

March 31, 2019

Re: CMP Corridor

Dear Mr. Hinkel and Mr. Beyer,

I am writing this letter so that I can be entered into the official record as an opponent to the proposed CMP Corridor (NECEC).

I have read the State of Maine PUC 'Examiner's Report' and I realized how utterly weighted this process actually has become. I questioned whether I should even send this letter, seeing it as a waste of my time considering what I see as a loaded deck and total lack of impartiality on the part of the State of Maine. However, in order to be able to look at myself in the mirror I decided to make my case, wondering if someone in the Mills' Administration might actually look at facts. So, here goes.

As stated, I read the State of Maine PUC 'Examiner's Report' and found it quite astounding in many respects, but one in particular. In this type of report where two sides provided legal authority to back up their particular arguments only one side was really considered and always had a decision made in their favor. There was an obvious bias toward CMP. More specifically, I will refer to the decision regarding the Maine Title 35-A where it seems that a Maine Statute is used to work for **other people** with little regard for people in Maine, who are actually governed by Title 35-A. Why is this? The Commission disagrees with the premise of every factor dealing with public need as long as there is a balance – benefits outweighing the costs. Throughout this entire document I do **not** find any reference to the cost of the environmental damage caused by clear cutting 3500 +/- acres, roughly 35,000 cords of logs and pulpwood, and does not mention the short and long-term costs of using herbicides on these corridors. The number of waterways crossed, wetlands and other seasonal streams that can carry herbicides is myriad. But, nothing is mentioned about this cost. Perhaps the Committee needs to re-read "Silent Spring" (Carson) and "A Stolen Future" (Colborn) to re-familiarize themselves with the huge costs to ecosystems (costs that extend to humans) and, which does not appear anywhere in the 'Examiner's Report'.

I was also struck with the fact that in the 162 pages of the 'Examiner's Report' with compelling arguments on both sides, there was **not** one time where the opposition was selected by the Examiners as having an argument that essentially 'won'. Each time the Examiners selected the proponents' side of the argument. With the 'actors' on the opponents' side the odds that **every** argument made by them would ultimately be rejected is difficult, if not impossible to believe. I would also like to comment here that one of the supporting parties for the proponents, Western Mountains & Rivers Corporation (WM&RC), is simply an arm of CMP, which means that they actually seem to have 2 votes. Everyone on the proponents' side seem to turn a blind eye to the fact that this NGO was created by CMP, funded by CMP, and

serves as a shell corporation for CMP. Doesn't this type of conflict send up very deep red flags? If not then I understand that your decision has been made for quite a while.

I would also argue with the comment on page 22 of the State of Maine PUC 'Examiner's Report' where it is stated that the public need is to deliver electricity from Hydro-Quebec to Massachusetts. Seriously, you accept this? So, the State of Maine has Title 35-A; a huge swath of land will be cut, cleared, widened, and contribute to serious environmental effects; only reduces ratepayers' bills by \$0.40/month; and the Examiner's Report eliminates the **people of Maine**???. Would you mind responding to this directly and tell me how Maine is eliminated from this 'equation'???. I would like to counter with the fact that because of this public need it is **absolutely necessary** to implement an independent assessment of the costs to the people of Maine. What the Examiner(s) has/have done is to remove Maine and its people from any reasonable and ethical pathway to protect them from any project that has the potential of doing significant damage, such as this one. And, please let me emphasize once again that while environmental costs are difficult to quantify, they can be calculated but have been completely left out of any assessment and discussion thus far.

I view on page 22 the point is made that there cannot be a lower-cost NTA alternative because Maine does not pay anything for the project. This is not correct on two points: (1) the **costs** of environmental damage; potential property devaluations; and negative effects on recreation and potential reduction of tourism business (to name three); and (2) apparently there is a possible alternative. Perhaps it is not entirely viable but many have spoken about a buried conduit that already exists that could be retrofitted to accommodate electrical transmission. Has this been brought up publicly by anyone? Probably not, but it exists and would therefore nullify the contention that an NTA alternative doesn't exist. Moreover, HQ transmits electricity to Massachusetts now – how would they do that? Perhaps the existing route could be expanded? Regardless, these two examples represent **an alternative**. I would submit that a study should be required to determine **whether** there may be a feasible alternative. If found, then the requirement for an independent assessment is triggered. In my opinion, no feasible alternative has been found because CMP does not want one to be found.

Page 26 contains a passage that states the Commission should not defer to DEP or LUPC and should make a decision itself. What is the expertise of the Commission members that enables them to make a decision about a project that has an impact on a number of different sectors, some of which are difficult to quantify? My opinion is that CMP will provide the justification and no other consideration will be tolerated. It is my sincere hope that this is not the case, but so far in this whole process nothing has changed my opinion. What I have seen with all of the information, including the State of Maine PUC 'Examiner's Report' is that a goal has already been established and now everyone is working backwards to build the justification that will bring about substantiation for approving this project. You do

understand that this is **not** the way to decide something of this importance, don't you?

Another argument commonly seen concerns climate change. Hydro power is not really clean. ([https://theyee.ca/News/2018/01/24/Megadams-Not-Clean-Green/?fbclid=IwAR1wx2x-T3y0aRe5EB43XNHeph4cH1\\_f\\_F-XqIh64IMxxaQ37G1XAjQol5s](https://theyee.ca/News/2018/01/24/Megadams-Not-Clean-Green/?fbclid=IwAR1wx2x-T3y0aRe5EB43XNHeph4cH1_f_F-XqIh64IMxxaQ37G1XAjQol5s)) (visited March 31, 2019) And this contradicts the CMP contention on page 27 of the Examiner's Report.

In addition, the 'guarantee' that HQ will provide continuous energy to Massachusetts is not really true: (<https://commonwealthmagazine.org/opinion/hydro-quebecs-greenwashing-game/>) (visited March 17, 2019).

Page 29 demonstrates that CMP and the Examiner's Report choose selectively how they want to use laws. In this case an argument reverses the treatment received by 35-A when the Examiner's Report states that incremental hydro-electric generation for import into the New England market supports "State [Maine] renewal energy generation goals". So, this time Maine is included but not for 35-A.

In summary, I believe that this proposal from CMP has been rife with 'insider' information and totally lacks objective assessment from an independent source. I have worked for USAID, Ford Foundation and most recently for IUCN as the director of the Forest Law Enforcement & Governance Program (FLEG). This was implemented in Armenia, Azerbaijan, Belarus, Georgia, Moldova, Russia, and Ukraine. I have worked in Maine for International Paper Company, had my own Consulting Forestry business and created a program at UMF for forest landowners. What I have seen so far in this proposal by CMP would likely not even happen in Belarus, which demonstrates how much influence is exerted by CMP in the State of Maine. I also have a very cynical attitude toward WM&RC. To have what appears to be a shell company of CMP and to have Peter Mills in this NGO sends up many red flags. The full role of this organization has likely not been revealed, but I can certainly state that the State of Maine Public Utilities Examiner's Report should expunge all mention of this organization because it has no place and is simply an arm of CMP, but is being presented as something else. I might ask, given this obvious ethical 'slip up' by CMP along with the questionable billing practices still being investigated how can any Commission of any type actually view the information provided by CMP with any confidence? I urge the Commission, the DEP and LUPC to reject the CMP proposal or at least take the ethical and practical step of requiring an independent assessment so that the people of Maine will be satisfied that their State and their voice has actually been heard. There is a huge majority in Maine against the CMP Corridor. Why do you ignore this fact?

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