment on the serenity of the river, and the fact that they've been able to be somewhere for hours and hours without seeing anything man made. People come to raft either privately or with the many rafting companies (and spend money in town), and many others come to just simply enjoy the river and the surrounding area hikes. In addition, this power line will be visible from the summits of most of the local mountains, the Old Canada Road Scenic Byway, and much of ITS 89 (a major snowmobile trail utilized by many of the businesses here). This interruption to the scenic view is a direct negative impact on recreational tourism, and in turn, to these businesses that support this community.
2. This project does not benefit the Maine taxpayer with lower rates or cleaner energy. NECEC may increase greenhouse gas emissions. I personally have an interest in lower energy costs and clean energy sources for my community and for the people of Maine.
3. This project is not financially beneficial to Maine's economy or its residents. The PUC found that the CMP project application boasts inflated economic and financial benefits. They reported that the project will suppress existing and future renewable energy generation in Maine due in part to increased congestion on the transmission line. In their letter, these legislators also expressed the negative impacts on wildlife, forests, and clean water.
4. NECEC, as proposed, would negatively affect wildlife. The proposed corridor would require significant clearing through sensitive habitat, including habitat for many rare species, as well as ecologically and economically important species like Brook Trout and White-tailed Deer. The proposal would affect more than 1,000 acres of wetland, cross 115 streams and scores of vernal pools, and degrade approximately 20 acres of inland waterfowl and wading bird habitat. I sat in on two of the CMP informational meetings. Asked during the Franklin County meeting if they would avoid destroying the habitat of deer during breeding/birthing times and partridge during nesting/hatching time, they answered that they would not halt construction unless it was specified that they had to. This means they have no interest in working with the needs of the environment and protecting it. They will do only what is mandated.

5. If this corridor becomes a reality, it is only the beginning of applications to the State of Maine for more industrial power and other corridors in this area and beyond. The reality is, Maine is a tourism state, and people come here to experience our greatest resources – our clean water, our vast forests, our abundant wildlife, our thriving fisheries, and our vast mountain views where you can see nothing but trees, water, and other mountains for miles and miles.

6. I also feel that the people of the most affected area, The Forks area, were kept in the dark about negotiations being made by a committee handpicked by a person that CMP was working with on this starting two years ago. This committee represented the Forks area residents, without those residents and even other local select persons being made aware of this by anyone on this committee. Members of the community here feel misrepresented/unrepresented. CMP has largely downplayed this project to the public. While they've given out facts, they have not made the general person, who may not understand the lingo of the CMP world, know that just because much of the corridor is existing, it will be drastically changed from top to bottom, not just the new section. People are slowly realizing it, and now being told 'it's too late to do anything about it'.

7. In the words of a fishing guide I know: "If your business is using the resources then you do everything in your power to protect those resources. For myself and my business there is no compromise. Without these you have devalued your business and have opened the door to future developments."

For the above reasons, I request that this Petition for Intervention be granted.

Date: August 1, 2018

Noah Hale
Box 701
Jackman ,me
04945

Hinkel, Bill

From: Hawk's Nest Lodge <hawksnestlodge@gmail.com>
Sent: Wednesday, August 01, 2018 1:06 PM
To: Hinkel, Bill
Subject: Re: New England Clean Energy Connect Project - SLC-9
Attachments: Hawks Nest Letter of Intervention to LUPC.pdf

On Wed, Aug 1, 2018 at 1:05 PM, Hawk's Nest Lodge <hawksnestlodge@gmail.com> wrote:
Mr. Hinkle,

Please take into consideration this letter of intervention for the New England Clean Energy Connect Project.

Thank you,

Sarah and Peter Dostie

--

Hawk's Nest Lodge
2989 US Route 201
West Forks, ME 04985
207-663-2020
www.hawksnestlodge.com

--

Hawk's Nest Lodge
2989 US Route 201
West Forks, ME 04985
207-663-2020
www.hawksnestlodge.com

Sarah and Peter Dostie
Hawk's Nest Lodge
2989 Route 201
West Forks, ME 04985
hawksnestlodge@gmail.com
207-663-2020

Maine Land Use Planning Commission
22 State House Station
Augusta, Maine 04333-0022

Re: New England Clean Energy Connect Project - SLC-9

This letter of intervention is in reference to the new AVANGRID (CMP) transmission line corridor that is planned to be built over Coburn and Johnson Mountains. The corridor is in the view shed of our National Scenic Byway Rt. 201, through the full length of the West Forks, across the DOC and Trout Unlimited Cold Stream water shed, and across the Kennebec River Gorge in the West Forks in Somerset County.

The Hawk's Nest Lodge is concerned about the adverse environmental, scenic, and economic impacts created by the CMP project. The Hawk's Nest is highly dependent on the outdoor recreational tourist industry. In 2017 the Hawk's Nest had 15,890 visitors and on average employs 9-18 full and part time people in the area. Snowmobiling, ATV-ing, rafting, and kayaking, along with visitors to our Nat' scenic byway make up the bulk of the visitors.

It is our understanding that up to two years ago CMP contacted a single whitewater rafting outfitter in the Forks, which is a separate town not located in the Kennebec Gorge and began a mitigation process with an outside special interest group, the Western Mountains and Rivers Corp (WMRC) that led to a 22 million dollar Memorandum of Understanding. It appears the only host community in Maine to the new transmission line corridor, the West Forks, apparently was left out of that process. Both CMP and WMRC admitted this in an open public meeting in the West Forks after nearly two years.

Several businesses and organizations including the local ATV club, Snowmobile club, local fishing outfitters who make a living taking clients through the Kennebec River Gorge as well as the rest of the majority of whitewater rafting outfitters, town assessors, local paddlers, and basically everyone from the local area have been told they couldn't be part of the mitigation "or we would never get anything done", according to CMP and WMRC. It seems Trout Unlimited was also left out even though they were instrumental in the purchase of 8,000 acres of the Cold Stream watershed, one of the most important and fragile spawning habitats on the

Kennebec for Maine wild brook trout. A good portion of that watershed is in the West Forks. The transmission line corridor passes through or directly over six miles of that watershed.

It seems that an honest and open dialog between the West Forks and CMP was simply not going to happen. From the perspective of residents and businesses in the West Forks as well as most outfitters, (both rafting and fishing), paddlers and their clubs, there is vehement opposition to high tension wires with 18 giant beach balls attached as guards for aircraft hanging over the Kennebec River Gorge. These are likely only the first of the transmission lines as the corridor is being built to include room for the future lines. The profitable portion of the whitewater rafting industry is down to 12 weeks, yet, the season for private boating and fishing, is up to six months. Neither private boaters nor their representatives were contacted. The recreation and tourism based economy and life style are 24/7/365 in the West Forks. A private outside special interest group dictating our future in the West Forks is out of the question when it comes to decisions of life changing impacts such as this.

In reference to the adverse environmental and view shed impacts of the Coburn Mountain area, Coburn Mt. is the highest peak between Mt. Katahdin, and the Sugarloaf/Bigelow Mt. area, with a distance of nearly one hundred miles between. From the DOC observation tower on Coburn's peak the 360 degree view s from Canada to Katahdin, to Moosehead lake, the entire West Forks and well beyond are spectacular as is looking back at the mountain from anywhere in that view shed. Those views would also encompass miles of the transmission line corridor that come within a few hundred yards of Coburn's 3,718 ft. peak.

Coburn Mt. and ITS 89 are among the most visited destinations for snowmobiling in Maine with conservatively 10,000 snowmobilers in winter months, and a short hike for ATVers, and hikers. ITS 89 runs over the north shoulder of Coburn with open views from the Parlin Pond area throughout the West Forks, and , "Old Canada Road Nat. Scenic Byway" RT 201 a half mile away. The proposed transmission lines and their corridor run almost directly overhead of ITS 89 on the north shoulder as well as for miles before and after. The heavily traveled Johnson Mt. connector trail between Coburn and the West Forks used by both ATVs and snowmobiles will have the transmission lines either directly overhead or within nearby view. These Trails have unbroken scenic panoramic views to the horizon. ITS 89 is the only link for snowmobiles in northern Maine between the Ranglely area, past Grand Falls, over the 165 ft. Spencer Stream snowmobile bridge, and to the Jackman, Rockwood, West Forks, and Moosehead lake region.

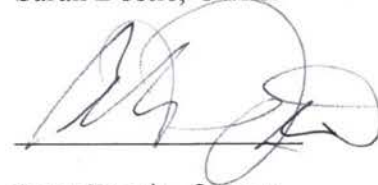
What has been called the Coburn Wilderness Trail will have miles of that transmission line corridor basically in your face or directly overhead. In addition to the long-term negative impacts to the land, construction of these large towers could disrupt snowmobile and ATV traffic with negative impacts to tourism and recreation throughout the region. The Coburn Summit Riders were not contacted by CMP for any sort of mitigation.

If allowed to intervene, we intend to participate fully as a party in this proceeding

Respectfully.

A handwritten signature in black ink, appearing to read "Sarah Dostie", written over a horizontal line.

Sarah Dostie, Owner

A handwritten signature in black ink, appearing to read "Peter Dostie", written over a horizontal line.

Peter Dostie, Owner

Date: August 2, 2018

Hinkel, Bill

From: Buxton, Anthony W. <ABuxton@preti.com>
Sent: Wednesday, August 01, 2018 4:56 PM
To: Hinkel, Bill
Subject: Petition to Intervene of IECG re NECEC LUPC
Attachments: IECG CMP NECEC LUPC Petition to Intervene Cover Letter.pdf; IECG LUPC NECEC Intervention Petition.pdf

Good Evening,

Please see attached Cover Letter and Petition to Intervene of Industrial Energy Consumer Group.

Thank you,

Anthony W. Buxton
Chair, Energy Group | Co-Chair, Climate Strategy Group
207.623.5300 Tel
abuxton@preti.com
[Bio](#) | [LinkedIn](#) | [Twitter](#) | [preti.com](#)

PretiFlaherty
45 Memorial Circle
P.O. Box 1058
Augusta, ME 04332-1058

This E-Mail may contain information that is privileged, confidential and / or exempt from discovery or disclosure under applicable law. Unintended transmission shall not constitute waiver of the attorney-client or any other privilege. If you are not the intended recipient of this communication, and have received it in error, please do not distribute it and notify me immediately by E-mail at abuxton@preti.com or via telephone at 207.623.5300 and delete the original message. Unless expressly stated in this e-mail, nothing in this message or any attachment should be construed as a digital or electronic signature or as a legal opinion.

August 1, 2018

VIA E-MAIL

Mr. Bill Hinkel
Permitting and Compliance Regional Supervisor
Maine Land Use Planning Commission
22 State House Station
Augusta, Maine 04333-0022

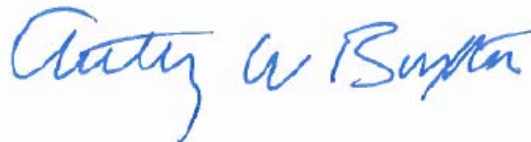
**RE: Petition to Intervene of Industrial Energy Consumer Group in Central
Maine Power Company's New England Clean Energy Connect project.**

Site Law Certification, SLC-9

Dear Mr. Hinkel:

Enclosed for filing, please find the Petition to Intervene of Industrial Energy Consumer Group ("IECG") in the above proceeding involving Central Maine Power Company's ("CMP") New England Clean Energy Connect project ("NECEC").

Sincerely,



Anthony W. Buxton,
Counsel to Industrial Energy Consumer Group

**STATE OF MAINE
LAND USE PLANNING COMMISSION**

Central Maine Power Company)	PETITION TO INTERVENE
New England Clean Energy Connect Project)	OF
Site Law Certification, SLC-9)	INDUSTRIAL ENERGY
_____)	CONSUMER GROUP
)	
)	
)	

The Maine Land Use Planning Commission (“Commission”) will hold a public hearing and seek public comment regarding portions of Central Maine Power Company’s (“CMP”) New England Clean Energy Connect project (the “Project”) located within the Recreation Protection (P-RR) subdistrict. As part of its proposal, CMP seeks to install a new high-voltage direct current electric transmission line that would traverse three separate P-RR subdistricts.¹ The Commission must certify to the Maine Department of Environmental Protection whether the Project is an allowed use within such subdistricts and whether the Project meets any land use standards established by the Commission that are not duplicative of those considered by DEP under the Site Location of Development Law.² Within a P-RR subdistrict, a “utility facility” may be allowed by special exception if the applicant shows by substantial evidence that:

- (a) there is no alternative site which is both suitable to the proposed use and reasonably available to the applicant;
- (b) the use can be buffered from those uses within the vicinity or area likely to be affected by the proposal with which it is or may be incompatible; and
- (c) such other conditions are met that the Commission may reasonably impose in accordance with the policies of the Comprehensive Land Use Plan.³

¹ Maine Land Use Planning Commission, Notice of Public Hearing and Opportunity to Intervene, Central Maine Power Company’s New England Clean Energy Connect Site Law Certification (issued July 12, 2018), at 1.

² 12 M.R.S. § 685-B(1-A)(B-1).

³ Maine Land Use Planning Commission, 01-672, Chapter 10, Sub-Chapter II, Section 10.23,I,3,d,8.

The purpose of the public hearing is to present testimony and evidence as to whether the Project meets the special exception criteria for the P-RR subdistrict.⁴

Industrial Energy Consumer Group (“IECG”) hereby submits this Petition to Intervene as a party in the above proceeding. IECG “may be substantially and directly affected by the proceeding,” as demonstrated below, and therefore the Commission should grant IECG intervention.⁵

I. IECG Has a Substantial and Direct Interest in the Proceeding

a. Who is IECG?

IECG was formed in 1985 as an incorporated association under Maine law to represent Maine industrial energy consumers and consumer-generators before state, federal, and regional regulatory, legislative, and congressional bodies on energy-related issues. Since 1985, IECG has participated in hundreds of regulatory proceedings affecting the price, diversity, origins, reliability, and effects of Maine’s energy supplies. The group is a collective voice that actively works to diversify the sources and lower the costs of energy in New England, including electricity, through well designed and monitored competitive energy markets that benefit energy users and the environment. No other similarly experienced or effective consumer energy organization exists in New England. IECG’s members have operations in the CMP service territory, many other states, and several nations.

IECG is substantially and directly affected by this proceeding because the Project is a reasonable and well-timed solution to New England’s energy trilemma of needing to reduce energy costs while minimizing environmental harm (including harm to recreational aspects of the natural environment) and maintaining reasonable energy reliability (including diverse sources of

⁴ Public Notice, *supra* note 1, at 1.

⁵ Maine Land Use Planning Commission, 01-072, Chapter 5, Section 5.13(1) (“A petition to intervene shall be granted if it demonstrates that the petitioner is or may be substantially and directly affected by the proceeding.”)

supply and the infrastructure and market mechanisms necessary to serve energy consumers). Reasonably priced and reliable electricity supply is critical to the success of IECG's members. The Project, if approved, will diversify New England's energy supply; lower energy costs, especially in winter; enhance reliability (which is costly to attain and even costlier to forego), especially in winter; facilitate the efficient integration of large-scale renewable energy projects into New England's energy supply; and help to cost-effectively fulfill regional environmental policies. For example, CMP predicts the Project will lower the year-round average locational marginal electricity price in ISO New England ("ISO-NE") by 3.5 mils/kWh for Maine consumers. For a representative large Maine industrial consumer, such a price reduction amounts to a savings of about \$350,000/year. Other Maine consumers would save proportionately to their usage. Such savings on energy costs is both welcome and rare, as Maine consumers pay some of the highest energy costs in the continental United States.

b. IECG Has Substantial Energy Experience.

IECG's experience helping to create, participating in, and reforming ISO NE energy markets can help elucidate potential project benefits in the context of potential environmental costs in Maine and alternatives to meeting the region's energy needs, particularly during the highly dynamic energy transformation underway. ISO NE is the independent, not-for-profit company authorized by the Federal Energy Regulatory Commission to perform three interrelated tasks with respect to the New England region: (1) operate the high-voltage electric grid; (2) design and administer competitive energy markets; and (3) plan for reliably meeting regional electricity needs in the future. IECG's participation will be particularly useful here, where the Project's energy and capacity will be purchased by Massachusetts but the infrastructure will be in Maine. IECG understands the benefits of the Project to Maine consumers in the context of a

regional market. By aiming to deliver up to 1,200 megawatts of hydropower from Hydro-Quebec into New England's electric grid by 2022, the Project comes at a critical inflection point for energy and reliability in New England, when the impacts of a project must be considered in the context of significant ongoing energy market turmoil, recent and proposed reformations, and sweeping state policy changes.

c. A Regional Energy “Transformation” is Underway.

ISO NE describes the regional power system as “undergoing a rapid transformation.”⁶ A “‘hybrid grid’ is emerging—the region is changing how it generates, delivers, and uses electricity.”⁷ Based on its significant experience, IECG believes that states cannot ignore energy costs by considering environmental goals or reliability in isolation. Rather, costs and environmental impacts must be optimally minimized while reasonably priced electricity supply is maintained. The Project is a reasonable and well-timed solution to this trilemma during New England's unavoidable and rapid energy transformation.

For years IECG has argued that inadequate gas pipeline capacity for both heating and electricity during winter would increase costs (and decrease reliability). Using the \$5.2 billion paid for electricity in 2012 as a baseline, New England has paid an aggregate electricity premium of over \$7 billion from 2013 to 2015 due to winter pipeline constraints.⁸ This needless premium is deceiving because it also includes historically low energy prices during the summer and shoulder months, when lost-cost Marcellus Shale gas supply to New England is unconstrained. It also does not account for the harsh winter of 2017-18, when the Massachusetts Natural Gas

⁶ ISO New England, “*ISO New England Overview and Regional Update*” to the Massachusetts General Court and Clean Energy Caucus (May 8, 2018), at slide 2.

⁷ *Id.*

⁸ See, e.g., ISO New England, *2017 Report of the Consumer Liaison Group* (February 28, 2018), at 27.

Index price reached \$78.35/MMBtu (*c.f.* Marcellus Shale gas at \$5.75/MMBtu) and New England electricity prices spiked to \$287.85/MWh.⁹

Despite these destructive price impacts, reasonable pipeline solutions have been thwarted. ISO NE was forced to develop an emergency “stop-gap” solution from 2013-14 through 2017-18 called the Winter Reliability Program under which consumers paid roughly \$200 million for out-of-market oil to ensure system reliability.¹⁰ The Winter Reliability Program was intended to be a bridge to the Pay-for-Performance (“PFP”) market reform. Before PFP could even be phased in on June 1, 2018, however, ISO NE sounded a new alarm with its “Operational Fuel-Security Analysis” issued January 17, 2018, warning of brownouts and possible blackouts due to, *inter alia*, retirement of generation capacity with on-site fuel, limited oil storage, and uncertain LNG availability. The announced retirement of Exelon Generation’s Mystic Units 8 & 9, with implications for the adjacent LNG import terminal, exacerbated ISO NE’s concerns. Thus, ISO NE has sought a “fuel-security” waiver from the Federal Energy Regulatory Commission (“FERC”) to sign a two-year reliability contract to keep Mystic Units 8 & 9 operational through 2024. Such an out-of-market contract would likely cost New England consumers at least another \$400 million. Though FERC recently rejected the first waiver request, it provided ISO NE the opportunity to remedy its potentially unjust and unreasonable tariff to address demonstrated regional fuel security concerns.¹¹ IECG expects similar above-market price impacts.

Against this price and reliability crisis backdrop, ISO NE plans other major market reforms, including, for example: (1) the so-called Competitive Auctions with Sponsored Policy

⁹ ISO New England, Winter 2017/18 recap: Historic cold snap reinforces findings in Operational Fuel-Security Analysis.

¹⁰ <http://isonewswire.com/updates/2014/4/4/oil-inventory-was-key-in-maintaining-power-system-reliabilit.html>; <http://isonewswire.com/updates/2015/4/7/new-england-power-system-performed-well-through-winter-20142.html>; <https://www.iso-ne.com/markets-operations/markets/winter-program-payment-rate>.

¹¹ ISO New England Inc., 64 FERC ¶ 61,003 (July 2, 2018).

Resources (CASPR) (designed to accommodate state-subsidized procurements of renewables into capacity markets, while protecting competitive pricing mechanisms that sufficiently attract new and sustain existing power resources); (2) full integration of demand response resources; and (3) a potential “re-calibration” of PFP to correct flawed assumptions about dual-fuel capacity and LNG availability. As these reforms take shape, ISO NE must also account for expanding state policy goals, including (1) the planned procurement by New England states of more than 2,000 MW of offshore wind at likely out-of-market costs; (2) further state subsidization of solar PV and energy efficiency resources; (3) newly proposed emissions and siting limitations for thermal power plants; and (4) proposals to increase Renewable Portfolio Standards or/and RGGI emissions caps.

This energy market and policy overview demonstrates, summarily, the “transformation” underway and underscores that the Project is proposed at a time of great need and confusion in New England. The Commission would benefit in this proceeding from IECG’s energy perspective as Maine energy consumers, particularly because IECG can elucidate Project benefits and costs in light of alternatives and the status quo within New England’s evolving energy marketplace. The Commission’s decision to certify the Project or not will have substantial and direct impacts on the region’s energy markets and thus Maine’s largest energy consumers, IECG’s members. Further, IECG can help the Commission make a more informed and efficient decision, preventing unreasonable or costly conditions and delay that could lead to a Northern Pass-type situation in Maine and helping to fulfill Governor LePage’s call to “Look North” for economic growth and opportunity.¹²

¹² “Governor LePage Calls upon Mainers to ‘Look North’ for Economic Growth and Opportunity” (May 14, 2018), available at <https://www.maine.gov/governor/lepage/newsroom/article.html?id=797569>.

d. There is no Suitable, Reasonably Available Alternative to the Project.

IECG contends, and is prepared to submit evidence regarding, that there is “no alternative site which is both suitable to the proposed use and reasonably available to the applicant” based on its significant energy experience in New England and within the ISO NE framework. CMP proposes to co-locate the vast majority of the Project in existing transmission corridors, thereby minimizing general impact to P-RR subdistricts. Though the Project will traverse three P-RR subdistricts, its location is suitable given its timing, scale, and the regional energy need it would meet. It would be unreasonable to require CMP to substantially re-route the Project and thereby reduce the portion of the Project to be co-located.

The Project is proposed to cross the Kennebec River by overhead span near Moxie Falls and the Cold Stream Forest (“Kennebec River Crossing”). IECG contends that undergrounding the wire here would create unreasonable expense and delay, while potentially disrupting the natural river habitat to a greater degree than is necessary. CMP proposes to place the pole structures far enough from the river, with substantial naturally vegetated buffer zones between the pole structures and river, such that recreational river-goers would not be able to see the pole structures. IECG notes that recreators in the general area of the Kennebec River Crossing do so with the substantial benefit of Maine’s largest hydroelectric project, Harris Dam, which regulates water flows and thereby increases boating and fishing opportunities in summer, when water levels would otherwise naturally decrease.

The “Brookfield Alternative” to the desired crossing route would nearly double the amount of utility infrastructure and land needed for the Project to cross the Kennebec River relative to the Kennebec River Crossing. It would require circumnavigating Dead Stream Pond, spanning the impoundment near Harris Dam, and crossing two branches of Moxie Stream

proximate to the northern terminus of Moxie Pond. IECG contends that this alternative would create unreasonable expense and delay, while possibly even increasing adverse impacts.

II. Conclusion

Because IECG and its members will be substantially and directly affected by the Commission's certification decision in this proceeding, IECG has satisfied the requirements for intervention under the Commission's regulations and respectfully requests to be granted Intervenor status. IECG's broad energy experience can assist the Commission in weighing the costs and benefits of the Project's proposed location and possible alternatives.

DATED: August 1, 2018

Respectfully submitted,

INDUSTRIAL ENERGY CONSUMER GROUP




By: Robert Dorko, President
Industrial Energy Consumer Group
P.O. Box 5117
Augusta, Maine 04333

Anthony W. Buxton and R. Benjamin Borowski,
Counsel to the Industrial Energy Consumer Group
Preti Flaherty Beliveau & Pachios LLP
P.O. Box 1058, 45 Memorial Circle
Augusta, ME 04332
Telephone: 207-623-5300
Fax: 207-623-2914

State of Maine
County of Kennebec

Before me on this 1st day of August, 2018, personally appeared the above-subscribed Robert Dorko, and made oath that the statements contained are true and correct to the best of his knowledge, information and belief.



Signed:
Notary Public, Maine
My Commission Expires:

Hinkel, Bill

From: Linda <mtsea_04578@yahoo.com>
Sent: Wednesday, August 01, 2018 6:05 PM
To: Hinkel, Bill
Subject: NECEC Project
Attachments: LURC.txt

Please find attached letter regarding proposed CMP powerline corridor.

Thank you!

----- Linda -----

LURC.txt

Re: Petition to Intervene in New England Clean Energy Connect Project - SLC-9;
August 1,2018

Dear Land Use Planning Commission,

Please find this letter emailed as a petition to intervene in Central Maine Power's (CMP's) application for a Site Location of Development Act permit and a Natural Resources Protection Act permit for the New England Clean Energy Connect (NECEC) high voltage direct current (HVDC) transmission line running from the Québec-Maine Border to Lewiston and related network upgrades.

My name is Linda Lee I have a camp off Mile 10 of the Hardscrabble Road and have owned land there since 1994.

I chose this area for my cabin because of it's unspoiled beauty...mountains,woods,rivers,streams,ponds,wildlife. We lost some of that natural unspoiled beauty already when the turbines were put in the Kibby Mountain area. We don't need the total area destroyed. The amount of construction and destruction that will take place if this project is approved is tremendous.

The area that this powerline corridor is proposed to go is priceless. Just because an area is not seen by millions of people,doesn't mean it is worthless and deserves something as unsightly and potentially harmful to wildlife...including fish..as these lines.

People go to the area because of it's beauty and wildness...hunting,fishing,hiking,paddling kayaks and canoes,photography and relaxing. They don't want to see powerlines going over rivers and through the forest.

There are many who work in the outdoors in these areas who have very troubling concerns about the impact it will have on their businesses.

There are many environmental groups who also have troubling concerns about the impact it will have on the animals,birds,fish. ...AMC, Maine Audubon Society,Maine Wilderness Guides,Trout Unlimited,Inland Fisheries and Wildlife,Friends of Boundry Mountains,The Nature

Conservancy,Natural Resources Council of Maine and more...experts in their areas.

Maine will not benefit from this project. Why do we have to sacrifice more to provide energy to a state who refused to consider alternatives in their own state ?

Please look at all the facts,the concerns and the impact this will have on this part of the state. CMP doesn't care,but there are thousands of us that do!

Thank you!

Linda Lee
603 Dead River Road
Bowdoin,Maine
207-615-8813

Hinkel, Bill

From: Kim Lyman <klyman9672@gmail.com>
Sent: Wednesday, August 01, 2018 3:39 PM
To: Hinkel, Bill
Cc: klyman9672@gmail.com
Subject: Petition to Intervene in New England Clean Energy Connect Project - SLC-9
Attachments: LUPC petition to intervene CMP.docx

Good afternoon,

Please find attached a petition to intervene in Central Maine Power's application for a Site Location of Development Act permit and a Natural Resources Protection Act Permit for the NECEC high voltage direct current transmission line running from the Quebec - Maine Border to Lewiston, ME, and related network upgrades.

Sincerely,

Kimberly Lyman
Caratunk, ME
207-672-4099

State of Maine
Land Use Planning Commission
22 State House Station
Augusta, Maine 04333-0022

Re: Petition to Intervene in New England Clean Energy Connect Project - SLC-9;

Dear Land Use Planning Commission,

Please find this written letter, emailed and postal mailed, as a petition to intervene in Central Maine Power's (CMP's) application for a Site Location of Development Act permit and a Natural Resources Protection Act permit for the New England Clean Energy Connect (NECEC) high voltage direct current (HVDC) transmission line running from the Québec-Maine Border to Lewiston and related network upgrades.

My name is Kimberly Lyman. I've lived in the town of Caratunk for 20 years. This is one of the many towns across the State of Maine affected by the proposed corridor. I spend most of my free time biking, hiking, rafting, and fishing in Caratunk/Forks area. As a long time guide, I love to share this beautiful area with visitors from all over the United States and often from other countries. My concerns for this project are not only for the area that I live but for the entire State of Maine.

1. The Caratunk/Forks area's economy relies almost exclusively on recreational tourism. This project will put 1000' of powerline (with large aircraft guards) across the Kennebec River, where my husband, a fly fishing guide, along with his partners takes their guests on wilderness fishing trips. Their guests often comment on the serenity of the river, and the fact that they've been able to be somewhere for hours and hours without seeing anything manmade. People come to raft either privately or with the many rafting companies (and spend money in town), and many others come to just simply enjoy the river. In addition, this power line will be visible from the summits of most of the local mountains, the Old Canada Road Scenic Byway, and much of ITS 89 (a major snowmobile trail utilized by many of the businesses here). This interruption to the scenic view is a direct negative impact on recreational tourism, and in turn, to these businesses that support this community.

2. This project does not benefit the Maine taxpayer with lower rates or cleaner energy. NECEC may increase greenhouse gas emissions. I personally have an interest in lower energy costs and clean energy sources for my community and for the people of Maine.

3. This project is not financially beneficial to Maine's economy or its residents. The PUC found that the CMP project application boasts inflated economic and financial benefits. They reported that the project will suppress existing and future renewable energy generation in Maine due in part to increased congestion on the transmission line. In their letter, these legislators also expressed the negative impacts on wildlife, forests, and clean water.

4. NECEC, as proposed, would negatively affect wildlife. The proposed corridor would require significant clearing through sensitive habitat, including habitat for many rare species, as well as ecologically and economically important species like Brook Trout and White-tailed Deer. The proposal would affect more than 1,000 acres of wetland, cross 115 streams and scores of vernal pools, and degrade approximately 20 acres of inland waterfowl and wading bird habitat. I sat in on two of the CMP informational meetings. Asked during the Franklin County meeting if they would avoid destroying the habitat of deer during breeding/birthing times and partridge during nesting/hatching time, they answered that they would not halt construction unless it was specified that they had to. This means they have no interest in working with the needs of the environment and protecting it. They will do only what is mandated.

5. If this corridor becomes a reality, it is only the beginning of applications to the State of Maine for more industrial power and other corridors in this area and beyond. The reality is, Maine is a tourism state, and people come here to experience our greatest resources – our clean water, our vast forests, our abundant wildlife, our thriving fisheries, and our vast mountain views where you can see nothing but trees, water, and other mountains for miles and miles.

6. I also feel that the people of the most affected area, The Forks area, were kept in the dark about negotiations being made by a committee handpicked by a person that CMP was working with on this starting two years ago. This committee supposedly represented the Forks area, yet several local selectpersons have stated that they were not made aware of this by anyone on this committee. Members of the community here feel misrepresented about how they felt about this plan. CMP has largely downplayed this project to the public. While they've given out facts, they have not made the general person, who doesn't maybe understand the lingo of the CMP world, know that just because much of the corridor is existing, it will be drastically changed. People are slowly realizing it, and now being told 'it's too late to do anything about it'.

7. My husband is a fishing guide here. His income depends on the health and pureness of the Kennebec River Gorge. In the words of a fishing guide I know: "If your business is using the resources then you do everything in your power to protect those resources. For myself and my business there is no compromise. Without these you have devalued your business and have opened the door to future developments."

If granted leave to intervene, I intend to participate as a party in this proceeding.

The economic benefit of this project is overstated, while the environmental impact is underestimated. While this project will be very lucrative for CMP and hydro producers in Canada, this is a bad deal for Maine's residents, wilderness, and wildlife.

For the above reasons, I request that this Petition for Intervention be granted.

Date: August 1, 2018

Respectfully submitted,

Kimberly Lyman

30 River Rd.

Caratunk, ME 04925

207-672-4099

Klyman9672@gmail.com

Hinkel, Bill

From: Mike Pilsbury <mspils15@hotmail.com>
Sent: Wednesday, August 01, 2018 8:29 PM
To: Hinkel, Bill
Subject: petition to intervene CMP corridor over kennebec river gorge

From: Mike Pilsbury, Guide/Owner

Kennebec River Angler

111 Main St

Caratunk, ME 04925

7/19/2018

This is a petition for leave to intervene. in reference to, the new AVANGRID (CMP) transmission line corridor that is planned to be built over The Kennebec River Gorge and across the DOC and Trout Unlimited Cold Stream water shed.

As a Registered Master Maine Guide, and Co-Owner or Kennebec River angler, (the only outfitter offering guided Fishing trips on the section of the Kennebec where the proposed power line will cross), I am concerned this development may adversely affect our business and other businesses in the area. I also believe it may have a detrimental impact on the Kennebec River fishery and the tributaries in the region.

From the information I have, it seems that CMP has had secret negotiations with the self- serving group, Western Mountains and Rivers Corp.

This group claims to represent many of the outfitters and businesses that may be affected by this development, but has actually placed their own interests at the forefront of discussions and negotiations. Private sales of CMP lands to individual members of this corporation, for example.

I believe additional members of the community and other businesses in our area should be consulted and have input regarding the environmental and commercial impact of the proposed powerline.

Mike Pilsbury

7/19/18

Hinkel, Bill

From: Alison Quick <alison.quick0487@gmail.com>
Sent: Wednesday, August 01, 2018 12:04 PM
To: Hinkel, Bill
Subject: Petition to Intervene in New England Clean Energy Connect Project - SLC-9

State of Maine

Land Use Planning Commission

22 State House Station

Augusta, Maine 04333-0022

Re: Petition to Intervene in New England Clean Energy Connect Project - SLC-9;

Dear Mr. Beyer,

Please find this written letter via email as a petition to intervene in Central Maine Power's (CMP's) application for a Site Location of Development Act permit and a Natural Resources Protection Act permit for the New England Clean Energy Connect (NECEC) high voltage direct current (HVDC) transmission line running from the Québec-Maine Border to Lewiston and related network upgrades.

I live in the town of Winslow, but I spend most of my free time hiking, rafting, canoeing, and fishing in Caratunk/Forks area, and I love to share this beautiful area with visitors from all over the United States and beyond. My concerns for this project are not only for the area that I live but also for the State of Maine.

1. The Caratunk/Forks area's economy relies almost exclusively on recreational tourism. This project will put 1000' of powerline (with large aircraft guards) across the Kennebec River, where local fly fishing guides take their guests on wilderness fishing trips, commercial and non-commercial people come to raft (and spend money in town), and many others come to just simply enjoy the river. In addition, this power line will be visible from the summits of most of the local mountains, the Old Canada Road Scenic Byway, and much of ITS 89 (a major snowmobile trail utilized by many of the businesses here). This interruption to the scenic view is a direct negative impact on recreational tourism, and in turn, to these businesses that support this community.
2. This project does not benefit the Maine taxpayer with lower rates or cleaner energy. NECEC may increase greenhouse gas emissions. I personally have an interest in lower energy costs and clean energy sources for my community and for the people of Maine.
3. CMP's transmission line would do little to reduce the pollution that causes climate change. CMP's line would transmit power from HydroQuebec, who has not demonstrated that the power transmitted by this project will result in a true and verifiable reduction in greenhouse gas emissions, rather than simply shifting existing power from one market to another.
4. This project is not financially beneficial to Maine's economy or its residents. The PUC found that the CMP project application boasts inflated economic and financial benefits. They reported that the project will suppress existing and future renewable energy generation in Maine due in part to increased congestion on the transmission line. In their letter, these legislators also expressed the negative impacts on wildlife, forests, and clean water.

5. NECEC, as proposed, would negatively affect wildlife. The proposed corridor would require significant clearing through sensitive habitat, including habitat for many rare species, as well as ecologically and economically important species like Brook Trout and White-tailed Deer. The proposal would affect more than 1,000 acres of wetland, cross 115 streams and scores of vernal pools, and degrade approximately 20 acres of inland waterfowl and wading bird habitat.

6. If this corridor becomes a reality, it is only the beginning of applications to the State of Maine for more industrial power and other corridors in this area and beyond. The reality is, Maine is a tourism state, and people come here to experience our greatest resources – our clean water, our vast forests, our abundant wildlife, our thriving fisheries, and our vast mountain views where you can see nothing but trees, water, and other mountains for miles and miles.

If granted leave to intervene, I intend to participate as a party in this proceeding.

The economic benefit of this project is overstated, while the environmental impact is underestimated. While this project will be very lucrative for CMP and hydro producers in Canada, this is a bad deal for Maine's residents, wilderness, and wildlife.

For the above reasons, I request that this Petition for Intervention be granted.

Respectfully submitted,

Alison Quick

66 Cushman Road

Winslow, ME 04901

774-722-0617

Hinkel, Bill

From: Eric Sherman <eshermanbpr@gmail.com>
Sent: Wednesday, August 01, 2018 10:41 PM
To: Hinkel, Bill
Subject: NECEC- Petition to Intervene
Attachments: Sherman_Eric_IntervenorLetter.docx

Dear Mr. Hinkel,

Please find attached my petition to intervene in CMP's NECEC project. I have attached a Google Doc, and in Word, and placed the letter here in the email.

Thank you,

Eric J. Sherman

 [Sherman_Eric_IntervenorLetter](#)

State of Maine
Land Use Planning Commission
22 State House Station
Augusta, Maine 04333-0022
Re: Petition to Intervene in New England Clean Energy Connect Project - SLC-9;

Dear Land Use Planning Commission,

Please find this email as a petition to intervene in Central Maine Power's (CMP's) application for a Site Location of Development Act permit and a Natural Resources Protection Act permit for the New England Clean Energy Connect (NECEC) high voltage direct current (HVDC) transmission line running from the Québec-Maine Border to Lewiston and related network upgrades.

My name is Eric J. Sherman. I was born in Greenville and have lived in Maine all but four of my 55 years. I am currently in my thirty-third year as an active registered Maine Whitewater Guide, and have also been a registered Maine Recreational Guide for over twenty years. I'm also a teacher at Greenville Schools. I hike, bike, ski, snowshoe, kayak, canoe, and raft in Maine's vast wilderness. I spend a large portion of time from May through October working on the Kennebec and Dead rivers in The Forks area. I love Maine's wilderness, and I love sharing it with the people who come to this area for rafting, camping, sightseeing, and vacationing. I have concerns for the experiences of the guests who book raft trips on the Kennebec River, concerns for the other waterways and wildlife that will be affected, and concerns that CMP has not been forthright about this project.

1. When I bring my crew to where we load the rafts at Harris Station Dam, my crews (and I) are awestruck at the enormity of the dam. I share the history of the dam, the natural history of the area, and the specifics of the hydropower generation of Harris Station. Believe me, the irony that a dam which drastically altered the landscape 65+ years ago is not lost on me. But it is what it is, and I'm looking forward. Except for the stairs at Carry Brook, once we leave the dam, people don't see a man-made structure until we hit the ball field where we see the bridge and some houses. The company I've worked for (since 2001), Moxie Outdoor Adventures, has its lunch site just upstream of where the proposed lines will cross the river. Those lines will be visible from our lunch site, and will be an eyesore that detracts from the wilderness experience of my guests, the other guests, the other guides, and me. People don't leave their homes in Boston and its suburbs, and Southern

Maine and its developed areas to go to a place that looks like an industrial park, especially when they expect a wilderness experience.

2. I am also very concerned for the wilderness, waterways, and wildlife that the powerline will affect from the Maine/Canada border all the way to Lewiston. I read an article that summarized the following about CMP's plan: "CMP's proposed line includes above-ground transmission lines across 263 wetlands, 115 streams, 12 inland waterfowl and wading bird habitat areas, the Kennebec River Gorge, the Appalachian Trail, and near Beattie Pond, a Class 6 remote pond." This is unacceptable. My family owns a camp on Moosehead Lake, and we're not allowed to cut a six inch diameter tree within 100 feet of the water for fear of an impact on the water and wildlife. How can anyone justify the devastation that the 145 mile NECEC project will cause to the environment, when a single tree cut too close to Moosehead's shoreline causes a fine? In addition, CMP has not presented any evidence of a reduction in gas emissions. This is not a clean energy project. I'm also concerned that if the powerline is allowed, then a precedent will have been set, and what will stop developers from building more transmission lines, gas lines, roads, bridges, cabins, condominiums, resorts, and who knows what else? Finally, the Central Maine Power and Western Mountains & Rivers Joint Statement says that, "CMP proactively sought mitigation ideas that would help western Maine achieve its potential as a hub for outdoor recreation." The people who participated in these mitigation ideas were hand-picked and did not represent the rafting community as a whole (or the populations of The Forks, West Forks, and Caratunk). There is a perception of shady backroom deals going on with those who were handpicked by CMP. Another perception is that those people were misled by CMP and told that NECEC was a done deal and that these mitigation ideas were a last ditch effort for locals to get something out of this project. News of this project emerged in the non-handpicked river community in early fall 2017, but those talks had been going on much longer than that. A final perception is that this project was purposefully kept on the downlow to minimize the time opponents would have to organize against it.

4. If granted leave to intervene, I, Eric J. Sherman intend to participate fully as a party in this proceeding.

5. Maine's wildlife, wilderness, and waterways will be substantially and directly affected by the NECEC project. We cannot let this happen.

For the above reasons, I, Eric J. Sherman, request that this Petition for Intervention be granted.

August 2, 2018

Respectfully submitted,

Eric J. Sherman
PO Box 124
23 Birch Point Road
Greenville, ME 04441
207-695-4434
eshermanbpr@gmail.com

State of Maine
Land Use Planning Commission
22 State House Station
Augusta, Maine 04333-0022
Re: Petition to Intervene in New England Clean Energy Connect Project - SLC-9;

Dear Land Use Planning Commission,

Please find this email as a petition to intervene in Central Maine Power's (CMP's) application for a Site Location of Development Act permit and a Natural Resources Protection Act permit for the New England Clean Energy Connect (NECEC) high voltage direct current (HVDC) transmission line running from the Québec-Maine Border to Lewiston and related network upgrades.

My name is Eric J. Sherman. I was born in Greenville and have lived in Maine all but four of my 55 years. I am currently in my thirty-third year as an active registered Maine Whitewater Guide, and have also been a registered Maine Recreational Guide for over twenty years. I'm also a teacher at Greenville Schools. I hike, bike, ski, snowshoe, kayak, canoe, and raft in Maine's vast wilderness. I spend a large portion of time from May through October working on the Kennebec and Dead rivers in The Forks area. I love Maine's wilderness, and I love sharing it with the people who come to this area for rafting, camping, sightseeing, and vacationing. I have concerns for the experiences of the guests who book raft trips on the Kennebec River, concerns for the other waterways and wildlife that will be affected, and concerns that CMP has not been forthright about this project.

1. When I bring my crew to where we load the rafts at Harris Station Dam, my crews (and I) are awestruck at the enormity of the dam. I share the history of the dam, the natural history of the area, and the specifics of the hydropower generation of Harris Station. Believe me, the irony that a dam which drastically altered the landscape 65+ years ago is not lost on me. But it is what it is, and I'm looking forward. Except for the stairs at Carry Brook, once we leave the dam, people don't see a man-made structure until we hit the ball field where we see the bridge and some houses. The company I've worked for (since 2001), Moxie Outdoor Adventures, has its lunch site just upstream of where the proposed lines will cross the river. Those lines will be visible from our lunch site, and will be an eyesore that detracts from the wilderness experience of my guests, the other guests, the other guides, and me. People don't leave their homes in Boston and its suburbs, and Southern Maine and its developed areas to go to a place that looks like an industrial park, especially when they expect a wilderness experience.

2. I am also very concerned for the wilderness, waterways, and wildlife that the powerline will affect from the Maine/Canada border all the way to Lewiston. I read an article that summarized the following about CMP's plan: "CMP's proposed line includes above-ground transmission lines across 263 wetlands, 115 streams, 12 inland waterfowl and wading bird habitat areas, the Kennebec River Gorge, the Appalachian Trail, and near Beattie Pond, a Class 6 remote pond." This is unacceptable. My family owns a camp on Moosehead Lake, and we're not allowed to cut a six inch diameter tree within 100 feet of the water for fear of an impact on the water and wildlife. How can anyone justify the devastation that the 145 mile NECEC project will cause to the environment, when a single tree cut too close to Moosehead's shoreline causes a fine? In addition, CMP has not presented any evidence of a reduction in gas emissions. This is not a clean energy project. I'm also concerned that if the powerline is allowed, then a precedent will have been set, and what will stop developers from building more transmission lines, gas

lines, roads, bridges, cabins, condominiums, resorts, and who knows what else? Finally, the Central Maine Power and Western Mountains & Rivers Joint Statement says that, ““CMP proactively sought mitigation ideas that would help western Maine achieve its potential as a hub for outdoor recreation.” The people who participated in these mitigation ideas were hand-picked and did not represent the rafting community as a whole (or the populations of The Forks, West Forks, and Caratunk). There is a perception of shady backroom deals going on with those who were handpicked by CMP. Another perception is that those people were misled by CMP and told that NECEC was a done deal and that these mitigation ideas were a last ditch effort for locals to get something out of this project. News of this project emerged in the non-handpicked river community in early fall 2017, but those talks had been going on much longer than that. A final perception is that this project was purposefully kept on the downlow to minimize the time opponents would have to organize against it.

4. If granted leave to intervene, I, Eric J. Sherman intend to participate fully as a party in this proceeding.

5. Maine’s wildlife, wilderness, and waterways will be substantially and directly affected by the NECEC project. We cannot let this happen.

For the above reasons, I, Eric J. Sherman, request that this Petition for Intervention be granted.

August 2, 2018
Respectfully submitted,

Eric J. Sherman
PO Box 124
23 Birch Point Road
Greenville, ME 04441
207-695-4434
eshermanbpr@gmail.com

Hinkel, Bill

From: Taylor Walker <twalkerfilm@gmail.com>
Sent: Wednesday, August 01, 2018 11:31 PM
To: Hinkel, Bill
Subject: Petition to Intervene in New England Clean Energy Connect Project - SLC-9

State of Maine
Land Use Planning Commission
22 State House Station
Augusta, Maine 04333-0022

Re: Petition to Intervene in New England Clean Energy Connect Project - SLC-9;

Dear Land Use Planning Commission,

Please find this email, as a petition to intervene in Central Maine Power's (CMP's) application for a Site Location of Development Act permit and a Natural Resources Protection Act permit for the New England Clean Energy Connect (NECEC) high voltage direct current (HVDC) transmission line running from the Québec-Maine Border to Lewiston and related network upgrades.

My name is Taylor Walker. I have been a registered whitewater guide on the rivers of Maine for more than 10 years. It is the beauty and wildness of the region that has fostered a successful career in filmmaking for me. In fact, my first two films featured some of Maine's most iconic rivers and streams; Cold Stream, Moxie Stream, the Kennebec, Salmon Stream, Enchanted Stream to name a few. My films have inspired others to take up the sport of whitewater kayaking, to journey to our neck of the woods and to revel in the great Maine outdoors. I am now producing content for large outdoor brands right here in our own backyard. It is for this and many other reasons that I must wholeheartedly object to the destruction of one of the last great wildernesses on the planet. A destruction that comes with NO proven benefit to the planet or the people of New England.

I understand that as a growing population there is an ever increasing demand for infrastructure. I also understand that these things are unavoidable, and I'm not entirely against such projects. However, as this project has ZERO positive impacts for our state it truly blows my mind that we would even consider allowing such an impact on our greatest resource, the Maine outdoors.

Tourism and recreation is a multi billion dollar industry that has come to Maine more and more each year. As the stars fade over the cities of our nation and the wilderness becomes an ever increasing scarcity we must do what we can to preserve such wonderful places. We are fortunate to have such a place to even consider preserving. This powerline cuts through the middle of some of our most beautiful country. I beg anyone who disagrees to take a hike to the summit of Bald Mountain overlooking Moxie pond at sunset.

This project does not benefit the Maine taxpayer with lower rates or cleaner energy. The trend today is away from hydro as it has been proven to be incredibly destructive to river ecosystems. NECEC may actually increase greenhouse gas emissions and stall current clean renewable projects like off shore wind.

The PUC found that the CMP project application boasts inflated economic and financial benefits. They reported that the project will suppress existing and future renewable energy generation in Maine due in part to increased congestion on the transmission line. In their letter, these legislators also expressed the negative impacts on wildlife, forests, and clean water.

NECEC, as proposed, would negatively affect wildlife. The proposed corridor would require significant clearing through sensitive habitat, including habitat for many rare species, as well as ecologically and economically important species like Brook Trout and White-tailed Deer. The proposal would affect more than 1,000 acres of wetland, cross 115 streams and scores of vernal pools, and degrade approximately 20 acres of inland waterfowl and wading bird habitat. With only a 25 foot buffer as the line parallels Cold Stream habitat destruction is inevitable.

If this corridor becomes a reality, it is only the beginning of applications to the State of Maine for more industrial power and other corridors in this area and beyond. The reality is, Maine is a tourism state, and people come here to experience our greatest resources – our clean water, our vast forests, our abundant wildlife, our thriving fisheries, and our vast mountain views where you can see nothing but trees, water, and other mountains for miles and miles.

If granted leave to intervene, I intend to participate as a party in this proceeding.

The economic benefit of this project is overstated, while the environmental impact is underestimated. While this project will be very lucrative for CMP and hydro producers in Canada, this is a bad deal for Maine's residents, wilderness, and wildlife.

For the above reasons, I request that this Petition for Intervention be granted.

Date: August 1, 2018

Respectfully submitted,
Taylor Walker

PO Box 187

Wyman, ME 04982

twalkerfilm@gmail.com

2079398741

Hinkel, Bill

From: Corinna Rodrigue <Corinna.Rodrigue@SoltanBass.com>
Sent: Wednesday, August 01, 2018 11:00 AM
To: Hinkel, Bill
Cc: Benjamin Smith
Subject: New England Clean Energy Connect - Petition for Leave to Intervene and Comments of Western Mountains & Rivers Corporation
Attachments: Letter and Comments.pdf

Dear Mr. Hinkel

On behalf of Benjamin Smith who is representing Western Mountains & Rivers Corporation (“WM&RC”), please see the attached letter entering his appearance as well as the Petition for Leave to Intervene and Comments of WM&RC in the proceeding involving the Commission’s evaluation of the NECEC. Please call if you have any questions.

Thank you,
Corinna

Corinna Rodrigue
Soltan Bass Smith, LLC
P.O. Box 188
96 State Street, 2nd Floor
Augusta, Maine 04332-0188
[207-621-6300](tel:207-621-6300) (p)
[207-621-9797](tel:207-621-9797) (f)
corinna.rodrigue@soltanbass.com
www.soltanbass.com

Hinkel, Bill

From: Benjamin Smith <Benjamin.Smith@SoltanBass.com>
Sent: Thursday, August 02, 2018 3:46 PM
To: Hinkel, Bill
Cc: Corinna Rodrigue
Subject: RE: New England Clean Energy Connect - Petition for Leave to Intervene and Comments of Western Mountains & Rivers Corporation
Attachments: WMRCInterventionAttachment.pdf

Mr. Hinkel,

I apologize, but an attachment referred to in WM&RC's intervention and comments provided yesterday was inadvertently omitted from the email and letters sent by regular mail. The attachment, which is a map of mitigation lands offered by CMP, is attached.

Sorry for any confusion caused. Please let me know if you have any questions.

Best,

Ben

CAR:PPFF

Benjamin J. Smith, Esq.
Soltan Bass Smith LLC
P.O. Box 188
96 State Street, 2nd Floor
Augusta, Maine 04332-0188
[207-621-6300](tel:207-621-6300) (p)
[207-621-9797](tel:207-621-9797) (f)
[207-415-7774](tel:207-415-7774) (c)
benjamin.smith@soltanbass.com
www.soltanbass.com

From: Corinna Rodrigue
Sent: Wednesday, August 1, 2018 11:00 AM
To: bill.hinkel@maine.gov
Cc: Benjamin Smith <Benjamin.Smith@SoltanBass.com>
Subject: New England Clean Energy Connect - Petition for Leave to Intervene and Comments of Western Mountains & Rivers Corporation

Dear Mr. Hinkel

On behalf of Benjamin Smith who is representing Western Mountains & Rivers Corporation ("WM&RC"), please see the attached letter entering his appearance as well as the Petition for Leave to Intervene and Comments of WM&RC in the proceeding involving the Commission's evaluation of the NECEC. Please call if you have any questions.

Thank you,
Corinna

Corinna Rodrigue
Soltan Bass Smith, LLC
P.O. Box 188
96 State Street, 2nd Floor
Augusta, Maine 04332-0188
[207-621-6300](tel:207-621-6300) (p)
[207-621-9797](tel:207-621-9797) (f)
corinna.rodrigue@soltanbass.com
www.soltanbass.com

charles.soltan@soltanbass.com
james.bass@soltanbass.com
benjamin.smith@soltanbass.com

(207) 621-6300 (p)
(207) 621-9797 (f)
www.soltanbass.com

August 1, 2018

Via First Class Mail and Email (bill.hinkel@maine.gov)

Bill Hinkel, Permitting and Compliance Regional Supervisor
Maine Land Use Planning Commission
22 State House Station,
Augusta, Maine 04333-0022

**Re: New England Clean Energy Connect – Petition for Leave to Intervene and
Comments of Western Mountains & Rivers Corporation**

Dear Mr. Hinkel,

Please accept this letter as my entry of appearance on behalf of Western Mountains & Rivers Corporation (“WM&RC”) in the above-mentioned proceeding pending before the Land Use Planning Commission (“LUPC” or “Commission”).

This letter and the enclosed letter of Russell Walters, President of WM&RC, constitutes WM&RC’s petition for leave to intervene in this proceeding in accordance with the Commission’s Notice of Public Hearing and Opportunity to Intervene issued July 12, 2018 and Chapter 5, section 5.13 of the Commission’s Rules and Regulations.

As set forth in Mr. Walters’s letter, WM&RC is a Maine nonprofit public benefit corporation formed for the purpose of expanding conservation along Western Maine’s rivers, developing recreation projects and educational programs about the history, ecology and uses of Maine’s rivers, and expanding economic development opportunities in Western Maine, including areas impacted by the Project. Given this charitable mission, WM&RC is substantially and directly affected by the proceeding and should be granted intervention as a full party to this proceeding with all rights attendant thereto, including cross-examination of witnesses at hearing, submission of post-hearing statements and argument.

As shown by Mr. Walters’s letter, WM&RC is also in a unique position to provide input on the Project vis-à-vis the relevant statutory criteria and agency rules. These include whether the Project would fit harmoniously into the existing natural environment in order to ensure there will be no undue adverse effect on existing uses, scenic

character, and natural and historic resources in the area (12 M.R.S. § 685-B(4)(C); LUPC Regs. Ch. 10.24,C and 10.25,P(1)(a)), special exception criteria for buffering (12 M.R.S. § 685-A(10) (see also DEP Regs. Ch. 375(9)(D)), special exception criteria (no alternative site) (12 M.R.S. § 685-A(10) (see also 38 M.R.S. § 480-D(8); DEP Regs. Ch. 310(5), 310(9)(A), 335(3)), whether the design of the Project takes into account the scenic character and natural and historic features of the surrounding area (LUPC Regs. Ch. 10.25,E), and vegetation clearing (LUPC Regs. Ch. 10.27,B).

WM&RC appreciates the Commission's consideration of WM&RC's petition for leave to intervene and Mr. Walters's additional comments and welcomes the opportunity to answer any questions that the Commission may have. Please feel free to call if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Ben".

Benjamin J. Smith, Esq.

BJS/car

Enclosures

**Western Mountains & Rivers Corporation
1488 Middle Road
New Portland, ME 04961**

August 1, 2018

Via First Class Mail and Email (bill.hinkel@maine.gov)

Maine Land Use Planning Commission
22 State House Station
Augusta, Maine 04333-0022

**Re: New England Clean Energy Connect – Petition for Leave to Intervene and
Comments of Western Mountains & Rivers Corporation**

Dear Mr. Hinkel,

My name is Russell Walters, and I am President of Western Mountains & Rivers Corporation (“WM&RC”). WM&RC seeks leave to intervene in the above-referenced proceeding which involves review by the Land Use Planning Commission (“LUPC” or “Commission”) of an application of Central Maine Power Company (“CMP”) for components of the New England Clean Energy Connect (“NECEC” or “Project”).

WM&RC has a direct and substantial interest that will be impacted by the Project and should be granted intervention. Given its charitable mission which is described below, WM&RC is in a position to provide input on whether the Project will fit harmoniously into the existing natural environment in order to ensure there will be no undue adverse effect on existing uses of the Kennebec River and surrounding natural and historic resources, and its scenic character.

WM&RC’s Board members have considered and evaluated the various Kennebec River crossing alternatives under consideration and their impact on the Kennebec River and its users. In order to help mitigate the Project’s impacts on the environmental and scenic character of the area affected by the Project, and in order to enhance long-term economic development, recreational, and eco-tourism benefits to the Western Maine region, WM&RC has negotiated a Memorandum of Understanding (“MOU”) with CMP.

This petition to intervene describes that MOU and outlines WM&RC’s specific contentions regarding the existing use of the segment of the Kennebec River that the Project proposes to cross, the scenic character of the Kennebec River, unreasonable impacts of the alternatives, and natural resources in the municipality or in neighboring municipalities of the Kennebec River crossing.

Mission of WM&RC

WM&RC is a Maine nonprofit public benefit corporation formed for the purpose of expanding conservation of the Kennebec, Dead, Sandy, Moose, Sebasticook and Carrabassett

rivers; developing recreation projects; developing education programs about the history, ecology and uses of Maine's rivers; and expanding economic development opportunities along the rivers of Western Maine. WM&RC's Board of Directors is comprised of town selectpersons, former county commissioners, former legislators as well as private business persons in the rafting and eco-tourism industry who have first-hand knowledge of the aesthetic and environmental importance of the Kennebec Gorge region and surrounding areas.

Summary of Terms of the MOU and Mitigation Proposed

Under the MOU, CMP has agreed to provide initial and annual monetary contributions to help establish WM&RC as a charitable organization. Upon approval of the Project and fulfillment of other preconditions, CMP has also agreed to make additional donations totaling as much as \$22 million to help WM&RC fund the development of recreational infrastructure and projects and educational programs within its charitable purpose. These donated funds will be administered through a trust which will help ensure that they are used only in keeping with WM&RC's charitable objectives. Substantial by any standard, these donations will be used for direct expenditures but will also allow WM&RC to leverage additional grants and matching funds to help achieve long-lasting – if not perpetual – economic development impacts to the Western Maine region.

CMP has agreed to provide WM&RC with access to lands to help fulfill its charitable objectives. These include the potential sale of (or options to sell) land owned by CMP to businesses in Central and Northern Somerset County that is not essential to CMP's current or anticipated future needs. These lands will help support economic development in these areas and allow for the planned expansion of recreational trails, huts, and other projects that will enhance eco-tourism in the greater Western Maine region. The specific lands are summarized as follows and depicted by the map set forth as Attachment A:

- Old Rail Bed from Indian Pond to Route 15 in Rockwood,
- River Frontage below The Forks,
- Approximately 670 acres on the Dead River below Grand Falls to be made available to WM&RC (or to one or more other charitable and/or environmental organizations designated by WM&RC),
- Flagstaff Hut area (current lease by WM&RC to be released),
- Hut Sites leased at Grand Falls, Hut Sites at Chase Stream and Indian Pond and trails under license agreement to Maine Huts & Trails,
- Moxie Falls trail easements acquired and assured for motorized and non-motorized trail from town to the falls,
- Availability for single track bike trails off the existing and proposed bike trail system,
- North End of Indian Pond, and
- Below the dam on the Kennebec River.

In addition to land access, CMP has also agreed to provide, at no cost to WM&RC, access to and use of gravel pits owned by CMP for WM&RC's development and maintenance of its trail systems and other recreational assets. This access to gravel provides substantial additional value that goes above and beyond the monetary donations afforded under the MOU and will greatly reduce the costs of building and maintaining the recreational trails and related infrastructure projects.

CMP has also agreed, subject to and as permitted by applicable laws, regulations, ordinances, and permits, to facilitate access of the Project corridor for ATV, snowmobile, and other recreational uses.

CMP has also agreed, to the extent permitted by FERC and Brookfield (where applicable), to provide public and commercial access to Harris Station, Indian Pond, and Carrybrook for whitewater rafting, boating, and fishing, and for snowmobile, ATV, bicycle, and other motorized and non-motorized trail uses. Such access will be through CMP's existing easement rights or through CMP's purchase of the Indian Pond Road from Moxie Lands LLC, and the negotiation of a no fee easement for commercial recreational access on Lower Enchanted Road to access the Dead River. In recent years, public and commercial access to these areas has been disrupted and constrained due to changes in private ownership of roads providing access to the Kennebec River, Indian Pond, and the Dead River. Rafting outfitters currently pay \$3.00 per person to access the Kennebec River and have been threatened with substantial increases in the near future. Access to the Dead River is currently only permitted if users and outfitters pay a premium of \$13.50 per person. Renewed access to these areas through potential no fee easement agreements with CMP will improve recreational access to these vital natural resources and spur economic development opportunities for the region.

CMP has also agreed, at its sole expense, to include an optical ground cable with multiple strands of fiber that will enable expanded broadband, wide area Wi-Fi, and other enhanced communication services for the residents and businesses of Androscoggin, Somerset, and Franklin counties through the ability to loop fiber on the Route 27 and 201 corridors. An enhanced fiber network and improved broadband capabilities is essential to the economic growth of Western Maine, and the investment necessary to fund this infrastructure has historically been cost prohibitive to communities, business owners, and other private persons. The commitment by CMP to expand fiber and broadband to the Western Maine region is an important component of the mitigation package, will help WM&RC realize its charitable mission, and will also more broadly help the development of eco-tourism in Western Maine.

WM&RC's Position on Crossing Alternatives

WM&RC has taken great time to consider the various impacts of the crossing alternatives under consideration.

The MOU is intended to offer mitigation that will help offset the environmental, scenic/aesthetic, and other impacts of the various crossing alternatives. Although the MOU allows for some mitigation measures in the event that the NECEC crosses either beneath the

Kennebec River or at Harris Station, WM&RC would observe that the relatively minimal intrusion of an overhead crossing coupled with the engineering, environmental, legal, and logistical complexities presented by these other alternatives militate in favor of an overhead crossing of the Kennebec River.

The predominant existing use of the segment of the Kennebec River that is in the vicinity of the proposed NECEC crossing is rafting. The scenic character of the Kennebec River in this area is defined primarily by the water and the shoreline. Based on the engineering design and buffering proposed by CMP, the visual impact of overhead transmission lines would be quite limited and would likely have no adverse impact on the rafting industry or other river users. Even where the overhead crossing is proposed, the water moves at approximately six miles per hour. In order to have a successful and safe trip, rafters must remain focused on the water, the paddling and other techniques to be employed in downstream water, and following guides' commands.

No one rafts the Kennebec River without first putting in at Harris Dam, where there is a powerhouse, an enormous concrete dam and spillway, and prominent overhead power lines. Despite these large man-made structures, persons are undeterred from enjoying the rafting experience. After experiencing the awesome power and rugged beauty of the Kennebec River over the 12-mile segment and the exhilaration of class III and IV water, rafters will likely have no negative reaction from passing beneath two conductors and two shield wires located two hundred feet or more above the river.

The overhead crossing has been designed to avoid natural resource impacts by limiting the number of structures required to support this crossing and placing them out of view of rafters or other users of the river. The extent of tree clearing required for an overhead solution should also have a minimal impact on the scenic character of the river. The woods in the area adjacent to the NECEC crossing are working forests and the clearing necessary for the corridor is compatible with these existing surrounding uses. Further, the overhead crossing has been designed to preserve significant (hundreds of feet of) mature forested buffers along the east and west side of the river where the NECEC would cross, making the support structures of the transmission line invisible from the rafters' perspective.

Conversely, a crossing of the NECEC beneath the Kennebec River would require additional infrastructure and result in permanent disruption of the surrounding natural environment. Significant directional boring and blasting would be necessary. An underground crossing could temporarily impact water quality because of the extent of dredged material removed during the directional drill, or if drilling mud were to make its way into the river itself. The underground conductors would be encased in large, permanent concrete duct banks in order to allow for redundant facilities to ensure reliable operation. Permanent buildings and access roads would be necessary to allow for the operation of the cooling systems necessary for the lines as well as ongoing maintenance of other utility infrastructure. In order to prevent unauthorized access or traffic, the termination points of the underground crossings and the buildings and other facilities would also have to be barricaded with fences and gates. It is our opinion that this level of infrastructure would have greater negative impact to the environment in the vicinity of the Kennebec River when compared to an overhead alternative.

Although it initially appeared to WM&RC that a crossing of the NECEC at Harris Station may be technically feasible and have the least environmental and visual impact on users of the Kennebec River, such a solution is not viable. Colocation of the NECEC near Harris Station raises logistical and legal issues that could prove devastating to rafting outfitters who rely on the Kennebec River for their businesses. Many local governments, private businesses, and environmental groups were parties to the proceeding that led to the last FERC relicensing of Harris Station. A crossing of the NECEC at Harris Station would require a new FERC proceeding, which would be lengthy and time consuming. WM&RC, as a non-profit corporation, would be at a disadvantage in such expensive litigation. Further, because Brookfield's commitments to river users would be the subject of an amended license, and the negotiation of amended license terms, rafting outfitters and other river users could lose ground when compared to the status quo. Following a license amendment, Brookfield may have less of an obligation to provide access to the river and/or fewer commitments to manage and coordinate the flow of the river in a manner that allows for rafting expeditions. The danger of such a potential outcome weighs greatly in favor of an overhead alternative.

Conclusion

In closing, WM&RC's consideration of the environmental, scenic, and other impacts of the alternative crossings by the NECEC have been thoroughly evaluated and considered by WM&RC's Board after discussions with various stakeholders in the Western Maine region. If WM&RC was concerned that an overhead crossing would adversely impact the experiences of rafters or other users of the Kennebec River, it would oppose such an alternative. However, given the engineering design of the overhead crossing, the use of buffering, and the placement of structures outside of the viewshed of users of the river, WM&RC is confident that the experience of rafters will not be diminished. Furthermore, the monetary donations, land concessions, expanded fiber optic / broadband buildout in Western Maine, and other commitments of CMP as part of the mitigation package under the MOU, which were the result of extensive negotiations with CMP, will help protect the scenic, environmental, and cultural characteristics of the Kennebec, Sandy, Moose, Sebec, Carrabassett, and Dead rivers.

The Western Maine region has become increasingly reliant on tourism. Only one of three stores that operated historically remains open in West Forks. The number of rafting companies has declined. Where once there were 17 rafting companies in and around The Forks, there are now approximately a dozen. When such an industry declines, families move out of the area. When families leave, schools close. When schools close, children have to be bused to remote schools (for instance, children from The Forks are now bused to Moscow or Bingham), education suffers, and communities unravel. With fewer people, the burden of property taxes falls upon an even smaller population, only compounding the financial impact on an already struggling economy.

The mitigation offered for an overhead solution would help change all of this. The MOU provides seed money to leverage and invest in the development of recreational infrastructure and nature-based tourism, including trails, a visitor center, educational programs, and more. CMP has offered to sell leases on reasonable terms, and to transfer non-critical land and gravel assets

to help grow businesses in the area. Located north of Bingham and south of Jackman and with Greenville/Moosehead Lake to the east and Carrabassett Valley/Sugarloaf to the west, The Forks/West Forks area can be reinvigorated as the hub of a future area of economic growth based on nature-based recreation and eco-tourism. Those seeking outdoor experiences of all kinds will come, stay, and return, and Western Maine can begin to thrive as a region. In short, the mitigation package afforded for an overhead solution will help spur economic development in Western Maine through the balanced use and stewardship of the region's natural resources.

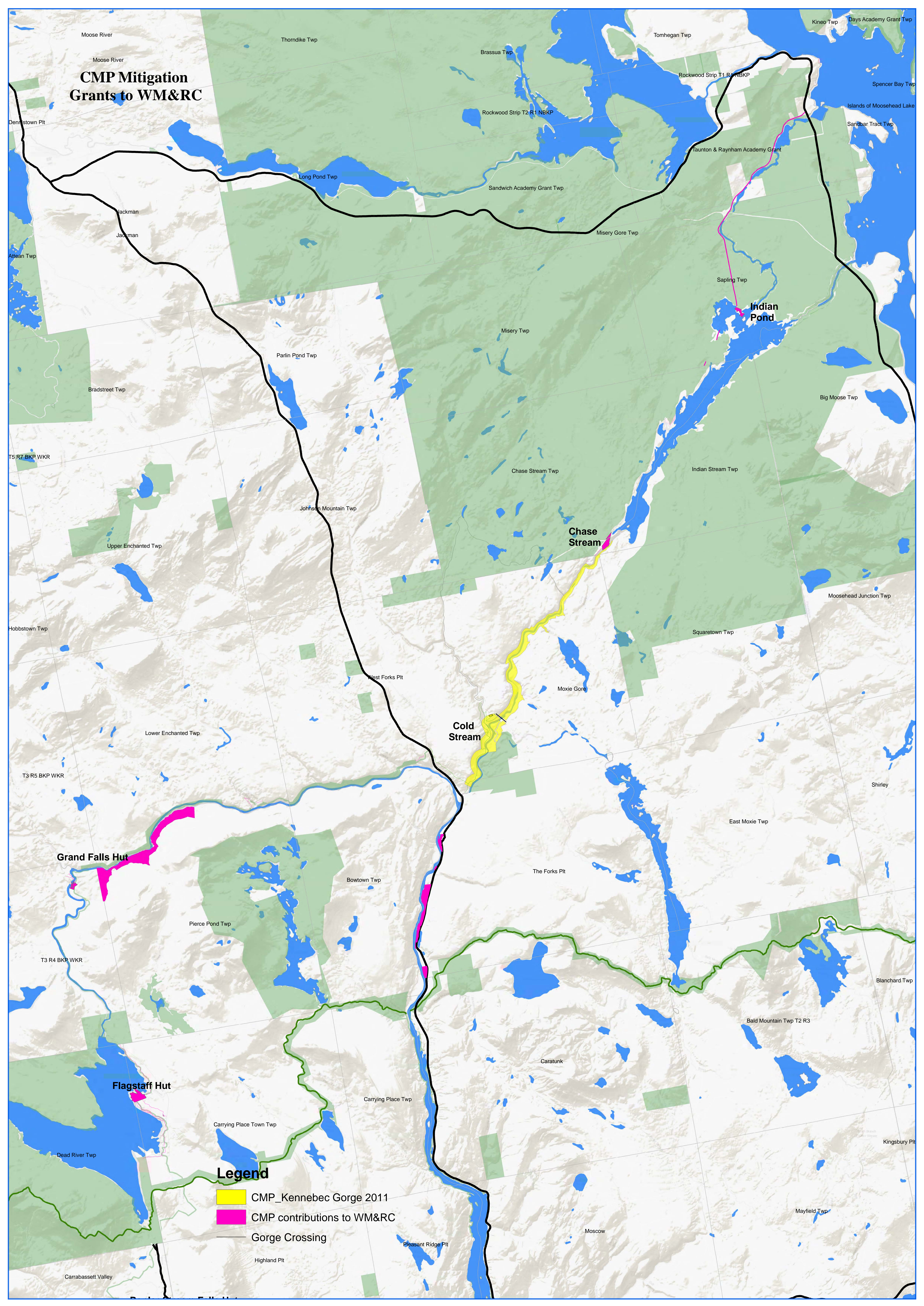
WM&RC appreciates the Commission's consideration of these comments and this petition to intervene, and welcomes the opportunity to answer any questions that the Commission may have.

Sincerely,



Russell Walters
President
Western Mountains & Rivers Corporation

CMP Mitigation Grants to WM&RC



- Legend**
- CMP_Kennebec Gorge 2011
 - CMP contributions to WM&RC
 - Gorge Crossing

Hinkel, Bill

From: Kenneth Boyington <kenb@crowleyenergy.com>
Sent: Thursday, August 02, 2018 11:56 AM
To: Hinkel, Bill
Subject: NECEC

Mr. Hinkel,

I would like to petition the LUPC against the approval of the proposed "CMP power corridor." Allowing a company, which is a subsidiary of a European company by the way, to rip a swath through our state in an area as sensitive as this is concerning. We will likely see very little if any benefits from it. Avangrid/CMP will make an estimated \$60 million/year on the project. Another thing to consider is the questionable competence of a company that knew it had issues with it's billing system and refused to admit it until an investigation was launched. I believe a similar investigation was launched against them when they first installed smart meters as well. According to a class action lawsuit filed late last year, Avangrid artificially inflated the price of electricity to consumers from 2013-2016 to the tune of 3.6 billion in New England. Avangrid/CMP is not interested in the wellbeing of Maine, our people, or our natural resources they are interested in their balance sheet. Furthermore, as a sportsman, it's very concerning to me that this clear cut will be crossing near and over some of the last true wild brook trout habitats in the country. I believe we have to duty to protect our natural resources and this project has the potential to inflict serious damage on the surrounding area. We are counting on the LUPC board to make the right decision in turning down this project to preserve the natural beauty of this area and to continue with Maine's legacy of pristine wilderness.

Ken Boyington
Operations Manager
Crowley Energy
Mobile: 207-607-2999
Office: 207-721-1192
www.crowleyenergy.com

ps. I'm not sure if you are familiar with the area that this project is taking place. I'll attach a few photos but if you haven't been please come check it out. It's absolutely gorgeous and I'd be more than happy to show you around.







Hinkel, Bill

From: Carrie Carpenter <carrie_carpenter@rocketmail.com>
Sent: Thursday, August 02, 2018 2:01 PM
To: Hinkel, Bill
Subject: Petition to Intervene in New England Clean Energy Connect Project - SLC-9

Dear Land Use Planning Commission,

My name is Carrie Carpenter and I have been a resident of Somerset County my entire life. My family has a long history with the lands and waters of this beautiful area. From my great- grandparents who ran sporting camps on Austin Pond and later on Wyman Lake, to my great- great-great grandfather, a hunting and fishing guide in The Forks who made birch bark canoes and caribou hide snowshoes. Great love, respect, and appreciation for this land and its resources have been passed down through generations. I rest assured that your committee was created out of those same values.

I ask you today to please help stop the New England Clean Energy Connect Project. Please do not allow a short-sighted decision based purely on money to jeopardize resources that once depleted we may never get back. Please fight to ensure future generations will be able to enjoy and work this land as you and I and many generations before us have.

The LUPC guiding principles are listed on your website. (They are copied and pasted below.) I hope with all of my heart that you truly honor these principles, as every single one is a reason to intervene and stop the NECEC Project...

- Preserve public health, safety and general welfare;
- Support and encourage Maine's natural resource-based economy and strong environmental protections;
- Encourage appropriate residential, recreational, commercial and industrial land uses;
- Honor the rights and participation of residents and property owners in the unorganized and deorganized areas while recognizing the unique value of these lands and waters to the State;
- Prevent residential, recreational, commercial and industrial uses detrimental to the long-term health, use and value of these areas and to Maine's natural resource-based economy;
- Discourage the intermixing of incompatible industrial, commercial, residential and recreational activities;
- Prevent the development in these areas of substandard structures or structures located unduly proximate to waters or roads;
- Prevent the despoliation, pollution and detrimental uses of the water in these areas; and
- Conserve ecological and natural values.

Please find this written letter, emailed and postal mailed, as a petition to intervene in Central Maine Power's (CMP's) application for a Site Location of Development Act permit and a Natural Resources Protection Act permit for the New England Clean Energy Connect (NECEC) high voltage direct current (HVDC) transmission line running from the Québec-Maine Border to Lewiston and related network upgrades.

Date: August 2, 2018

Respectfully submitted,

Carrie Carpenter

[336 Beech Hill Rd Norridgewock, ME 04957](http://336BeechHillRdNorridgewockME04957)

207-680-5858

carrie_carpenter@rocketmail.com

Hinkel, Bill

From: Dennis Crosen <dencro48@aol.com>
Sent: Thursday, August 02, 2018 10:33 AM
To: Hinkel, Bill
Subject: Power cord

This is a terrible proposal. Destroy virgin land to supply power to another state. This is not good for the people of the state and the state itself. Amazing this would even be considered. You should all be ashamed!!!

Dennis Crosen
Vassalboro, Maine

Sent from my iPhone

Hinkel, Bill

From: ausilia_evans@yahoo.com
Sent: Thursday, August 02, 2018 5:53 PM
To: Hinkel, Bill
Subject: Petition to stop CMP powerlines

Dear Mr. Hinkel,

Please accept this letter as a petition against the approval of the CMP Powerline Corridor from Auburn to Beattie TWP on the Canadian border. Our family owns a camp in Upper Enchanted Township and we have been coming to that area since the early 1990's. This mountainous region, as well as the Kennebec Gorge, is a place that resides in the person, not the other way around. There should not be any argument that it is the final frontier on the east coast of the United States and should be preserved and not allow a permanent clear cut. This clear cut would require yearly brush suppression maintenance, likely involving heavy equipment, chemicals, hydraulic fluid spills, and other destructive practices and mishaps. Making a clear cut through the heart of the Moose River Valley, the Kennebec Gorge, and over the other pristine mountains, ponds and streams should be enough to decline the project. I argue that it should have been enough to never let this project pass the first hurdle. Such a high voltage line could negatively affect the native brook trout and it is not worth taking a chance on it. Deer are sparse enough in our area since the destruction of winter deer beds decades ago, and this will further stunt that necessary expansion of deer beds more permanently.

If tourism is important to the State of Maine, know that visitors to that area do not come there to see this type of development. If wind turbines were the test case, then the theory has been settled. The vast majority of people I talk to find them to detract from the natural wilderness beauty and this powerline will be no exception.

For Massachusetts to just decide to become more green by making a neighboring state (and Canada) more brown and put them at environmental risk is morally detestable. The bribes to local organizations and even giving \$50 Million to low income Massachusetts utility customers sounds like industrial espionage. Why they are not able to sustain their own power needs is not Maine's problem and it can be sustained within their own borders if they just find the will. They turned down wind on the ocean and have decommissioned power plants. That was a choice that they made. Just because they don't want it in their back yard, doesn't mean we should be forced to have it in our front yard. This is an initiative in windfall profits for CMP, and Canada. The jobs are short term and not sustained. There is no benefit to Maine, only to a corporation based in Spain. Countless environmental groups and even the Dept. of Inland Fisheries and Wildlife are opposed to this initiative. I ask that you to consider their educated and expert conclusions with respect to wildlife and environmental impact. Our Road Association Board, which serves over 50 landowners very close to this proposed corridor, voted to take a position of opposing this project.

If CMP/ AVANGRID Inc., are given the green light on this project, it will be like opening Pandora's box on our wilderness. The promises, assurances, and wildlife studies done by the petitioner will be water under the bridge. When this goes sideways, it will be too late. If we are sorry later, the stockholders and executives in big, shiny buildings that have never set foot here will profit for eternity. We are counting on you and the LUPC board to preserve this beautiful area.

Sincerely,
Maria-Ausilia Evans
No Power Cord Through ME (FB Group)"

Hinkel, Bill

From: Andrea Goodenow <goodenow4@comcast.net>
Sent: Thursday, August 02, 2018 4:12 PM
To: Hinkel, Bill
Subject: CMP Line

We ARE NOT in favor of the CMP line coming from Canada through Somerset County. We DO NOT see any benefit to Maine. This is all for Massachusetts!! Maine will pay the price loosing our beautiful landscape!!!!

Clint and Andrea Goodenow

Sent from my iPhone

Hinkel, Bill

From: Stacy Brann <stacy@ibew104.org>
Sent: Thursday, August 02, 2018 3:09 PM
To: Hinkel, Bill
Subject: Petition to Intervene - NECEC Project
Attachments: State of Maine Land Use Planning Commission.pdf

Good Afternoon Bill Hinkel,
I am sending the attached document for Tim Burgess.
Please let Tim know if you have any questions about the contents of the report.
Please confirm receipt of this email.

Thank You

Stacy L Brann
[IBEW 104](#)
stacy@ibew104.org
207-241-7691

**STATE OF MAINE
LAND USE PLANNING COMMISSION**

IN THE MATTER OF

Central Maine Power Co.)	
New England Clean Energy Connect)	Petition to Intervene of
#L-27625-26-A-N, #L-27625-TG-B-N,)	the International Brotherhood
#L-27625-2C-C-N, #L-27625-VP-D-N,)	of Electrical Workers in
and #L-27625-IW-E-N)	Support of NECEC

Now comes the International Brotherhood of Electrical Workers (IBEW) and petitions to intervene as a party in the matter of the NECEC Project applications for Site Location of Development Act and Natural Resources Protection Act permits. *See* LUPC Regs. Ch. 5 § 5.13(1). Pursuant to the applicable regulations governing the LUPC’s public hearings, “[a] petition to intervene shall be granted if it demonstrates that the petitioner is or may be substantially and directly affected by the proceeding.” LUPC Regs. Ch. 5 § 5.13(1). The IBEW meets this criterion, as discussed below. The Presiding Officer therefore should grant this petition.

I. IBEW is substantially and directly affected by this proceeding.

The IBEW has a substantial and direct interest that will be affected by this proceeding. The IBEW is a labor organization representing more than 1,800 employees in Maine. Many of these employees also reside within the state. The IBEW has substantial interest in the proposed Project because of its expertise and experience in constructing energy infrastructure. Additionally, the proposed Project will deliver clean energy into the New England energy grid. Future employment of individuals IBEW represents depends on the development of clean energy. Moreover, the development of energy facilities that employ Maine citizens will benefit local businesses, Maine workers, and their families. The NECEC Project is estimated to provide

upwards of \$436 million in compensation to construction workers over the five-year construction period. Furthermore, the IBEW has a substantial interest in these proceedings because its members will be called upon to undertake much of the work necessary to complete the proposed Project.

Because of the substantial interest that the IBEW has in the proposed Project, the IBEW does not believe that any other party to this proceeding can adequately represent its interests.

II. IBEW has specific contentions regarding statutory and LUPC's regulatory criteria.

IBEW is seeking to intervene in these proceedings to raise specific contentions regarding the statutory and regulatory criteria that will apply to the Project. IBEW's contentions include, but are not limited to, the following:

- No reasonable alternative exists (*see* 12 M.R.S. § 685-A(10); LUPC Regs. § 10.23,I(3)(d)(8))
- Adequate buffering (*see* 12 M.R.S. § 685-A(10); LUPC Regs. § 10.23,I(3)(d)(8))
- Conformance with LUPC's development standards (*see* 38 M.R.S. § 489-A-1(1)(D); LUPC Regs. Ch. 10.25))
- Conduct of activities in flood prone areas (*see* 38 M.R.S. § 489-A-1(1)(D); LUPC Regs. Ch. 10.25,T)
- Conformance with LUPC's dimensional requirements (*see* 38 M.R.S. § 489-A-1(1)(D); LUPC Regs. Ch. 10.26,A-G)
- Conformance with LUPC's regulations governing vegetation clearing (*see* 38 M.R.S. § 489-A-1(1)(D); LUPC Regs. Ch. 10.27,B)
- Conformance with LUPC's regulations governing signs (*see* 38 M.R.S. § 489-A-1(1)(D); LUPC Regs. Ch. 10.27,J)

Our witnesses are prepared to file written reports and/or present testimony with an opportunity for questions and cross-examination, and will ensure that the IBEW presents detailed, technical information about the proposed Project. We will attend pre-hearing conferences and the public hearing. Therefore, the IBEW is both prepared and capable of participating in this proceeding and supporting its contentions discussed above.

IV. Conclusion

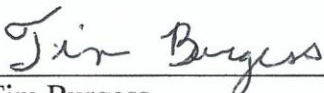
Based on the foregoing, the IBEW seeks to intervene to raise specific contentions about the facts presented in CMP's application and compliance with the applicable statutory and regulatory criteria. The IBEW has satisfied the requirements for intervention under the applicable regulations and respectfully seeks to intervene in this proceeding as a party.

Respectfully submitted,

INTERNATIONAL
BROTHERHOOD OF
ELECTRICAL WORKERS

By Its Representative,

Date: August 2, 2018



Tim Burgess
Business Representative
International Brotherhood of
Electrical Workers, Local 104
238 Goddard Road
Lewiston, Maine 04240
(207) 241-7691

Hinkel, Bill

From: Kaleb Jacob <kjacob@eaglenetsolutions.com>
Sent: Thursday, August 02, 2018 11:00 AM
To: Hinkel, Bill
Subject: Petition against CMP's NECEC

1 AUG 2018

Dear Mr. Hinkel,

Please accept this letter as a petition against the approval of the CMP Powerline Corridor from Auburn to Beattie TWP on the Canadian border. Our family owns a camp in Upper Enchanted Township and we have been coming to that area since the early 1990's. This mountainous region, as well as the Kennebec Gorge, is a place that resides in the person, not the other way around. There should not be any argument that it is the final frontier on the east coast of the United States and should be preserved and not allow a permanent clear cut. This clear cut would require yearly brush suppression maintenance, likely involving heavy equipment, chemicals, hydraulic fluid spills, and other destructive practices and mishaps. Making a clear cut through the heart of the Moose River Valley, the Kennebec Gorge, and over the other pristine mountains, ponds and streams should be enough to decline the project. I argue that it should have been enough to never let this project pass the first hurdle. Such a high voltage line could negatively affect the native brook trout and it is not worth taking a chance on it. Deer are sparse enough in our area since the destruction of winter deer beds decades ago, and this will further stunt that necessary expansion of deer beds more permanently.

If tourism is important to the State of Maine, know that visitors to that area do not come there to see this type of development. If wind turbines were the test case, then the theory has been settled. The vast majority of people I talk to find them to detract from the natural wilderness beauty and this powerline will be no exception.

For Massachusetts to just decide to become more green by making a neighboring state (and Canada) more brown and put them at environmental risk is morally detestable. The bribes to local organizations and even giving \$50 Million to low income Massachusetts utility customers sounds like industrial espionage. Why they are not able to sustain their own power needs is not Maine's problem and it can be sustained within their own borders if they just find the will. They turned down wind on the ocean and have decommissioned power plants. That was a choice that they made. Just because they don't want it in their back yard, doesn't mean we should be forced to have it in our front yard. This is an initiative in windfall profits for CMP, and Canada. The jobs are short term and not sustained. There is no benefit to Maine, only to a corporation based in Spain.

Countless environmental groups and even the Dept. of Inland Fisheries and Wildlife are opposed to this initiative. I ask that you to consider their educated and expert conclusions with respect to wildlife and environmental impact. Our Road Association Board, which serves over 50 landowners very close to this proposed corridor, voted to take a position of opposing this project.

If CMP/ AVANGRID Inc., are given the green light on this project, it will be like opening Pandora's box on our wilderness. The promises, assurances, and wildlife studies done by the petitioner will be water under the bridge. When this goes sideways, it will be too late. If we are sorry later, the stockholders and executives in big, shiny buildings that have never set foot here will profit for eternity.

We are counting on you and the LUPC board to preserve this beautiful area.

Sincerely,

Kaleb Jacob
Registered Maine Guide

President, Upper Enchanted Owner's Road Assoc.

No Power Cord Through ME (FB Group)

(207) 613-1144 xt. 10

Hinkel, Bill

From: Melissa Keister <mdkeister@gmail.com>
Sent: Thursday, August 02, 2018 5:14 AM
To: Hinkel, Bill
Subject: Please....NO CMP CORRIDOR

As a lifelong Mainer and lover of our woods, rivers, mountains, and wildlife, I'm asking that we preserve these beauties. We are gradually losing "The way life should be". When people make the trip north to boat, fish, hunt, camp, leafpeep, the last thing we want to see is swaths of forest removed and power lines tearing through the land and across our rivers. Please preserve Maine. NO CMP CORRIDOR! PLEASE!

Hinkel, Bill

From: info@kennebecriverangler.com
Sent: Thursday, August 02, 2018 4:35 PM
To: Hinkel, Bill
Subject: Petition to Intervene CMP/NECEC

On behalf of Kennebec River Angler, KRA, I would like to file to intervene regarding CMP's proposed power line project, NECEC. Specifically we feel more environmental studies should be done in regards to how the project affects native brook trout habitat within the watershed. We would also like to see data regarding the economic impact of having a visible power corridor within the Upper Kennebec River gorge will have on local businesses, namely the rafting and fishing businesses that operate in the gorge.

Repectfully submitted,
Chris Russell
Kennebec River Angler
PO Box 59
Caratunk, ME 04925
207-672-3408

Hinkel, Bill

From: Todd Towle <kingfisherriverguides@tds.net>
Sent: Thursday, August 02, 2018 1:49 PM
To: Hinkel, Bill
Subject: Letter To Petition CMP Proposal.

Dear Mr. Hinkel,

Please accept this letter as a petition against the CMP Corridor project.

This is a horrible project that will destroy one of the "last best places in Maine"..

It will harm water and habitat quality for native Brook trout. Which will in turn harm the local economy and my business.

It will destroy available deer wintering areas. These have already seen enough damage in recent years. Again harming the local economy and recreational community.

It will be very intrusive to the landscape, especially in the Boundary Mountains. This is a very special place where this project would alter forever.

The economics of the project do nothing for the citizens of the state of Maine as a whole.

Maine has very few whitewater experiences on such a grand scale. We only have one Kennebec Gorge. This project devalues it immensely .

This project will devastate a very special and unique area of Maine. There will be no recovery after the lines are up. Please for the future of Maine's future kill this mistake.

Thank You,

Todd Towle

Kingfisher River Guides
P.O.Box 442
Kingfield, Me. 04947
207 265 5823
<http://www.kingfisherriverguides.com/>
<http://kingfisherriverguides.blogspot.com/>
<https://www.facebook.com/KingfisherRiverGuides/>

Hinkel, Bill

From: sheri kreider <slkcamcat@outlook.com>
Sent: Thursday, August 02, 2018 5:01 PM
To: Hinkel, Bill
Subject: no transmission line

Dear Mr. Hinkel, (Bill.Hinkel@maine.gov)

I completely agree with the originator of this letter. There is no need of this in the wilderness. My husband and I moved here to raise a family having the unspoiled outdoors nearby. It will negatively impact all of the tourism in the area as well.

Please accept this letter as a petition against the approval of the CMP Powerline Corridor from Auburn to Beattie TWP on the Canadian border. Our family owns a camp in Upper Enchanted Township and we have been coming to that area since the early 1990's. This mountainous region, as well as the Kennebec Gorge, is a place that resides in the person, not the other way around. There should not be any argument that it is the final frontier on the east coast of the United States and should be preserved and not allow a permanent clear cut. This clear cut would require yearly brush suppression maintenance, likely involving heavy equipment, chemicals, hydraulic fluid spills, and other destructive practices and mishaps. Making a clear cut through the heart of the Moose River Valley, the Kennebec Gorge, and over the other pristine mountains, ponds and streams should be enough to decline the project. I argue that it should have been enough to never let this project pass the first hurdle. Such a high voltage line could negatively affect the native brook trout and it is not worth taking a chance on it. Deer are sparse enough in our area since the destruction of winter deer beds decades ago, and this will further stunt that necessary expansion of deer beds more permanently. If tourism is important to the State of Maine, know that visitors to that area do not come there to see this type of development. If wind turbines were the test case, then the theory has been settled. The vast majority of people I talk to find them to detract from the natural wilderness beauty and this powerline will be no exception.

For Massachusetts to just decide to become more green by making a neighboring state (and Canada) more brown and put them at environmental risk is morally detestable. The bribes to local organizations and even giving \$50 Million to low income Massachusetts utility customers sounds like industrial espionage. Why they are not able to sustain their own power needs is not Maine's problem and it can be sustained within their own borders if they just find the will. They turned down wind on the ocean and have decommissioned power plants. That was a choice that they made. Just because they don't want it in their back yard, doesn't mean we should be forced to have it in our front yard. This is an initiative in windfall profits for CMP, and Canada. The jobs are short term and not sustained. There is no benefit to Maine, only to a corporation based in Spain. Countless environmental groups and even the Dept. of Inland Fisheries and Wildlife are opposed to this initiative. I ask that you to consider their educated and expert conclusions with respect to wildlife and environmental impact. Our Road Association Board, which serves over 50 landowners very close to this proposed corridor, voted to take a position of opposing this project.

If CMP/ AVANGRID Inc., are given the green light on this project, it will be like opening Pandora's box on our wilderness. The promises, assurances, and wildlife studies done by the petitioner will be water under the bridge. When this goes sideways, it will be too late. If we are sorry later, the stockholders and executives in big, shiny buildings that have never set foot here will profit for eternity.

We are counting on you and the LUPC board to preserve this beautiful area.

Sincerely,

Thanks you for your time

Sheri Kreider,



Virus-free. www.avast.com

Hinkel, Bill

From: Rebecca Swanson Conrad <Beckie@lametrochamber.com>
Sent: Thursday, August 02, 2018 11:04 AM
To: Hinkel, Bill
Subject: LUPC Petition to Intervene
Attachments: Scanned from a Xerox Multifunction Printer.pdf

Dear Bill,

Please find attached a signed and notarized petition to intervene from the Lewiston Auburn Metropolitan Chamber of Commerce regarding Central Maine Power's New England Clean Energy Connect application to the Land Use Planning Commission.

Please let me know if you have any questions.

Thank you,

Beckie Conrad

Rebecca Swanson Conrad
President/CEO
LA Metro Chamber of Commerce
415 Lisbon Street
Lewiston, ME 04240
207-783-2249
Beckie@lametrochamber.com

www.LAMetroChamber.com

www.DiscoverLAMaine.com

Become a [member](#) today!

Follow us on [Facebook](#), [Instagram](#), [LinkedIn](#) and [Twitter](#)!

**STATE OF MAINE
LAND USE PLANNING COMMISSION**

Central Maine Power Co.)	
New England Clean Energy Connect)	Petition to Intervene of
#L-27625-26-A-N, #L-27625-TG-B-N,)	Lewiston Auburn Metropolitan
#L-27625-2C-C-N, #L-27625-VP-D-N,)	Chamber of Commerce In Support
and #L-27625-IW-E-N)	of New England Clean Energy
)	Connect

Now comes the Lewiston Auburn Metropolitan Chamber of Commerce (LA Metro Chamber), in support of Central Maine Power’s (CMP) New England Clean Energy Connect (NECEC) Project, and respectfully petitions to intervene as a party in the above-captioned matter of the NECEC Project applications for Site Location of Development Act and Natural Resources Protection Act permits. *See* LUPC Regs. Ch. 5 § 5.13(1). Pursuant to the applicable regulations governing the conduct of public hearings, “[a] petition to intervene shall be granted if it demonstrates that the petitioner is or may be substantially and directly affected by the proceeding.” LUPC Regs. Ch. 5 § 5.13(1). The LA Metro Chamber meets this criterion, as discussed below, and the Presiding Officer therefore should grant this petition.

I. The LA Metro Chamber, and its membership, will be substantially and directly affected by the proceeding.

As a community-minded business organization, the LA Metro Chamber is an engine for economic vitality and enhanced quality of life in our region. We are a not-for-profit organization supported through membership dues and contributions. Our purpose is to make Lewiston-Auburn a welcoming place to do business and an ideal place to live. The economic benefits of the NECEC Project will significantly advance our local mission. The increased property tax revenue for the City of Lewiston will make the area more prosperous and capable of providing

services, infrastructure, and enhancements that will help us attract and retain families and businesses. The NECEC will directly contribute to a more vital community in the Lewiston-Auburn area, which is precisely what the LA Metro Chamber is working to accomplish.

CMP has a very positive history in Lewiston-Auburn, recently confirmed by the current Lewiston Loop project and the Maine Power Reliability Project. We have also seen investments in smart grid meters and improved customer service. AVANGRID, CMP's parent company, has billions of dollars in assets and operations in more than one half of U.S. states. Its primary shareholder, Iberdrola, is one of the largest and strongest utilities in the world. CMP has an outstanding record of permitting and building projects in a way that employs Maine people and contributes to a stronger grid, which is an important factor in attracting new businesses.

II. The Maine State Chamber has specific contentions regarding statutory and LUPC's regulatory criteria.

The Maine State Chamber is seeking to intervene in these proceedings to raise specific contentions regarding the statutory and regulatory criteria that will apply to the project. Our contentions include, but are not limited to, the following:

- No alternative site -- 12 M.R.S. § 685-A(10); LUPC Regs. § 10.23,I(3)(d)(8).
- Adequate buffering -- 12 M.R.S. § 685-A(10); LUPC Regs. § 10.23,I(3)(d)(8).
- Satisfaction of LUPC development standards -- LUPC Regs. Ch. 10.25.
- Satisfaction of LUPC dimensional requirements -- LUPC Regs. Ch. 10.26.

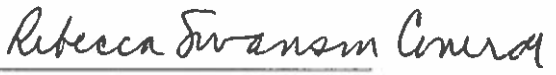
We are ready and able to participate in the hearing. We do not envision taking a substantial role in the hearing, but are convinced we have an important point to make on the subject of

impacts and benefits. We are willing to be consolidated with another intervenor for the sake of efficient use of the Commission's time, and our own. I will be our spokesperson.

III. Conclusion

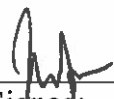
Our community is at a crossroads, and the benefits from this Project could make a huge positive impact for a generation. We would be irresponsible not to seek a role in offering testimony that is relevant to the Commission's consideration. We have the resources and the expertise to make a meaningful contribution to this case. The LA Metro Chamber is representative of the enthusiasm for the Project in communities up and down the corridor. We believe we have satisfied the requirements for intervention under the applicable regulations and respectfully seek to intervene in this proceeding as a party.

Date: August 2, 2018


Rebecca Swanson Conrad
President & CEO
Lewiston Auburn Metropolitan Chamber

State of Maine
County of Androscoggin

Before me on this 2nd day of August 2018, personally appeared the above-subscribed Rebecca Swanson Conrad, and made oath that the statements contained are true and correct to the best of her knowledge, information and belief.


Signed:
Notary Public, Maine
My Commission Expires 5/19/19

Hinkel, Bill

From: Stephanie Lanman <slanman8@gmail.com>
Sent: Thursday, August 02, 2018 4:38 PM
To: Hinkel, Bill
Subject: Please stop the transmission line!

Dear Bill,

Please accept this letter as a petition against the approval of the CMP Powerline Corridor from Auburn to Beattie TWP on the Canadian border. There are many reasons why I do not approve of this project but the main reason is the effect it will have on the outdoors and the minimal (at best) research showing it will actually have a positive impact on the environment. Please, please listen to the people this will be affecting directly and help us stop this.

Regards,

Stephanie Lanman
617-833-7922

Hinkel, Bill

From: Libby Lauze <llauze22@gmail.com>
Sent: Thursday, August 02, 2018 3:09 PM
To: Hinkel, Bill
Subject: RE: New England Clean Energy Connect Project

State of Maine
Land Use Planning Commission
In Re: New England Clean Energy Connect Project

Please accept this letter as a petition *against the approval* of the CMP Powerline Corridor from Auburn to Beattie TWP on the Canadian border.

I own a camp in Upper Enchanted Township. My husband grew up fishing for brook trout in this part of the state. We chose this location for our camp to introduce our children to Maine's natural beauty and instill in them a love of the outdoors and the wilderness. We are heartbroken to think that this legacy of unspoiled natural wilderness could be damaged in order to provide power to another state.

Additionally, the harm to native brook trout, deer beds, and other wildlife caused by high voltage lines, construction, heavy vehicle traffic, clear cutting and the after effects of all these elements will cause years of lasting negative impact on the environment.

The value of Maine's natural beauty, resources and wilderness is worth more than anything to come out of this power line project.

Please consider the conclusions of environmental experts and the Maine Department of Inland Fisheries and Wildlife regarding the negative impacts of this connector project.

I oppose the approval of this project and I am counting on the LUPC Board to help save this beautiful wilderness from an unnecessary power line.

Respectfully submitted,
Elizabeth Lauze
78 Madeline St, Portland, ME and
Grace Pond, ME, Upper Enchanted Township
207-332-8906
llauze22@gmail.com

Hinkel, Bill

From: scott secondnaturetree.com <scott@secondnaturetree.com>
Sent: Thursday, August 02, 2018 7:32 AM
To: Hinkel, Bill
Subject: No CMP Corridor

Dear Mr. Hinkel,

I am yet another opponent of the CMP corridor from Canada to Mass. Please include me in the long list of people who want to preserve the Maine wilderness and particularly the Kennebec River Gorge. This proposed corridor is only good for a few who stand to profit financially. There is more to profit than financial. With the passing of this proposed project you will be forfeiting that which money can't buy. You will be forfeiting much of what makes Maine the remote destination that we are proud to be. You will be reducing us to an extent that will not be salvageable. You will diminish us.

Scott

Scott MacKenney
Owner / Operator Second Nature Tree Service
55 Grand Army Rd.
Whitefield, ME 04353
(207) 549-3683

Hinkel, Bill

From: gcaruso@myfairpoint.net
Sent: Thursday, August 02, 2018 8:24 AM
To: Hinkel, Bill
Subject: Petition to Intervene NECEC Project
Attachments: LUPC intervention for NECEC.doc

Please see attached letter

Maine Guide Service, LLC
Greg Caruso, Master Maine Guide
81 West Shore Rd., PO Box 81
Caratunk, ME 04925
207.672.3627
207.858.3627
gcaruso@myfairpoint.net

~~Jim Beyer
Bureau of Land Resources
Maine Land Use Planning Commission
22 State House Station
Augusta, Maine 04333-0022~~
~~Department of Environmental Protection
106 Hogan Rd, Suite 6
Bangor, Maine 04401~~

~~Aug 2~~ July 19, 2018

Re: Petition to intervene in CMP's Application for Site Location of Development Act permit and Natural Resources Protection Act permit for the New England Clean Energy Connect ("NECEC") from Québec-Maine Border to Lewiston and Related Network Upgrades

~~Re: New England Clean Energy Connect Project- SLC-9
No. L-27625-26-A-N~~

Dear ~~Sir or Madame~~ Mr. Beyer,

Please find this written letter, emailed and postal mailed, as a **petition for intervention** in Central Maine Power Company's application for their New England Clean Energy Connect project. Maine Guide Service, LLC, operating on the Kennebec River and in The Forks, W Forks and Caratunk, is within the project boundaries and is, therefore, directly and indirectly affected.

On March 21, 2018, I was present while a CMP representative pitched a brief, overview presentation to the Caratunk Selectmen regarding this project. However, since that time, much information has been brought to light. I have grave concerns for the welfare of my fishing, hunting, rafting business as well as being a citizen of the Town of Caratunk and the State of Maine should this project be brought to fruition.

1. The mitigation proceedings for the last two years have been secretive and not representative of all area businesses and residents. The mitigation has been clearly swayed to benefit the few companies that are in the MOU, Western ~~M~~mountains and Rivers Corporation LLC.
2. As a business owner within the project boundaries, I operate as a fishing guide on the Kennebec, ferry Appalachian Trail hikers across the Kennebec, guide hunting, snowmobiling, and ATV tours in The Forks Area.
3. This project is forcing 1000' of transmission lines across a Scenic and Wild River, the Kennebec River, where I make my livelihood in the whitewater rafting and fishing tourism industry. This is a direct detriment to my business and my family. I am interested and willing to participate and be represented in permitting decisions for this application.
4. I have asked CMP to move the project's river crossing to a less obtrusive and view-obstructing location such as at the dam or over the narrow gorge in order to preserve the "Wild and Scenic" character of our trips.

5. Should this project go forth as stated, Maine energy would be locked up and prevented from engaging in any future solar or offshore wind projects. The town I live in, Caratunk, has already twice supported NextEra for a solar farm within its boundaries. One such solar project lost in direct competition to this NECEC. The valuation benefit from CMP's additional transmission lines does not even compare to a large solar project in Caratunk. I am opposed to the NECEC project if it prevents future renewable energy opportunities that provide for a huge tax benefit to Caratunk landowners and significantly increase the Caratunk valuation.
6. This project is not benefiting the Maine ratepayer with lower rates or cleaner energy. In fact, it may increase greenhouse gas emissions. I have an interest in lower energy costs and clean energy sources.
7. This project is not financially beneficial to the Maine economy or its residents.
8. Independent PUC consultants have found that CMP's project application boasts inflated economic and financial benefits.
9. Green and environmental agencies as well as the Maine Legislature's Committee of Environmental and Natural Resources and the Maine Legislature's Committee on Energy, Utilities and Technology have stated concerns on this project.

As it is proposed, I cannot see supporting the NECEC. I see this project as benefiting Hydro-Quebec and the Commonwealth of Massachusetts at the expense of my livelihood and the State of Maine. This should not be so. If granted intervenor status, I affirm that I am able to participate in the proceedings in good faith as the spokesperson for the Maine Guide Service, LLC. Thank you for the opportunity to intervene and to provide comments to the ~~LUPC~~ ~~DEP~~ hearings, etc.

Sincerely,

Gregory J. Caruso
Master Maine Guide
Maine Guide Service, LLC



State of Maine
Office of the Public Advocate
112 State House Station, Augusta, Maine 04333-0112
(207) 624-3687 (voice) 711 (TTY) www.Maine.gov/meopa

Paul R. LePage
GOVERNOR

Barry J. Hobbins
PUBLIC ADVOCATE

August 23, 2018

Bill Hinkel
Maine Department of Agriculture, Conservation and Forestry
Land Use Planning Commission
22 State House Station
Augusta, Maine 04333

RE: Central Maine Power Company, NECEC proceedings

Dear Mr. Hinkel:

Now comes the Maine Office of the Public Advocate (“OPA”) and, pursuant to Chapter 5.13 of the Land Use Planning Commission’s rules, petitions for intervenor status in the above-referenced proceeding. The OPA represents the ratepayers of Central Maine Power Company (“CMP”) pursuant to Chapter 17 of Title 35-A and thus has authority to intervene in this matter. Pursuant to Title 35-A M.R.S. Section 1702(5), the OPA is statutorily authorized to participate in matters before state agencies when “the subject matter of the action affects the customers of any utility . . . doing business in this State.”

CMP seeks one or more permits from this agency in order to construct a high voltage direct current (“HVDC”) transmission line from the Canadian border in Beattie Township to a converter station in Lewiston. This line would go through unorganized townships and incorporated towns and cities in the State of Maine. While CMP has pledged to the Public Utilities Commission that the line will be constructed and operated at no cost its ratepayers, it nevertheless has the potential to affect ratepayers in other ways. For example, the line would be built next to the property of many ratepayers who may have concerns about the safety and aesthetics of the line. Further, the resources CMP needs to employ to develop and operate the line may adversely affect its ability to provide safe, adequate and reliable electric service to its Maine customers.

The OPA did not receive the Notice of Opportunity to Intervene and thus has good cause for this late intervention. Thus, the OPA respectfully seeks late intervention.

Respectfully submitted,

Barry J. Hobbins
Public Advocate

Hinkel, Bill

From: sshores <sshores@fairpoint.net>
Sent: Thursday, August 02, 2018 10:36 AM
To: Hinkel, Bill

Please add my name to the petition my name is Vincent Mecca date of birth is [REDACTED] home address is 10 parsell Road Washington Maine old 4574 if you need any other info let me know. I am definitely opposed to move by CMP to put in this line through the Maine Woods. Doing nothing or very little for the state of Maine
Thank You Vince Mecca

Sent from my Verizon Wireless 4G LTE smartphone

Hinkel, Bill

From: Edward Muzeroll <eamuzer57@hotmail.com>
Sent: Thursday, August 02, 2018 12:22 PM
To: Hinkel, Bill
Subject: CMP

Hello Bill,

I hope that 145 mile power line does not happen!!! Maine gets nothing but destruction of OUR land and we are all tired of being used!!!

Edward Muzeroll

Sent from my iPhone

Hinkel, Bill

From: Candice Pierce <CPierce@dwmlaw.com>
Sent: Thursday, August 02, 2018 12:28 PM
To: Hinkel, Bill
Cc: Joanna B. Tourangeau; 'brian.j.murphy@nee.com'
Subject: CMP NECEC Project
Attachments: 18-08-02 Petition to Intervene in LUPC proceedings.PDF

Good Afternoon Mr. Hinkel:

On behalf of Joanna Tourangeau, I have attached NextEra Energy Resources, LLC's Petition to Intervene in the LUPC proceedings for the CMP NECEC Project.

Please do not hesitate to contact me if I can be of any further assistance.

Best,
Candice

Candice Pierce
Legal Assistant

207.253.0576 Direct
CPierce@dwmlaw.com

84 Marginal Way, Suite 600, Portland, ME 04101-2480
800.727.1941 | 207.772.3627 Fax | dwmlaw.com

DrummondWoodsum
ATTORNEYS AT LAW

The information transmitted herein is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Unintended transmission shall not constitute waiver of any privilege, including, without limitation, the attorney-client privilege if applicable. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the e-mail and any attachments from any computer.

August 2, 2018

Via Federal Express and Electronic Mail

Bill Hinkel, Permitting and Compliance Regional Supervisor
Maine Land Use Planning Commission
22 State House Station
Augusta, ME 04333-0022

RE: CMP NECEC Project

Dear Bill:

Enclosed for filing please find NextEra Energy Resources, LLC's Petition to Intervene in the CMP NECEC Project.

Thank you for your assistance with this matter. Please do not hesitate to contact me with any questions or concerns.

Sincerely,



Joanna B. Tourangeau

JBT/cp

Enclosure

cc: Brian J. Murphy, Esq.

STATE OF MAINE
LAND USE PLANNING COMMISSION

CENTRAL MAINE POWER COMPANY)
Site Law Certification for)
the New England Clean Energy Connect)
Consisting of the Construction of a 1,200 MW)
HVDC Transmission Line from the Quebec-Maine)
Border to Lewiston)
And Related Network Upgrades)
)
)

**PETITION TO
INTERVENE OF
NEXTERA ENERGY
RESOURCES, LLC**

NextEra Energy Resources, LLC (“NEXTERA”), by and through its undersigned attorney, hereby files this request to intervene in the above captioned proceeding.

On September 27, 2017, Central Maine Power (“CMP”) filed an Application with the Maine Department of Environmental Protection (“Department”) pursuant to Maine’s Site Location of Development Act and Natural Resource Protection Act to construct the New England Clean Energy Connect 1,200 megawatt (“MW”) high voltage direct current (“HVDC”) transmission line from the Quebec-Maine border to a new converter station in Lewiston and related upgrades (“NECEC”). Pursuant to 12 M.R.S. § 685-B(1-A)(B-1), prior to issuance of any approval, the Department must receive certification from the Land Use Planning Commission (the “Commission”) that the NECEC is an allowed use within the Recreation Protection subdistricts for which it is proposed and that it meets any land use standards established by the Commission.

In accordance with the Chapter 5, Section 5.13 of the Commission’s Rules, any party demonstrating that it is or may be “substantially and directly affected” by a Commission proceeding may “intervene as a party to the proceeding.” 01-682 CMR Ch.5. On July 12, 2018, the Commission issued a Notice of Opportunity to Intervene. For the reasons described more fully below, NEXTERA is substantially and directly affected by CMP’s Application due to NEXTERA’s development of wind and solar projects in close proximity to the proposed NECEC project and by its ownership of existing generation assets in Maine. NEXTERA, therefore, requests that the Commission grant this petition for leave to intervene as a party to Commission proceedings regarding the NECEC.

NEXTERA is a limited liability company organized under the laws of Delaware, with its principal place of business at 700 Universe Blvd, Juno Beach, Florida 33408. NEXTERA is the indirect owner of the 36 MW Cape Energy Station; the 827 MW W.F. Wyman Station (100% owner of Units 1, 2, and 3 and majority owner of Unit 4); and the 16.2 MW Casco Bay Storage Project, as well as a number of wind, solar, and storage projects under development in Maine,

including Penobscot Wind, LLC, Moose Wind, LLC, and Wintergreen Solar, LLC. Development of the NECEC will impact the operation of these generating assets. For example, the proposed NECEC transmission line would route directly through the proposed development area of the Moose Wind, LLC project and the Wintergreen Solar, LLC project, which would directly and adversely impact the ability of these generation projects to access and interconnect to the transmission grid and the ISO-NE market, because the NECEC line is proposed as a HVDC line which is not conducive to interconnecting Maine-based renewable generating projects. Thus, NEXTERA is substantially and directly affected by the proposed amendment.


NEXTERA therefore respectfully requests Intervenor status in the above captioned proceedings.

NEXTERA also requests that the following be added to the service list for this matter:

Joanna B. Tourangeau
84 Marginal Way, Ste. 600
Portland, ME 04101
Office phone: (207) 253-0567
E-mail: jbtourangeau@dwmlaw.com

Brian J. Murphy
Senior Attorney
NextEra Energy Resources, LLC
700 Universe Blvd. (LAW/JB)
Juno Beach, FL 33408
Office phone: (561) 694-3814
Cell: (561) 236-7461
Fax: (561) 691-7135
E-mail: brian.j.murphy@nee.com

Date: August 2, 2018



Joanna B. Tourangeau, Me. Bar No. 9125
Attorney for NextEra Energy Resources, LLC

Hinkel, Bill

From: Cathy Johnson <cjohnson@nrcm.org>
Sent: Thursday, August 02, 2018 4:25 PM
To: Hinkel, Bill
Cc: Sue Ely; Dylan Voorhees; Nick Bennett
Subject: FW: NRCM Petition to Intervene in CMP's NECEC - SLC 9
Attachments: NRCM Petition to Intervene Exhibit 1.pdf; NRCM Petition to Intervene cj.pdf; DOC080218-08022018151729.pdf

Hi Bill – We are resubmitting our petition to intervene which now has the Verification for the Petition to Intervene included.

Let me know if you have questions.

Cathy

Catherine B. Johnson, Esq.
Senior Staff Attorney & Forests and Wildlife Project Director
(207) 430-0109 office (207) 462-2164 cell

From: Sue Ely
Sent: Thursday, August 02, 2018 1:51 PM
To: Hinkel, Bill
Cc: Cathy Johnson; Dylan Voorhees; Nick Bennett
Subject: NRCM Petition to Intervene in CMP's NECEC - SLC 9

Mr. Hinkel,

Attached, please find NRCM's Petition to Intervene in Central Maine Power's application for a Site Law Certification (SLC-9) for the New England Clean Energy Connect high voltage direct current transmission line running from the Québec-Maine Border to Lewiston and related network upgrades. A paper copy of this Petition to Intervene was mailed to your office today.

Respectfully,

Susan Ely
Clean Energy Policy Advocate & Staff Attorney
Natural Resources Council of Maine
3 Wade Street
Augusta, ME 04330
Email: sely@nrcm.org
Phone: (207) 430-0175

STATE OF MAINE
LAND USE PLANNING COMMISSION

In Re: New England Clean Energy Connect Project - SLC-9

PETITION TO INTERVENE
OF
NATURAL RESOURCES COUNCIL OF MAINE

The Natural Resources Council of Maine (NRCM) petitions the Maine Land Use Planning Commission (Commission) to intervene as a party in Central Maine Power's (CMP's) application for a Site Law Certification (SLC-9) to the Department of Environmental Protection for the New England Clean Energy Connect (NECEC) high voltage direct current (HVDC) transmission line running from the Québec-Maine Border to Lewiston and related network upgrades. NRCM seeks leave to intervene pursuant to the Maine Administrative Procedures Act and the Commission's Rules and Regulations, Chapter 5, § 5.13.

In support of this Petition, NRCM states the following:

1. NRCM is a not-for-profit tax-exempt corporation dedicated to the protection of Maine's environment and the wise use of the state's natural resources through a program of advocacy, legal defense, and education. NRCM has a membership and support base of 20,000 individuals and families who reside, own property, and recreate throughout the state of Maine.
2. NRCM has over 9,000 members and supporters who reside, own and operate businesses, and recreate in Somerset, Kennebec, Androscoggin, Lincoln, and Cumberland Counties.
3. Since its establishment in 1959, the Council has advocated for the protection of important natural resources and wise land use before both the Maine State Legislature and administrative agencies. It has intervened in multiple proceedings before the Land Use

Planning (formerly Regulation) Commission and has participated regularly in public hearings regarding development proposals, proposed rule changes, and policy discussions. Recently, the Council intervened in the proceeding regarding Irving's proposed Fish River Chain of Lakes Concept Plan and has participated in public hearings, stakeholder groups, and focus groups on the issue of adjacency, revision of subdivision rules, and on the recreational lodging rule changes. The Council intervened in Plum Creek's proposed Concept Plan for Moosehead Lake, ZP 707 and in Burnt Jacket, LLC's application for rezoning of land on Moosehead Lake, ZP 701. The Council also provided extensive testimony on LURC's most recent amended Comprehensive Land Use Plan. The Council has played a leading role before the Legislature and administrative agencies in promoting sound land use planning. The Council has been involved in a multitude of advocacy initiatives to protect the undeveloped remote character of Maine's North Woods.

4. NRCM also has a strong history of promoting Maine-grown clean renewable energy sources to achieve cleaner, healthier air and water for Maine and to make Maine less dependent on imported energy and advance our economy.

5. On December 11, 2017, NRCM, Maine Audubon, and Appalachian Mountain Club submitted a petition to the Commission for a public hearing on this matter. *See Exhibit 1*. At its December 19, 2017, meeting the Commission decided to hold a public hearing. *Id.*

6. NRCM seeks to intervene in this proceeding due to significant concerns over the environmental, natural resources, and climate change impacts that this proposed project could have in Maine. For example, this project would cut a brand new, 53-mile-long corridor across Maine's western mountains, harming forests, streams, wetlands, wildlife, and scenic beauty; it would cross the iconic Kennebec Gorge; it would suppress the development of clean

renewable energy (like wind and solar) in Maine; and it is unlikely to reduce climate change emissions, and could even increase them.

7. Relevant statutory and regulatory criteria may include, but are not limited to, the criteria set forth in any land use standards established by the Commission that are not duplicative of those considered by DEP in its review of the project under the Site Location of Development Law, 12 M.R.S. § 685-B(1-A)(B-1); and the P-RR subdistrict, Land Use Districts and Standards, Chapter 10, Section 10.23,I,3,d,8.

8. NRCM is currently also an intervenor in the proceeding before the Maine Public Utilities Commission on CMP's application for a Certificate of Public Convenience and Necessity for the NECEC and has submitted a petition to intervene in the proceeding before the Department of Environmental Protection.

9. If granted leave to intervene, NRCM intends to participate fully as a party, including cross-examination of the applicant's witnesses at the hearing, submission of post-hearing statements and argument, and possible judicial appeals.

10. NRCM and its members and supporters will be "substantially and directly affected by the proceeding," given NRCM's and its members' and supporters' strong commitment to the protection and wise use of Maine's North Woods.

For the above reasons, NRCM requests that this Petition for Intervention be granted.

Date: August 2, 2018

Respectfully submitted,



Susan Ely
Clean Energy Policy Advocate & Staff Attorney
Natural Resources Council of Maine
3 Wade Street
Augusta, Maine 04330

VERIFICATION OF PETITION FOR INTERVENTION

I, Susan J Ely, being first duly sworn, affirm that:

I represent the Natural Resources Council of Maine;

I have drafted, reviewed and signed the Petition to Intervene filed by the Council in the proceeding before the Land Use Planning Commission on the application by CMP for a Site Law certification for the proposed NECEC transmission line;

I have personal knowledge of the facts set forth in the description of the Council and the description of the membership of the Council;

I am authorized by the Council to execute this verification to the Petition to Intervene.


Date: Aug. 2, 2018



Susan J Ely
Staff Attorney
Natural Resources Council of Maine

Personally appeared the above-named Sue Ely and made affirmation that the facts contained in this Verification are true.

Date: Aug. 2, 2018


Notary Public Attorney at Law
CATHERINE B. JOHNSON



PAUL R. LEPAGE
GOVERNOR

STATE OF MAINE
DEPARTMENT OF AGRICULTURE, CONSERVATION & FORESTRY
LAND USE PLANNING COMMISSION
22 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0022

NRCM Petition to Intervene - Exhibit 1

WALTER E. WHITCOMB
COMMISSIONER

NICHOLAS D. LIVESAY
EXECUTIVE DIRECTOR

December 21, 2017

Eliza Donoghue
Senior Policy & Advocacy Specialist
Maine Audubon
edonoghue@maineaudubon.org

Dylan Voorhees
Clean Energy Director
Natural Resources Council of Maine
dvoorhees@nrcm.org

Kaitlyn Bernard
Maine Policy Manager
Appalachian Mountain Club
kbernard@outdoors.org

Sent by electronic mail only

**RE: Central Maine Power's New England Clean Energy Connect Project (NECEC)
Request for public hearing**

Dear Ms. Donoghue, Mr. Voorhees, and Ms. Bernard:

At its December 19, 2017, regular business meeting in Bangor, Maine, the Commission considered your request for a public hearing on the allowed use portion of the NECEC project submitted on December 11, 2017 (copy attached). The Commission voted and decided that it will allow a public hearing on this matter on a date to be determined following consultation with Commission staff and the Maine Department of Environmental Protection.

The Commission staff will provide additional information regarding the scheduling and logistics of the public hearing once available. Please direct inquiries related to the Commission's certification of this project to my attention.

Regards,



Bill Hinkel
Regional Supervisor
Land Use Planning Commission
Ph: 207-446-8823
e-mail: bill.hinkel@maine.gov

xc: Gerry Mirable, CMP
Matthew Manahan, Pierce Atwood, LLP
Maine DEP staff
LUPC staff

Request for Public Hearing

Appalachian Mountain Club, Maine Audubon, Natural Resources Council of Maine

December 11, 2017

RE: Central Maine Power's New England Clean Energy Connect Project, Request for Certification

Dear Ms. Horn:

On behalf of the Appalachian Mountain Club, Maine Audubon, and the Natural Resources Council of Maine, please accept this request for a public hearing on the allowed use determination portion of the Commission's certification of Central Maine Power's (CMP) New England Clean Energy Connect (NECEC) project. Our organizations feel strongly that a public hearing would assist the Commission in their evaluation of whether the portion of the NECEC located in P-RR (Recreation Protection) and P-WL (Wetland Protection) subdistricts will satisfy the special exemption criteria necessary to make an allowed used determination. See Chapter 10, Sections 10.23,I,3,d,8 and 10.23,N,3,d,9.

Specifically, we desire to offer evidence on the conservation, scenic, recreational, and wetland resources impacted by this project—information that is likely very different from the information presented by CMP. CMP's primary function and expertise is the operation of poles, wires, and other infrastructure that makes up the electricity grid. In contrast, the staff and members of our organizations have decades of experience working to understand, improve, and protect the conservation, scenic, recreational, and wetland resources in Maine and in the part of the state impacted by this project in particular.

As recommended by a Commission staff memorandum dated December 7, 2017, we request that the hearing be coordinated with the Maine Department of Environmental Protection.

Respectfully submitted,

Eliza Donoghue
Senior Policy & Advocacy Specialist
Maine Audubon

Dylan Voorhees
Clean Energy Director
Natural Resources Council of Maine

Kaitlyn Bernard
Maine Policy Manager
Appalachian Mountain Club

Hinkel, Bill

From: Audrey Parks <audrey.e.gould@gmail.com>
Sent: Thursday, August 02, 2018 12:59 PM
To: Hinkel, Bill
Subject: Petition against the approval of the CMP Powerline Corridor

Dear Mr Hinkel,

Please accept this letter as a petition against the approval of the CMP Powerline Corridor from Auburn to Beattie TWP on the Canadian border. I am a resident of Carrabassett Valley and own a Pharmacy in Kingfield. My business relies heavily on the tourism of this pristine wilderness which people come here to enjoy. We enjoy recreating in the forks region.

Tourism is very important to our state's economy. People I have talked to are worried about the impact of such a large line being constructed through these large natural areas.

I am the last one to be against a project that will provide an economic gain to the state. However, this is a project that will only benefit CMP, and Canada. The jobs that would be added in Maine would be short-term and not sustained. There is no benefit to Maine, only to a corporation based in Spain.

Countless environmental groups and our even own Department of Inland Fisheries and Wildlife are opposed to this initiative. I ask that you consider their educated and expert conclusions with respect to wildlife and environmental impact.

We are counting on you and the LUPC board to preserve this beautiful area.

Sincerely,

Audrey Parks

Carrabassett Valley, ME

Hinkel, Bill

From: Jeffrey Reardon <Jeffrey.Reardon@tu.org>
Sent: Thursday, August 02, 2018 3:55 PM
To: Hinkel, Bill
Cc: 'Kathy Scott'; 'David Hedrick'
Subject: Trout Unlimited intervention, NECEC
Attachments: NECEC, TU Intervention LUPC, 8-2-2018.pdf

Please find our motion to intervene attached.

Jeff



Jeff Reardon / Maine Brook Trout Project Director
jreardon@tu.org / 207 615 9200

Trout Unlimited
207 430 8441
267 Scribner Hill Road, Manchester, ME 04351
<http://www.tu.org>



August 2, 2018

Bill Hinkel, Maine Land Use Planning Commission
Maine Land Use Planning Commission
22 State House Station
Augusta, ME 04333-0022

RE: NECEC Petition for Leave to Intervene

Dear Mr. Hinkel:

On behalf of Trout Unlimited (TU), the Maine Council of Trout Unlimited (ME TU), and the Kennebec Chapter of Trout Unlimited (KVTU), we are submitting this petition to intervene, pursuant to the Maine Administrative Procedures Act and the Chapter 5, Section 5.13 of the Maine Land Use Planning Commission's rules, in the Commission's review of applications for Central Maine Power's (CMP) New England Clean Energy Connect (NECEC) transmission line. CMP seeks permits for construction under the Site Location of Development Act and the Natural Resources Protection Act, and the Commission will need to determine whether the proposed activities to construct and maintain the NECEC are an allowed use in the subdistricts within which it is proposed and whether the project meets the Commission's land use standards. We note that a utility corridor in the P-RR district requires a special exception, for which the applicant must demonstrate (1) that there is no alternative site suitable for the proposed development and reasonably available; and (2) that the use can be buffered from other uses likely to be affected by the development. We are particularly concerned about the project's potential impacts on brook trout habitat and angling, on riparian buffers along streams, and on the potential for increased access by ATV to remote ponds with outstanding or significant fisheries and other values and ponds designated as "State Heritage Fish Waters" by the Maine Department of Inland Fisheries and Wildlife. Some of these ponds are Management Class 6 ponds and others in Management Class 1.

1. TU and TU members will be substantially and directly impacted by the NECEC. TU is a national conservation organization whose mission is to conserve, protect and restore North America's trout and salmon and their watersheds. We have 5 chapters and about 1800 members in Maine, including the Kennebec Valley chapter, whose "catchment area" for

membership includes most of the area impacted by the proposed route of the NECEC. Our five Maine chapters are organized into a Maine Council, with delegates from each chapter serving as the board of directors for the Maine Council. Most members of Trout Unlimited are anglers who enjoy fishing the waters that will be impacted by the NECEC, as well as other recreation in the affected area.

Our active members commit thousands of hours per year to habitat conservation, habitat protection and advocacy projects. For more than 25 years, the Kennebec River has been a primary focus area for TU, ME TU and KVTU efforts. TU has intervened in the FERC licensing of every major hydropower project in the Kennebec Basin since 1990. We were party to settlement agreements regarding the FERC licensing of projects including the Indian Pond Project, the Madison Electric Works Project, the Anson and Abenaki Projects, and participated in the licensing process for the Moosehead, Flagstaff, Wyman, Williams, Shawmut, and Lockwood Projects. This advocacy resulted in: (1) the conservation of extensive lands around Indian Pond, the Kennebec River, Wyman Lake, and other nearby lands that the NECEC will cross or from which the NECEC will be visible; and (2) funding to construct habitat restoration projects in the Upper Kennebec and Dead River watershed in Salmon Stream and Cold Stream, both of which will be crossed by the NECEC. TU advocated for more than a decade to protect the 8,200-acre Cold Stream Forest parcel for the explicit purpose of protecting intact habitat for native brook trout. Cold Stream Forest was acquired by the state of Maine with funding from the Land for Maine's Future Program and the federal Forest Legacy Program with the explicit purpose of protecting outstanding brook trout habitat and deer yards. The NECEC will bisect the Cold Stream Forest Public Reserved Lands with a crossing near the Capital Road. TU has also been involved with many other conservation organizations in efforts to conserve lands adjacent to the Kennebec River Gorge, which the NECEC proposes to cross. (Despite a 2010 agreement between CMP and the State of Maine to transfer those lands to the state as mitigation for CMP's last major transmission line project, the state has not yet taken ownership.)

Our members' documented use of and conservation work on the lands and waters crossed by the NECEC and our conservation interest in the brook trout and Atlantic salmon populations in waters affected by the project give TU and our members a clear interest in these proceedings. Our existing conservation work and the fish species at the core of our mission will be substantially and directly impacted by the NECEC.

2. TU Concerns and Interests

Consistent with our mission, TU's primary concern will be the impacts of the project on habitat for cold water fish from construction and maintenance activities associated with the NECEC. These concerns extend along the full length of proposed new and upgraded transmission lines. The entire proposed route from the Canadian border in Beattie TWP to east of the Kennebec

River crossing in Moxie Gore is documented habitat for native brook trout, as is most of the route from Moxie Gore to the Kennebec River crossing in Moscow. Other streams on the remainder of the route support wild brook trout.

The NECEC will cross 724 water bodies, including some of the most important brook trout spawning and rearing tributaries to the Dead and Kennebec rivers. Construction access roads will span 184 streams. A large amount of currently forested habitat will be cleared for construction, and much of this will be permanently converted to cleared corridors. Clearing and construction of access roads and tower foundations may cause sedimentation and other impacts on water quality. Maintained corridors in riparian areas will remove trees that provide shade and will likely raise stream temperatures. We will be advocating for protection of permanent forested buffers on all waterbodies crossed, approached, or paralleled by the NECEC, including intermittent headwater streams. CMP's proposed 25-foot-wide buffer is not adequate.

Geographic areas of particular concern include the ~50 miles of proposed new corridor from Beattie township to West Forks, which contains an especially dense concentration of wild brook trout habitat. In addition to concerns about impacts on streams, the route in this area passes very close to a number of ponds designated "State Heritage Fish Waters," many of which were also identified in the Maine Wildlands Lake Assessment for fisheries and other values, including Beattie Pond (Management Class 6, Significant Fisheries Value), Rock Pond (Management Class 1B, Outstanding Fisheries Value, Significant+ Scenic Value), Iron Pond (Management Class 2, Significant Fisheries Value), Mountain Pond #2, Markham Pond, Little Wilson Hill Pond, and Wilson Hill Pond. Tobey Pond, though it is not designated as a State Heritage Fish Water, appears to meet the criteria for inclusion, and was identified for Outstanding Fisheries Value in the Maine Wildlands Lake Assessment, and is Class 1B. A particular concern is that CMP is touting as a "community benefit" the establishment of ATV trails along the NECEC right of way. The NECEC passes in close proximity to these waters, many of which are either Management Class 6 or assessed as "inaccessible".

Like many other members of the public, we are concerned about the impacts of the proposed Kennebec Gorge crossing on angling and other recreation in an especially remote and beautiful part of Maine where we have invested a considerable amount of work. We are also concerned that the NECEC will change the experience that anglers and other users have of waters crossed by or close to the NECEC route. Many of these streams and ponds are currently remote, accessed primarily by bushwhacking, and offer a solitary and remote angling experience in high quality habitat. The NECEC will put a permanently cleared corridor across and near some of western Maine most productive and popular remote stream fisheries, including the headwaters of the Moose River, Enchanted Stream, Salmon Stream, Mountain Brook, Cold Stream, Tomhegan Stream, and Moxie Stream. CMP has proposed to create an ATV corridor

along the NECEC, which will provide a new motorized access route to some of western Maine's most remote streams and ponds. This will permanently change the use pattern on these waters and degrade the existing remote, high value angling experience.

To avoid we these impacts, and the habitat impacts of multiple stream crossings in the Cold Stream watershed, we will ask the Commission to thoroughly evaluate alternative routes, including an alternate route north of the proposed NECEC that would cross the Kennebec River at Indian Pond Dam. We will also ask the Commission to consider siting and sizing of transmission line poles that would preclude the need for riparian clearing on stream crossings. (CMP is already proposing this approach for the Kennebec River crossing and given the steep terrain and proposed height of transmission towers, it should be feasible for other crossings as well. We will seek clarity about what portion of the proposed line CMP seeks to maintain as ATV and/or 4WD vehicle access routes, and whether this is appropriate, particularly in proximity to sensitive unbridged streams and remote ponds. We believe the NECEC will not meet the Commissions standards without significant changes to better protect brook trout habitat and the remote angling experience.

TU is prepared and capable to serve as an intervenor.

TU has extensive experience as an intervenor in FERC hydroelectric licensing and has previously intervened in proceedings at the (former) Land Use Regulatory Commission and testified at LUPC hearings on several occasions. TU staff (Jeff Reardon) and volunteers frequently testify at BEP, LUPC and legislative hearings. We are fully prepared to fulfill our responsibilities as an intervenor. Many TU volunteers will be involved in TU's review of the application, with leadership from David Hedrick, a TU member who lives in Waterville and serves on the board of KVTU as a delegate to TU's Maine Council. Mr. Hedrick has been involved in TU leadership for more than a decade. TU's Maine Brook Trout Project Director, Jeff Reardon, will coordinate with TU volunteers. Mr. Reardon has been employed by TU since 1999, and has extensive experience working with state and federal regulatory agencies as both an applicant and an interested party.

No other party represents TU's particular interest.

No other state potential intervenor has TU's combination of a mission focused on coldwater fish habitat, extensive knowledge of the waters to be affected by the NECEC, and an active and engaged membership with a long history of advocacy for cold water fish habitat.

Thank you for your consideration of our request. Please direct any correspondence to me and to Mr. Hedrick at the contact information below (email preferred).

Jeff Reardon
267 Scribner Hill Road

David R. Hedrick
3 Patricia Terrace

Manchester, ME 04351
(207) 430-8441
jreardon@tu.org

Waterville, ME 04901
(207) 509-9803
dhedrick@roadrunner.com

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff R." followed by a stylized flourish.

Jeff Reardon

Hinkel, Bill

From: York, Mary
Sent: Thursday, August 02, 2018 11:20 AM
To: Hinkel, Bill
Cc: Livesay, Nicholas
Subject: FW: Message from "RNP002673D09DA7"
Attachments: 20180802112353439.pdf

FYI...Petition to Intervene

The original is in your office...

Mary York
Land Use Planning Commission
18 Elkins Lane, 4th Floor
22 State House Station
Augusta, ME 04333
207-287-2631 (P) 207-287-7439 (F)
www.maine.gov/dacf/lupc

-----Original Message-----

From: RNP29302C@w2k.state.me.us [mailto:RNP29302C@w2k.state.me.us]
Sent: Thursday, August 02, 2018 11:24 AM
To: York, Mary <Mary.York@maine.gov>
Subject: Message from "RNP002673D09DA7"

This E-mail was sent from "RNP002673D09DA7" (MP 3054).

Scan Date: 08.02.2018 11:23:52 (-0400)
Queries to: RNP29302C@w2k.state.me.us

Hinkel, Bill

From: Mike Novello <mnovello@wagnerforest.com>
Sent: Wednesday, August 01, 2018 10:26 AM
To: Hinkel, Bill
Subject: Re: New England Clean Energy Connect Intervention
Attachments: WFM Intervention Petition.pdf

Bill,
Please see attached petition to intervene.

Based upon the notice, it appears that email is sufficient - please let me know if you also need me to overnight a physical copy.

Thank you,
Mike

Mike Novello
150 Orford Road, PO Box 160
Lyme, NH 03768

Direct: (603) 208-2003
Cell: (603) 667-0775

On Jul 30, 2018, at 7:42 AM, Hinkel, Bill <Bill.Hinkel@maine.gov> wrote:

Dear Mr. Novello:

The Site Location of Development Law and Natural Resources Protection Act applications are posted on Maine DEP's website at <https://www.maine.gov/dep/land/projects/necec/index.html>. You can contact DEP through the project email NECEC.DEP@maine.gov if you have questions regarding the applications.

A petition to intervene must be made under oath or affirmation. Chapter 5, section 5.13(1). Having your petition notarized would satisfy this requirement. The deadline to file is August 2, 2018 at 5:00 PM.

Regards,

Bill Hinkel
Regional Supervisor
Land Use Planning Commission
Department of Agriculture, Conservation and Forestry
Mobile: 207-446-8823
Web: <http://www.maine.gov/dacf/lupc/index.shtml>

From: Mike Novello [<mailto:mnovello@wagnerforest.com>]
Sent: Friday, July 27, 2018 3:14 PM
To: Hinkel, Bill <Bill.Hinkel@maine.gov>
Subject: New England Clean Energy Connect Intervention

Good afternoon, Mr. Hinkel.

I work for Wagner Forest Management, which manages substantial parcels of land that border the proposed route for the NECEC project (for example, we manage a substantial portion of the land bordering the right of way in the Forks Plt, and also manage a portion of the land in the P-RR subdistrict associated with Beattie Pond). While we currently have no position for or against the project, we would like to seek intervenor status to ensure that our rights and interests are represented in the proceedings, as well as to ensure timely access to updated information. Is there a form or other guidance that we should follow to formally petition to intervene?

Also, I can only find application sections 1 and 25 online at the moment - do you anticipate that the rest of the application will be digitized in the future? If not, how can we access the full application?

Thank you for your help,
Mike

Mike Novello
150 Orford Road, PO Box 160
Lyme, NH 03768
Direct: (603) 208-2003
Cell: (603) 667-0775

RECEIVED

AUG 02 2018

LUPC - AUGUSTA



July 30, 2018

Jim Beyer
Bureau of Land Resources
Maine Department of Environmental Protection
106 Hogan Road, Suite 6
Bangor, ME 04401

RE: Petition to intervene in Central Maine Power Company's New England Clean Energy Connect Project

Dear Mr. Beyer,

Wagner Forest Management, Ltd. (Wagner) respectfully petitions to intervene as a party in Central Maine Power's (CMP's) application for a Site Location of Development Act permit and a Natural Resources Protection Act permit for construction of the New England Clean Energy Connect (NECEC) project.

Wagner has a direct and substantial interest that may be affected by this proceeding.

Wagner manages tens of thousands of acres of forested lands abutting or in close proximity to the proposed route of NECEC. Most notably, Wagner manages land for Bayroot LLC in The Forks Plt and East Moxie. On these parcels approximately 6.5 linear miles will be directly adjacent to the proposed route. Much of the NECEC project in this area divides our holdings, so that our land surrounds the proposed corridor on both sides. Wagner also manages for Bayroot LLC a portion of the land in the P-RR subdistrict associated with Beattie Pond. In addition to the obvious potential direct impacts from construction and operation activities, we are equally concerned that activities resulting from attempts to access the project through lands and roads we manage may have impacts that would not be adequately considered without our direct participation as an intervenor.

Wagner has been involved with several proposed commercial scale renewable energy projects in Somerset County. By its size and location, NECEC may have a material impact on current and future clean energy developments.

Wagner has specific contentions regarding the subject matter of the hearing.

Based on the limited information currently available, Wagner believes there are important issues that may arise during the proceedings and our discovery that would have material significance to the lands we manage. Based on the specific nature of our contentions, we do not believe our interests could be adequately addressed solely through other participants.

RECEIVED
AUG 02 2018
LUPC - AUGUSTA



Wagner is prepared and capable of participation.

Wagner is a knowledgeable organization, reasonably familiar with DEP permits of the type being sought by this application. We are capable of participating in an orderly and expeditious fashion, and will, as necessary, participate in pre-hearing conferences and public hearings, offer prefiled testimony, and present witnesses at hearings to support our contentions.

Wagner requests to receive all filings made in this proceeding. Please include the following contact on the official service list in this proceeding, and direct all communications concerning this petition or subsequent participation to:

Mike Novello
Wagner Forest Management, Ltd.
150 Orford Rd, PO Box 160
Lyme, NH 03768
(603) 795-2002
mnovello@wagnerforest.com

Because Wagner has a direct and substantial interest in this proposal, has specific contentions regarding the subject matter, and is prepared and capable of orderly participation, we have satisfied the requirements for intervention and our petition for intervenor status should be granted.

Respectfully submitted,

Michael Novello

On this 30 day of July 2018, before me, the undersigned notary public, personally appeared Michael Novello proved to me through satisfactory evidence of personal knowledge of identity, to be the person who signed the preceding or attached document in my presence, and who swore or affirmed to me that the contents of the document are truthful and accurate to the best of his/her knowledge or belief.

Victoria Maurer

_____, Notary Public

My Commission Expires: _____

VICTORIA MAURER, Notary Public
My Commission Expires March 13, 2020

RECEIVED

AUG 02 2018

LUPC - AUGUSTA

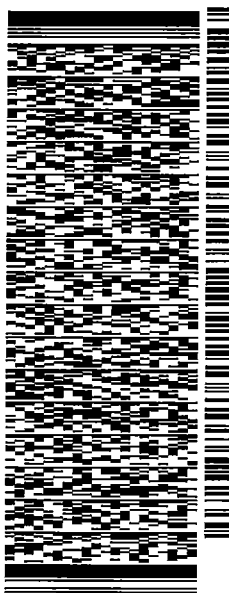
ORIGIN ID: HEBA (603) 795-2002
MIKE NOVELLO
MANAGER FOREST MANAGEMENT
150 ORFORD ROAD
LYME, NH 03768
UNITED STATES US

SHIP DATE: 01 AUG 18
ACT WGT: 1.00 LB
CAD: 102956948/NET 4040
BILL SENDER

TO **BILL HINKEL**
MAINE LAND USE PLANNING COMMISSION
22 STATE HOUR STATION

AUGUSTA ME 04333
REF: (207) 287-2631
INV: PO: DEPT:

552J18309/DCA5

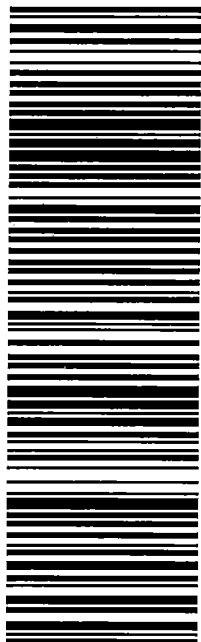


TRK# 7728 6994 0012
0201

THU - 02 AUG 10:30A
PRIORITY OVERNIGHT

XH AUGA

ME-US **04333**
PWM



After printing this label:

1. Use the 'Print' button on this page to print your label to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

Warning: Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.

Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com. FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$1,000, e.g. jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits, see current FedEx Service Guide.

Hinkel, Bill

From: Matt Wagner <mwagner@insourcerenewables.com>
Sent: Thursday, August 02, 2018 4:43 PM
To: Hinkel, Bill; caitlin.hutt2@gmail.com
Subject: Re Petition to intervene
Attachments: wagner LUPC.docx

Bill,

Please accept my letter attached below.

Sincerely,

Matt Wagner

Insource Renewables

113 North Lancey St

Pittsfield, ME 04967

(207) 659-1054
extension # 706

mwagner@insourcerenewables.com



Dear Maine Land Use Planning Commission,

Please find this written letter of intent to intervene regarding the Avon Grid's effort to permit the New England Clean Energy Connect transmission line construction.

My name is Matt Wagner and I'm writing on behalf of myself, my wife, and my children in the interest of our common future. I'm opposed to the clearing and construction of the proposed line for several reasons, which I will list below. As a family we have spent over twenty years hiking, biking, fishing, hunting, caving, rafting, and guiding in the Enchanted Forest and surrounding area. While we no longer live in the area, we now own a camp there and bring our children there at least every other weekend throughout the year. This is the area I consider my home. As former residents and guides we've lived on both sides of the recreation industry we now support. Please carefully consider the dramatic reshaping of this critical area's future in your permitting process. Thanks for taking a moment to consider my objections as you decide the future of the area.

- In public presentations CMP has repeatedly perpetuated the notion that the area where a new corridor is to be built is a degraded or otherwise previously destroyed industrial forest. While industrial forestry has certainly left its mark, it HAS NOT permanently fragmented one of the last remaining contiguous forests east of the Mississippi River, which is exactly what this project would do. Logging roads that were once 40 feet wide have receded back into barely passable jeep trails in my lifetime. Allowing a transmission line through this area is a massive shift towards an industrial landscape, not the working forest that we've long since come to terms with.
- As a lifelong outdoorsperson and conservationist, I can attest to some of the great work that's already been done by conservation organizations to protect this area. The MBPL lands on the southern slope of Coburn Mountain go largely unvisited but are an amazing unsung asset to the region. The Cold Stream conservation area attracts fisherman from all over the world as one of the greatest brook trout habitats in New England and is known to be the spawning ground for many of the brook trout in the Upper Kennebec River. The Nature Conservancy's protection of the land surrounding and including #5 Mountain is without parallel. NECEC threatens all these places with permanent development, habitat fragmentation, watershed loss, and insufficient setbacks from streams that harbor some of the country's last remaining brook trout fisheries.
- There are alternatives. This line doesn't need to transect this area. This project has been selected to save non-Maine ratepayers money over more viable and less ecologically menacing options. In a recent public hearing CMP's own representative admitted that this line may only be economically feasible for 20-40 years as non-transmission alternatives such as solar gain ground.
- No economic impact study has been done to show the potential impact on this area though a soft package has been offered by CMP to some of the rafting companies through a private arrangement that promises around 20 million in mitigation revenues to be paid to the supporters of the project. I'm certain the French would give us our 15 million back for the Louisiana Purchase in a heartbeat. The shortsightedness of this arrangement is staggering.

- As an aside from the soon to be realized economic costs and ecological concerns, I have a very human concern that's at the heart of why this project should suffer a quick rebuke. It's intangible, and I'll share it with you with an anecdote. I once took a young group of Boy Scouts from southern New England down the Kennebec on a raft trip. It's a day that I know changed their lives and how they view the natural world forever. During our trip, a bald eagle was attempting to rob the young from an osprey nest that hung over the river, not far from the proposed NECEC crossing. I pulled the boat to shore and we watched for nearly an hour as the osprey and eagle battled, diving, soaring, striking each other, and screeching loudly as they wheeled around us. Later that night the scout master told me that many of the kids in other boats that day had had a blast on the river, but that the kids that had gotten to see the great birds battling had been given something much greater and that they were quieter that night as they thought about their day. I hope some of them still carry that experience with them. Their experience that day couldn't have been had by lifelong effort. I'm certain that while many of them may not come back to experience the wildness of the area, that the idea of it, that knowing that wild places still exist, and that they can go there and leave the entanglements of modern life behind, is as critical to them today as it is to those of us who venture there regularly. There aren't many of these places left that are accessible to regular people on the east coast. A day on the river for many is a chance to re-find that bond with wildness. It doesn't matter that beyond the buffer lays a working forest that they can't see.

A lot of great work has been done to protect this experience, whether it's at the top of Enchanted Mountain, riding a raft on the Kennebec Gorge, or casting a fly to a rising trout on Cold Stream. I urge you on behalf of all who find rejuvenation in wildness to deny the application to bisect this wild and scenic area with a transmission corridor.

Kind Regards,

Matt Wagner
Knox, ME

Hinkel, Bill

From: jmwld@aol.com
Sent: Thursday, August 02, 2018 10:11 AM
To: Hinkel, Bill
Subject: CMP Powerline

Good morning

I am writing in opposition to the proposed CMP Power line to Massachusetts through unspoiled Maine territories west and south of the Moosehead Lake Region on Coburn Mountain and over the Kennebec River.

I believe that the power line would have huge adverse impacts on the region west and south of the Moosehead Lake region. Crossing the Kennebec Gorge is a crime.

I have been in the outdoor recreation business for 49 years in the region. I have been licensed whitewater rafting and master guide since 1980. It is a sin to put a power line across this pristine treasure (The Kennebec River Gorge)

Massachusetts should generate their own power.

With all of the land between Maine and Massachusetts I am sure there could be a better place for an extension cord to Massachusetts if it is found to be a necessity.

John Willard
The Birches
PO box 81
Rockwood , Maine 04478

207-400-9091

RECEIVED
AUG 13 2018
LUPC - AUGUSTA

Maine Land Use Planning Commission
Chairman Everett Worcester
18 Elkins Lane
22 State House Station
Augusta, Maine 04333-0022

John and Nancy Nicholas
208 Gayton Lane
Winthrop, Maine 04364

Date: August 8, 2018

Case: Opposition to Central Maine Power Company's proposed 145-mile Quebec Hydro transmission line in the State of Maine.

Dear Chairman Worcester:

We own real property in Upper Enchanted Township, Maine, approximately two miles from CMP's proposed 145-mile Quebec Hydro transmission line in the State of Maine. We bought our property to enjoy the heavily forested beauty, remoteness and silence of the north Maine woods in Upper Enchanted Township, Maine, and to experience the abundance of unique wildlife (moose, bear and deer) and native fisheries (wild and native brook trout. The proposed CMP transmission line would forever destroy that enjoyment. Consequently, we are fervently opposed to the CMP transmission line for the following reasons:

1. CMP proposes a 25-foot buffer for the transmission line from any lake, pond, stream, brook or wetland in violation of Maine's Mandatory Shoreland Zoning Act, which requires a buffer, or setback, of at least 100 feet from the high-water mark of any lake, pond, stream, brook or wetland. The proposed 25-foot buffer would cause irreparable harm to Maine's cherished wild and native brook trout, which are abundantly dispersed around the proposed transmission line in that part of the Unorganized Territory of Maine.
2. The proposed transmission line would result in a clear-cut of approximately 1,100 acres in the Unorganized Territory, which violates Maine Forest Service, Chapter 20 standards, Forest Regeneration & Clearcutting issued pursuant to MRSA Title 12, section 8869, subsection 2, Performance standards for clear-cuts, in which a clear-cut cannot exceed 250 acres.
3. The proposed transmission line would traverse Colburn and Johnson Mountains (Colburn Mountain is the highest mountain peak in the Jackman, Maine area) despoiling forever two picturesque mountain peaks and creating a hideous eyesore easily visible for miles on Route 201 for Maine residents and tourists.
4. The proposed transmission line appears to traverse at least two additional storied mountain peaks (this cannot be precisely determined, as the proposed transmission line has not been superimposed on a topographical map), Number 6 and Number 5 mountains.
5. The proposed transmission line appears to traverse Maine Public Reserved Land at mile 8 on the Spencer Road and near the Kennebec Gorge. If this is correct, the proposed transmission line land transfer, or acquisition, would be in violation of Article IX, section 23 of the Maine Constitution that requires a 2/3 vote of both houses of the Maine Legislature to alter or convey Maine Public Reserved Land.

RECEIVED

AUG 13 2018

UJPC - AUGUSTA

6. The proposed transmission line will not provide Unorganized Territory property tax benefits for owners of real property in the affected area. Any marginal property tax benefit would be shared by property owners in the entire Unorganized Territory, who vastly outnumber those directly impacted by the proposed transmission line. Also, the hundreds of property owners in the affected area would seek tax abatements from the Maine Department of Audit for the loss of property value from the proposed transmission line, offsetting any marginal property tax reduction.
7. The project will not reduce carbon emissions as claimed by CMP, as the energy coming through the proposed transmission line would come from existing Quebec Hydro resources, thus, displacing current hydro users in New York, Quebec and Ontario. The latter displaced hydro energy users would be compelled to replace that energy source with carbon-based sources – oil, coal and natural gas.
8. The project will not result in any long-term increase in employment in the State of Maine, only short-term employment from the construction of the proposed transmission line. After construction of the proposed transmission line is complete, Maine would experience a loss of permanent, long-term employment through the decline of other Maine-based energy producing sources.
9. It is highly speculative, and clearly erroneous, for CMP to claim that the proposed transmission line would reduce electric rates for Maine residents. Since Maine's electric power emanates from the New England Energy Pool, there are multiple and complicated factors that may impact electric rates in the future among the New England states including, as examples, residential growth, changes in the makeup of commercial energy users and changes in the mix of energy sources.

Thank you for the opportunity to submit this letter in opposition to the Central Maine Power Company's proposed 145-mile Quebec Hydro transmission line in the State of Maine. We can be reached at jrnicholas@roadrunner.com, 207-377-6352 and 207-462-4049.

Sincerely,



John and Nancy Nicholas