

STATE OF MAINE  
CUMBERLAND, ss

SUPERIOR COURT  
CIVIL ACTION  
DOCKET NO. \_\_\_\_\_

<p>NECEC TRANSMISSION, LLC,</p> <p style="text-align: center;">and</p> <p>AVANGRID NETWORKS, INC.,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>BUREAU OF PARKS AND LANDS, MAINE DEPARTMENT OF AGRICULTURE, CONSERVATION AND FORESTRY,</p> <p>MAINE PUBLIC UTILITIES COMMISSION,</p> <p>MAINE SENATE,</p> <p>and</p> <p>MAINE HOUSE OF REPRESENTATIVES,</p> <p style="text-align: center;">Defendants.</p>
---

**AFFIDAVIT OF THORN C.  
DICKINSON IN SUPPORT OF  
PLAINTIFFS’ MOTION FOR  
PRELIMINARY INJUNCTION**

I, Thorn C. Dickinson, being over the age of 18 years and duly sworn, state as follows:

1. I am the President and CEO of NECEC Transmission LLC (“NECEC LLC”). In my position, I oversee the planning, scheduling, permitting, and construction of the New England Clean Energy Connect transmission project (the “NECEC Project” or “Project”).
2. Avangrid Networks, Inc. (“Avangrid”) wholly owns NECEC LLC.
3. I provide this affidavit in support of NECEC LLC and Avangrid’s Motion for Preliminary Injunction.

of their payment obligations related to these additional benefits so that payments would start during the construction phase of the Project as opposed to after commercial operation. As of October 1, 2021, NECEC LLC and HQUS have made payments of about \$18 million to the different NECEC benefits funds. Suspension of construction of the Project due to the Initiative may lead to the suspension of the benefit funds payments in accordance with the terms of the NECEC II Stipulation and the Support Agreement. Similarly, if the Project is terminated prior to commercial operation, all future payments to the NECEC benefits funds would terminate, thereby denying the State of Maine and its residents these benefits.

34. A suspension of construction of the Project that risks its continued viability would also jeopardize several other Project benefits, including the following:


a. *Fiber Optic Infrastructure.* Pursuant to the NECEC I Stipulation, NECEC LLC has committed that the final design for the NECEC transmission lines will include the necessary facilities and equipment to provide additional fiber optic capacity on, among other, the DC transmission line for the benefit of the State of Maine and to construct the necessary fiber optic infrastructure to provide access to this fiber optic capacity at major road crossings or other appropriate access points along the NECEC Project route. The suspension of the NECEC Project will, at a minimum, delay the implementation of these fiber optic commitments that are intended to benefit communities along the Project route and, if the Project is terminated, the benefits of additional fiber optic capacity to the host communities would be lost.

b. *Conservation of 40,000 Acres of Land.* Pursuant to the DEP Order, NECEC LLC must permanently conserve 40,000 acres of land in the vicinity of Segment 1 of the Project to promote habitat connectivity and conservation of mature forest areas. If the

Project is cancelled because it cannot be timely constructed, the conservation of this very significant area of land would not be realized.

I, Thorn C. Dickinson, as the authorized agent of NECEC Transmission LLC, declare under penalty of perjury that the factual allegations of the foregoing Complaint are true and correct, based on my personal knowledge, except where alleged on information and belief in which case I believe them to be true. Such personal knowledge includes information from records of the regularly conducted activities of Avangrid Networks, Inc., NECEC Transmission LLC, and Central Maine Power Co., made at or near the time of such activities, by or from information transmitted by persons with knowledge, kept in the regular course of such activities, and of which it is the regular practice of Avangrid Networks, NECEC LLC, and CMP to make such records.

Dated this 3rd day of November, 2021


  
\_\_\_\_\_  
Thorn C. Dickinson

STATE OF MAINE  
CUMBERLAND, ss

Personally appeared before me the above-named Thorn C. Dickinson, as the duly authorized representative of NECEC Transmission LLC, and made oath that the statements made and verified by him herein are true.

Before me,

Dated: November 3, 2021

  
\_\_\_\_\_  
Notary Public  
My Commission Expires:

**HEATHER JAYNE STEVENS**  
**NOTARY PUBLIC - State of Maine**  
**My Commission Expires**  
**October 25, 2023**