

**STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

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) in support of Central Maine Power Company's (CMP) NECEC Project and 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* DEP Regs. Ch. 3, § 11(A). Pursuant to the applicable regulations governing the conduct of licensing hearings, a petition to intervene shall be granted if it demonstrates that the petitioner is or may be, or is a member of a class which is or may be, substantially and directly affected by the proceeding. *See* DEP Regs. Ch. 3, § 11(A)(1). As discussed below, IBEW meets this criterion, and the Presiding Officer therefore should grant this petition.

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

IBEW has a direct and substantial interest that will be affected by these proceedings. The IBEW is a labor organization representing more than 1800 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. NECEC 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 facility, the IBEW does not believe that any other party to this proceeding can adequately represent its interests.

II. IBEW has specific contentions regarding the subject matter of the hearing and the appropriate statutory 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 unreasonable interference with existing scenic, aesthetic, recreational or navigation uses (*see* 38 M.R.S. § 480-D(1); DEP Regs. Ch. 315)
- No reasonable alternative exists (*see* DEP Regs. Ch. 310)
- No adverse effect on the natural environment (*see* 38 M.R.S. § 484(3); DEP Regs. Ch. 375)
- Adequate buffering (*see* DEP Regs. Ch. 375(9))

Based on the foregoing, IBEW seeks to intervene to raise specific contentions about the facts presented in CMP's applications and compliance with the applicable statutory and regulatory criteria.

III. IBEW is prepared and capable of participation.

Finally, IBEW is prepared and capable of participation in the hearing in a manner that will support its contentions about the Project. IBEW will be represented by Tim Burgess other IBEW representatives, and by legal counsel (to be determined). As the state's largest electrical labor organization, IBEW is fully capable and experienced in such proceedings, and will be efficient in the presentation of its arguments.

IBEW will address compliance of the applications with applicable statutory and regulatory standards, including those discussed above. 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 IBEW presents detailed, technical information about the proposed Project. We will attend pre-hearing conferences and the public hearing. Therefore, IBEW is both prepared and capable of participating in this proceeding and supporting the contentions discussed above.


IV. Conclusion

Based on the foregoing, 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: July 19, 2018



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