STATE OF MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION

CENTRAL MAINE POWER COMPANY Application for Site Location of Development Act permit and Natural Resources Protection Act permit for the New England Clean Energy Connect ("NECEC") from Québec-Maine Border to Lewiston and Related Network Upgrades

NATURAL RESOURCES COUNCIL OF MAINE'S PETITION TO INTERVENE

July 19, 2018

No. L-27625-26-A-N

The Natural Resources Council of Maine (NRCM) hereby petitions the Maine Department of Environmental Protection to intervene as a party in Central Maine Power's (CMP's) application for a Site Location of Development Act permit and a Natural Resources Protection Act permit for the New England Clean Energy Connect (NECEC) high voltage direct current (HVDC) transmission line running from the Québec-Maine Border to Lewiston and related network upgrades. NRCM seeks leave to intervene pursuant to the Maine Administrative Procedure Act and the Rules and Regulations of the Department of Environmental Protection, Chapter 3, Section 11(A).

In support of this Petition, NRCM states the following:

1. NRCM is a not-for-profit tax-exempt corporation dedicated to the protection of Maine's environment and the wise use of the state's natural resources through a program of advocacy, legal defense, and education. NRCM has a membership and support base of 20,000 individuals and families who reside, own property, and recreate throughout the state of Maine.

2. NRCM has members and supporters who reside, own and operate businesses, and recreate in Somerset, Kennebec, Androscoggin, Lincoln, and Cumberland Counties.

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3. Since its establishment in 1959, NRCM has advocated for the protection of important natural resources and wise land use before Maine's administrative agencies, including the Department of Environmental Protection and Land Use Planning Commission.

4. NRCM also has a strong history of promoting Maine-grown clean renewable energy sources to achieve cleaner, healthier air and water for Maine and to make Maine less dependent on imported energy and advance our economy.

5. NRCM is currently an intervenor in the proceeding before the Maine Public Utilities Commission on CMP's application for a Certificate of Public Convenience and Necessity for the NECEC and plans to intervene in the proceeding before the Land Use Planning Commission on or before the August 2, 2018, deadline.

6. If granted leave to intervene, NRCM intends to participate fully as a party, including cross-examination of the applicant's witnesses at the hearing, submission of post-hearing statements and argument, and possible judicial appeals.

7. NRCM and its members and supporters will be "substantially and directly affected by the proceeding," given NRCM's and its members' and supporters' strong commitment to clean energy, responsible development, and the protection and wise use of Maine's North Woods.

For the above reasons, NRCM requests that this Petition for Intervention be granted.

Respectfully submitted,

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