

## **Petition for a Public Hearing**

Natural Resources Council of Maine, Conservation Law Foundation, and Appalachian Mountain Club

*November 2, 2017*

Regarding Central Maine Power's Site Location of Development, Natural Resources Protection Act and Water Quality Certification Applications to Construct the **New England Clean Energy Connect Transmission Project**

In accordance with Chapter 2, Section 7 of Department of Environmental Protection (Department) rules, the Natural Resources Council of Maine (NRCM), Conservation Law Foundation (CLF) and Appalachian Mountain Club (AMC) (together "Petitioners") hereby petition for a public hearing to be held regarding Central Maine Power's (CMP) Site Location of Development, Natural Resources Protection Act and Water Quality Certification applications to construct the New England Clean Energy Connect (NECEC) transmission project.

The NECEC project consists of an electric transmission line from the border with Quebec, Canada in Beattie Township, Maine to a new converter station in Lewiston, Maine. Approximately 40 miles of the 147-mile transmission line would be built in a new, undeveloped corridor partially owned by CMP in western Somerset and Franklin counties. The remainder would be built in largely undeveloped areas within CMP's existing transmission corridor.

The location of the transmission project, including but not limited to the 40 miles of new corridor, in a remote, largely undeveloped area of the state raises many important issues that the Department will need to examine. As a single example, the proposed transmission route crosses at least six parcels of conserved land, each with unique purposes and uses.

The Petitioners and our members have significant information about the conservation, scenic, recreational and wetland resources that may be impacted by this project—information that is likely very different from information possessed by CMP. CMP is a transmission and distribution utility whose primary function is to operate the 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 this part of the state.

Petitioners believe a public hearing will provide the Department with important opportunities to establish the factual basis for its licensing decision.

As stated in CMP's application, this project is unusual because it is proposed in response to a Request for Proposals for renewable energy by Massachusetts. The winning bids are to be

selected by January 25, 2018. We therefore request that the Department schedule a hearing after this date, as the outcome of the RFP could have an important impact on the nature of the proceeding. Petitioners would consider withdrawing its request for a hearing after learning the results of the RFP, and delaying a public hearing *could* avoid the unnecessary allocation of resources by the Department, applicant and other parties.

We recognize that the statutory deadline for a Department decision is in late March 2018. However the Department should be aware that in its application to the Maine Public Utilities Commission (MPUC) for a Certificate of Public Convenience and Necessity (CPCN) for this project, CMP waived MPUC's statutory review period. Of course, CMP has a separate right to retain or waive the Department's review period, but in its application to the MPUC, CMP stated that a final decision "within a year from the date of the [application] submission" would "allow sufficient time for CMP to construct the NECE Transmission Project." *CMP Request for CPCN for the NECES, Volume I, page 14*. In response the MPUC has scheduled a proceeding that includes a public hearing in July and final decision in September 2018.

Respectfully,



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