

**STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

Central Maine Power Company Application  
for a Site Location and Development Act  
Permit and Natural Resources Protection Act  
Permit for the Construction of the New  
England Clean Energy Connect (NECEC)

**CONSERVATION LAW  
FOUNDATION'S PETITION  
TO INTERVENE**

July 19, 2018

Pursuant to Chapter 3, § 11(A) of the Department of Environmental Protection's (Department) rules, and the Notice of Opportunity to Intervene issued by the Department on June 27, 2018, Conservation Law Foundation (CLF) respectfully petitions the Department for leave to intervene as a party to the proceeding.

As the Department's Notice of Opportunity to Intervene indicates, the proceeding concerns Central Maine Power Company's (CMP) application for permits from the Department for CMP's proposed New England Clean Energy Connect (NECEC), an electric transmission line from the border with Quebec in Beattie Township to a new converter station in Lewiston, Maine. The project also consists of several upgrades to CMP's existing electrical transmission network. If approved, the NECEC will be capable of delivering up to 1,200 megawatts of renewable energy to the New England power grid.

CLF is a nonprofit environmental advocacy organization with offices and members in Maine and throughout New England. Through law, policy, and the marketplace, CLF advocates for clean energy solutions to benefit communities across the region.

CLF has intervened in cases before this Department, including the Department's proceedings concerning CMP's Maine Power Reliability Program (MPRP), the Calais Liquefied Natural Gas (LNG) project, and Champlain Wind's Bowers Wind Project.

CLF is actively participating as an intervenor in the Public Utility Commission's (Commission) proceeding concerning CMP's application for a Certificate of Public Convenience and Necessity for the NECEC. *See Central Maine Power Company Request for Approval of CPCN for the New England Clean Energy Connect Consisting of a 1,200 MW HVDC Transmission Line from Québec-Maine Border to Lewiston (NECEC) and Related Network Upgrades* (Docket No. 2017-00232). CLF has also intervened in other Commission proceedings concerning transmission proposals. *See, e.g., Central Maine Power Company and Public Service Company of New Hampshire Request for Certificate of Public Convenience and Necessity for the Maine Power Reliability Program Consisting of the Construction of Approximately 350 Miles of 345 kV and 115 kV Transmission Lines ("MPRP")* (Docket No. 2008-255).

CLF has also been actively involved in the development of the Massachusetts clean energy generation request for proposals (RFP) pursuant to Section 83D of Chapter 169 of the Acts of 2008, as amended by Chapter 188 of the Acts of 2016, which requires the solicitation of bids for 9,450,000 MWh of power from clean energy generation resources, and in response to which CMP has developed the NECEC project and submitted a bid to the RFP based on the NECEC project. In particular, CLF submitted comments to the Massachusetts Department of Energy Resources, the Massachusetts Office of Attorney General and the Massachusetts distribution companies in response to a solicitation for stakeholder input regarding the RFP, and CLF submitted comments to the Massachusetts Department of Public Utilities (DPU) in Docket No. 17-32 concerning the solicitation and execution of clean energy generation contracts under Section 83D. CLF will also be participating in the Massachusetts DPU proceeding concerning the proposed power purchase and transmission service contracts for the NECEC.

No other party adequately represents CLF's interest in this matter because of CLF's unique history with and perspective on transmission projects in Maine and the development and transmission of renewable energy resources throughout New England, and cross-cutting advocacy in proceedings before the Department and Commission that dovetail with this one and affect the energy grid in Maine.

If granted leave to intervene, CLF intends to participate in discovery hearings and negotiations, file briefs and comments, and otherwise participate fully as a party. Given its organizational purpose, CLF intends to make certain contentions concerning the potential environmental and climate change impacts of the NECEC.

CLF requests to receive all filings made in this proceeding, subject to the limitations of any protective orders issued. The following people should be included on the official service list in this proceeding and all communications concerning this petition should be addressed to:

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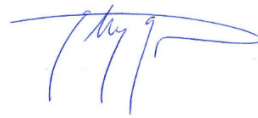
WHEREFORE, for all these reasons, CLF petitions the Department to permit CLF to intervene in the above-captioned proceeding.

Dated: July 19, 2018

Respectfully submitted,



Phelps Turner  
Conservation Law Foundation



Emily Green  
Conservation Law Foundation