

**STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

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 of Commerce
#L-27625-2C-C-N, #L-27625-VP-D-N,)	In Support of New England Clean
and #L-27625-IW-E-N)	Energy Connect
)	
)	

Now comes the Maine State Chamber of Commerce (Maine State 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* 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). The Maine State Chamber meets this criterion, as discussed below, and the Presiding Officer therefore should grant this petition.

I. The Maine State Chamber, and its membership, will be substantially and directly affected by the 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 stands by CMP's financial capacity and technical ability.

CMP is Maine's largest energy delivery company and serves more than 600,000 customers over 11,000 square miles. It invests regularly in a stronger, smarter grid, which means its customers enjoy a high level of service, and its commitment to providing safe, reliable power is well known. CMP has strong financial backing from its U.S.-based parent company, Avangrid, Inc., with \$31 billion in assets and operations in over 27 states. And the worldwide leader in the energy industry, Iberdrola, is the primary shareholder of Avangrid.

When CMP developed its largest project ever – the Maine Power Reliability Project – it did so in such a way that the public, the regulatory agencies, the Legislature, and the host communities were all very satisfied. CMP has earned the high regard of its customers and the State. It knows how to permit and develop projects on time, under budget, and with broad public support.

III. The Maine State Chamber has specific contentions regarding the subject matter of the hearing and the appropriate statutory 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. The Chamber's contentions include, but are not limited to, the following:

- No concerns over financial capacity or technical ability (*see* 38 M.R.S. § 484(1); DEP Regs. Ch. 373(2)(A)-(B), (3)(A)-(B))
- 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)

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

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

IV. Maine State Chamber is prepared and capable of participation.

Finally, the Maine State Chamber is prepared and capable of participation in the hearing in a manner that will support its contentions about the Project. The Maine State Chamber will be represented by President Dana Connors and by legal counsel (to be determined). As the state's most influential business advocate, the Maine State Chamber is fully capable and experienced in such proceedings, and will be efficient in the presentation of its arguments.

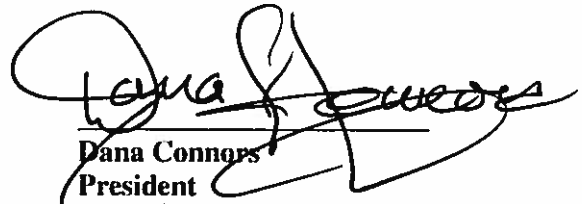
The Maine State Chamber will address compliance of the applications with applicable statutory and regulatory standards, including those discussed above. Depending on the format established for this hearing, our witnesses will file written reports and/or present testimony with an opportunity for questions and cross-examination.

These witnesses will ensure that 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.

V. 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: July 19, 2018



Dana Connors
President
Maine State Chamber of Commerce