

November 10, 2025

VIA EMAIL

Melanie Loyzim, Commissioner
Dawn Hallowell, Land Bureau
Maine Department of Environmental Protection
17 State House Station
Augusta, Maine 04333
Via email to: necec.dep@maine.gov

**Re: NECEC Transmission, LLC Condition Compliance
L-027625-0003 (approval)
Comments of the Industrial Energy Consumers Group**

Dear Commissioner Loyzim and Ms. Hallowell:

On behalf of the Industrial Energy Consumer Group (IECG), we are writing to urge approval of the Department's November 4, 2025 draft Order of Condition Compliance for Special Condition #39 for the New England Clean Energy Connect (NECEC) Conservation Plan. This is consistent with the IECG comments on the Plan submitted to the DEP on June 13, 2025.

IECG has long advocated for energy policies that ensure affordable, reliable, and increasingly clean electricity for Maine's industrial consumers. Our support for the NECEC transmission line stems from its unique ability to deliver substantial baseload hydropower from Quebec into the New England grid. This clean, firm power source is essential for maintaining grid reliability and price stability in the region.

The Conservation Plan presents an impressive, coordinated effort between the State, the applicant, and other interested entities over a number of months of efforts. The Bureau of Public Lands, who has been very involved in shaping the Plan, filed on October 27th with the DEP its formal approval of the forest management plan. The revised Plan fully meets and complies with the Special Condition and Permit goals, with the following key features:

- It involves a fantastic location connecting to over 400,000 acres of adjacent conserved lands;
- It does not allow the property to ever be subdivided, which is unlike some other large conservation easements, such as the Moosehead Easement;
- It has a low cap on plantations (artificially regenerated trees), again unlike some other large conservation easements previously approved in Maine;
- It contains a total acreage cap, in perpetuity, on gravel pits, which is unique as to other large conservation easements;

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- Originally the DEP ordered 40,000 acres of conservation, and the current Plan is 50,000 acres;
- The original plan had included 50-ft trees at 60 basal area (density); the current Plan has been revised to require 80 basal area (a higher standard); and
- Last and not least, the DEP conditions at page 20 of the November 4th draft condition compliance order provide sufficient additional protections with:
 - Stronger requirements around stream crossings – they must be built to better protect stream banks and wildlife;
 - Clear prohibition on new utility and access easements; and
 - Clear prohibition on new leases and licenses on the property (with limited exceptions for short term leases and sugar bushes).

In conclusion, IECG and its members therefore respectfully urge the Department to approve the Condition Compliance Order as to the Conservation Plan, because it is consistent with the requirements of the governing Permits and Orders. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey Thaler". The signature is written in a cursive, flowing style.

Anthony Buxton, Esq.
Jeffrey Thaler, Esq.
Attorneys for IECG