

**STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

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

Pursuant to the Department's August 13, 2018 First Procedural Order, the International Brotherhood of Electrical Workers (IBEW) hereby submits its statement of support, list of issues it will address, and statement on consolidation of intervenors. *See* First Procedural Order at ¶¶ 19-20.

**I. The International Brotherhood of Electrical Workers Supports the NECEC:**

The IBEW has intervened in support of the NECEC on behalf of our 1,800 employees in the state of Maine. This project will create almost as many jobs per year during permitting and construction as we have members who work in Maine. Lives are changed one job at a time. NECEC will have a profoundly positive impact on families throughout Maine, at no cost to ratepayers or taxpayers.

**II. Statutory and regulatory criteria and specific, significant or contentious topics or subject matters relating to the project which the IBEW will address:**

1. No unreasonable interference with existing scenic, aesthetic, recreational or navigation uses (*see* 38 M.R.S. § 480-D(1); DEP Regs. Ch. 315)

IBEW has been part of Maine's clean energy economy for the past several decades. Our members have helped build solar and windfarms, and before that, the hydro facilities that once formed the backbone of Maine's electrical system. Our members recreate all over the state of Maine, hunting, hiking, snowmobiling and all other manner of pursuits. We value Maine's recreation and scenic resources, and are confident that a new transmission line, located primarily in an existing corridor will not impact natural resources. The portion of the line in new corridor is ideally sited where commercial forestry dominates a working landscape, and recreational uses are few. In our testimony, we intend to also address the issue of trade-offs. Realistically, no energy source is free of impacts so bringing clean energy from Quebec where it is needed in New England is a net benefit to Maine.

2. No reasonable alternative exists (*see* DEP Regs. Ch. 310)

There is no better route in Maine or elsewhere for a transmission line from Quebec. The location of the Kennebec River crossing is below the actual gorge and will have minimal if any impact on rafting customers. There is no other crossing location that would be feasible and could be accomplished in the time frame required. Crossing the river at Harris Dam poses numerous problems, including reopening the FERC license which could take years to resolve, if Brookfield would even entertain that option. It would require miles of additional transmission line and additional expense. An underground crossing would have a far greater impact on the environment, given the drilling and possible blasting involved, plus facilities on both sides of the river, none of which would be required with an overhead crossing.

3. No adverse effect on the natural environment (*see* 38 M.R.S. § 484(3); DEP Regs. Ch. 375)

IBEW works on all manner of projects large and small. The effects of this project on the natural environment are minor and mitigated especially given the environmental benefits it provides in terms of greenhouse gas reductions.

4. No impact on the preservation of unusual natural areas (*see* DEP Regs. Ch. 375(12))

The Project will not affect unusual natural areas. The Kennebec River crossing is not in the actual gorge, but rather downriver where the river widens and slows. In carefully siting this corridor, CMP has ensured the preservation of natural areas.

IBEW welcomes the economic opportunity for our members and for the towns along the corridor. Not all projects warrant support, but the NECEC has minimal impacts and enormous benefits for Maine. We stand behind it and look forward to presenting testimony at the hearing.

### **III. Statement on Consolidation:**

IBEW is willing to be consolidated with Intervenors in support of NECEC.

August 27, 2018



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