STATE OF MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION

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Central Maine Power Co.)	Response of the
New England Clean Energy Connect)	Maine State Chamber of Commerce
#L-27625-26-A-N, #L-27625-TG-B-N,)	In Support of New England Clean
#L-27625-2C-C-N, #L-27625-VP-D-N,)	Energy Connect and to the
and #L-27625-IW-E-N)	Procedural Order
)	

Pursuant to the Department's August 13, 2018 First Procedural Order, the Maine State Chamber of Commerce (Maine State Chamber) hereby submits its statement of support, list of issues it will address, and statement on consolidation of intervenors. *See* First Procedural Order at ¶¶ 19-20 Paragraph 19.

I. Statement of Support for the NECEC

The Maine State Chamber supports the New England Clean Energy Connect (NECEC) Project and has intervened in this proceeding to provide evidence that the Project meets the statutory and regulatory criteria relevant to the Project.

II. Statutory and Regulatory Criteria, and Topics or Subject Matters Under Those Criteria, that the Maine State Chamber Will Address

Below are the statutory and regulatory criteria and the specific, significant, or contentious topics or subject matters under those criteria relating to the project that the Maine Chamber plans to address at the public hearing:

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

The NECEC has been carefully sited to avoid or minimize scenic, aesthetic and recreational resources. The majority of the transmission line is in an existing utility corridor, and the balance is through working forest, where new "corridors" are cut and recut on a regular basis. Views of the corridor are generally from a distance and represent a miniscule part of the overall landscape. The overhead crossing of the Kennebec River will be visible for just a few minutes of a 4-6-hour adrenaline-fueled descent down a dam-controlled river, where overhead lines are visible on the drive to

The Forks, to the dam, and at Harris Dam. Viewer expectation is not of a remote wilderness setting. The NECEC provides a regionally significant amount of clean dispatchable power at a remarkably low cost and high benefit to the environment.

2. No reasonable alternative exists (see DEP Regs. Ch. 310)

An overhead crossing in the preferred site is the least damaging alternative and no other alternative, such as crossing at Harris Dam, is reasonable due to regulatory and timing constraints. An underground crossing, while potentially feasible, would have far greater impact on land and water than stringing several lines over the river, with the poles out of site.

3. No adverse effect on the natural environment (*see* 38 M.R.S. § 484(3); DEP Regs. Ch. 375)

On a project of this scale, bringing 1,200 MW of clean energy to New England, the total permanent wetland impact is under 12 acres. Any impacts that cannot be avoided will be mitigated and compensation land offered at an unusually high rate of almost 200:1 for permanent wetland impacts. Central Maine Power will implement best practices in the design and construction of the project to avoid or minimize impacts to fish and wildlife.

4. No impact on the preservation of unusual natural areas (see DEP Regs. Ch. 375(12))

A transmission line over the portion of the river below the Kenneben River Gorge will not in any way impact the preservation of this important natural area.

The Maine State Chamber welcomes the investment represented by the NECEC, and the jobs and economic activity that will ensue. The NECEC is an important regional element in the race to mitigate climate change, and the fact that Maine will benefit economically, without having to pay for the project is a highly unusual win-win for our state.

We all use electricity; in fact, it is the only energy source that can be generated from renewables – wind, solar and hydropower. We need all of these sources for a cleaner future, but we need dispatchable hydropower to underpin the other intermittent sources. The NECEC is the most cost-effective and environmentally benign project to deliver those hydropower resources the region needs so urgently. We fully and wholeheartedly support the NECEC.

III. Consolidation of Intervenors

The Maine Chamber is willing to consolidate with other intervenors who support the NECEC because of its economic and environmental benefits for the state of Maine. We will be represented by counsel and could serve as a convener for similarly-minded intervenors.

Date: August 27, 2018

Dana Connors

President

Maine State Chamber of

Commerce