

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Brookfield White-Pine Hydro LLC

Project No. 2322-069

MOTION TO INTERVENE BY THE CONSERVATION LAW FOUNDATION

Pursuant to 18 C.F.R. §385.210 and §385.214, the Conservation Law Foundation (“CLF”) hereby moves to intervene in the above-captioned proceeding issued by the Federal Energy Regulatory Commission (“Commission” or “FERC”), on July 1, 2020. The application was filed by Brookfield White-Pine Hydro LLC, a part of Brookfield Renewable (hereinafter “Brookfield”), which controls and operates several hydroelectric projects on the Kennebec River in Maine, which include the Lockwood Project FERC No. 2574, the Hydro-Kennebec Project FERC No. 2611, and the Weston Project FERC No. 2325, in addition to the subject Shawmut Project FERC No. 2322. CLF seeks to protest the hydroelectric application that has been filed with the Commission for the Shawmut Project FERC No. 2322-069. This motion to intervene is timely as CLF will be filing joint Comments on the Draft EA with the Kennebec Coalition and the Commission has not yet acted on the Final License Application.

Founded in 1966, CLF is a non-profit advocacy organization with 5,000 members across New England, including approximately 500 in Maine. CLF works to solve the environmental problems threatening the people, natural resources, and communities of New England. CLF’s advocates use law, economics and science to design and implement strategies that conserve natural resources, protect public health, and promote vital communities in our region. CLF has members in many of the communities that border the Kennebec River, including Waterville, Augusta, Skowhegan and Fairfield, the sites of these Projects.

For more than three decades, CLF has worked to restore habitat in New England’s

coastal rivers for important species such as herring, alewives, shad and salmon. CLF's work to restore key forage fish has stretched from the Connecticut River to the St. Croix River and is an integral part of our work to restore New England's coastal and ocean fisheries.

Members of CLF use the Kennebec River for recreational, educational, and aesthetic pursuits. CLF members fish, boat and otherwise enjoy the watershed in the vicinity of the Lockwood, Shawmut, Hydro- Kennebec, and Weston projects along the Kennebec. Further, CLF members have broad and deep organizational interests in the Commission's equal consideration of power and non-power values in hydropower licensing pursuant to Sections 4(e) and 10(a) of the Federal Power Act ("FPA").

CLF is engaged on Kennebec River fisheries and dam issues in collaboration with the Kennebec Coalition, a group of organizations who themselves have been working for more than a quarter of a century to restore Atlantic salmon and other native sea-run fish in the Kennebec River Watershed. This collaboration will result in the joint filing by the Kennebec Coalition and the CLF of Protests and Comments in opposition to the Draft Environmental Assessment for the Shawmut Project's Hydropower License

This history fully demonstrates CLF's and its members' direct and substantial interest in the outcome of the hydroelectric application that has been filed with the Commission for the Shawmut Project FERC No. 2322-069.

For the foregoing reasons, Conservation Law Foundation should be permitted to intervene with full rights in this proceeding.

Service of process and other communications in this matter should be addressed to:

Sean Mahoney
Conservation Law Foundation
53 Exchange St, Suite 200
Portland, ME 4101
(207) 210-6439
smahoney@clf.org

Respectfully submitted,

A handwritten signature in blue ink that reads "Sean Mahoney". The signature is written in a cursive style with a large initial "S" and "M".

Sean Mahoney, Esq.
Executive Vice President
Director, CLF Maine

Dated: August 13, 2021