August 24, 2018

 **STATE OF MAINE**

**DEPARTMENT OF ENVIRONMENTAL PROTECTION**

IN THE MATTER OF

 ) Response of the City of

Central Maine Power Co. ) Lewiston in Support of NECEC

#L-27625-26-A-N, #L-27625-TG-B-N, ) and to First Procedural Order

#L-27625-2C-C-N, #L-27625-VP-D-N, )

and #L-27625-IW-E-N )

 )

STATEMENT OF SUPPORT FOR NECEC

The City of Lewiston has intervened in this proceeding in support of the application of Central Maine Power for the New England Clean Energy Connect project.

SPECIFICATION OF STATUTORY AND REGULATORY CRITERIA AND THE SPECIFIC, SIGNIFICANT OR CONTENTIOUS TOPICS OR SUBJECT MATTERS UNDER THOSE CRITERIA RELATING TO THE PROJECT THAT LEWISTON WISHES TO ADDRESS.

The City of Lewiston intends to raise specific contentions regarding the statutory and regulatory criteria that will apply to the project. These contentions include the following:

1. The project will have no adverse effect on the natural environment (*see* 38 M.R.S. § 484(3); DEP Regs. Ch. 375).

The vast majority of the project is located within or near existing, permitted utility corridors. As such, these installations will have limited to no impact. The new utility corridor leading to Maine’s border with Canada impacts a limited number of property owners, all of whom are engaged in large scale commercial forestry, and is the shortest of all identified paths between Quebec and the New England Energy grid. Currently, these properties are subject to frequent and extensive clearcutting activities which, in their totality, have a much more significant impact on the natural environment than will this project. In addition, Central Maine Power has taken care to locate the new corridor in such a manner as to avoid preserved lands and minimize environmental impact.

1. No unreasonable interference with existing scenic, aesthetic, recreational, or navigational uses (*see* 38 M.R.S. § 480-D(1); DEP Regs. Ch. 315)

Once again, the majority of the proposed project will be confined to existing utility right-of-way. CMP has taken care to locate the proposed new right-of-way in a manner to limit interference with scenic, aesthetic, recreational, or navigational uses. CMP has, for example, located this extension to limit its visibility from state highways, emphasizing 90 degree crossings. It has also carefully sited the proposed new line to avoid public and conservation lands and, wherever possible, wetlands and other critical habitats. CMP, working with area stakeholders, has taken great pains to identify the most appropriate crossing of the Kennebec River to limit impact on scenic and recreational uses of the river. The Appalachian Trail currently crosses the existing utility corridor at three points. This impact already exists and will not be expanded.

As noted above, the new section of the transmission line will be constructed over working forests with significant and extensive areas of clear cuts. As such, the utility corridor will have minimal additional impact beyond that of the commercial forestry activities in the area.

1. Adequate buffering (*see* DEP Regs. Ch. 375(9)).

CMP has taken pains to locate the new utility corridor in such a way as to minimize impacts on water bodies and preserved lands in accordance with all requirements. CMP also has significant experience in the maintenance and preservation of such buffering throughout its existing system.

1. No Reasonable Alternative Exists (*see* DEP Regs. Ch. 310)

The City of Lewiston partnered and worked cooperatively with CMP on the Maine Power Reliability Project, a significant investment in the capability and reliability of Maine’s transmission network. As a result of that project, the City of Lewiston is now a major node in the New England Power Grid due to installations such as the Larabee Road station. Lewiston is the best location in Maine and New England into which power from Quebec can be routed for distribution throughout the state and region. The MPRP investments in Lewiston have been made, are in place, and should be utilized to ensure our region’s energy future. The importance of Lewiston as a key distribution node is underscored by the reality that significant generating resources in Maine and New England will be retiring in the near term. The 10.5 terawatt hours of additional electrical power to be provided by this project will be essential in replacing projected losses and controlling and reducing electricity costs. It is clear that Lewiston’s current transmission hub status dictates that new energy routed to Maine must enter the New England grid in Lewiston.

CMP’s investment in Lewiston as a result of this project is estimated to be approximately $250 million. This will substantially expand the City’s tax base with profound beneficial effects. Based on Fiscal Year 2016 data, Lewiston’s Assessed Value per capita was $60,690, by far the lowest among Maine’s ten largest municipalities, where the average was over $114,000 per capita. In spite of the fact that Lewiston’s per capita operating expenses were the lowest among this group of communities, at $903 per capita versus an average of $1,248, our low assessed value results in a burdensome municipal tax rate, particularly in light of our relatively low median incomes and high poverty rate. Once the project is completed, we should see approximately $6 million in annual tax revenue -- revenue that will help us meet our community’s public service needs while reducing the property tax burden on our residents.

The City is also a significant user of electricity. This project will bring 9.5 terawatt hours of additional electric power into the New England energy mix to not only help offset anticipated generating retirements but to increase the overall availability of energy to our region. Given the basic rule of supply and demand, additional energy supply will help to hold down and decrease the cost of energy in future years both for the city and for our residents.

As a result, we have concluded that there is no practicable alternative to this project when viewed in its totality. It ties into the New England grid in the ideal location; primarily uses existing utility corridors; where a new corridor is proposed, it lies within a working industrial forest and has been sited to avoid impacts on preserved lands; where impacts do exist, pain has been taken to minimize or mitigate them; and the benefits of the project far outweigh any possible impacts.

As a result, we urge the regulatory agencies to approve this project as proposed.

CONSOLIDATION OF INTERVENORS

The City of Lewiston would not object to consolidation with other intervenors who support the project due to its diversification of New England’s sources of energy, positive impact on energy costs, recognize that no practicable alternatives exist to the proposed project, and have concluded that the project would have no unreasonable effect on scenic, aesthetic, recreational or navigational uses of resources and would result in no adverse effect on the natural environment.

Sincerely yours,



 Edward A. Barrett City Administrator