

January 31, 2019

VIA ELECTRONIC MAIL

Susanne Miller, Director
Eastern Maine Regional Office
Maine Department of Environmental Protection
106 Hogan Road, Suite 6, 3rd Floor
Bangor, Maine 04401

Re: Central Maine Power Company's New England Clean Energy Connect Project
NRCM, AMC and TU Request to Include Greenhouse Gas Impacts in Public
Hearing

Dear Ms. Miller,

This letter is filed on behalf of Intervenor Groups 2 and 10¹ to 1) support NRCM, AMC and TU's request to include greenhouse gas impacts in the public hearing, and 2) respond to Attorney Manahan's suggestion that the Groups' spokesperson be limited to their attorney. In support thereof, and in addition to the arguments and proffered evidence within the request by NRCM, AMC and TU, please also consider the following:

Green House Gas Impacts

CMP's position consistently, and in contravention of the relevant statutes, appears to argue for limitation of public access, restriction of a full and fair vetting of issues squarely within the jurisdiction of the reviewing authorities, and a stifling of the voices of affected individuals. To argue that the failure to appeal the Presiding Officer's pre-hearing conference Order regarding the topics for hearing is nothing more than cherry picking which decision should be upheld by the Presiding Officer. It flatly ignores what occurred in the last pre-hearing conference during which time the Presiding Officer invited the parties to submit, in writing, the request to include the topic of green-house gas emissions with supporting statutory references, following that pre-hearing conference. That is precisely what NRCM, AMC and TU did.

As we stated in the pre-hearing conference, it is in the best interest of all parties, the DEP and the LUPC to hear all relevant evidence and testimony on the relevant topics; not just

¹ Excepting Intervenor Alison Quick and Courtney Fraley who we do not represent.



the evidence and testimony submitted by the applicant. For those reasons Groups 2 and 10 support the request by NRCM, AMC and TU.

Limitation on Spokesperson

In response to Attorney Manahan's suggestion that Groups 2 and 10 spokesperson be limited to their attorney, we respectfully request that such limitation is not being imposed on the applicant or other parties, at least so it appeared in the pre-hearing conference. Nor is this limitation implied pursuant to the Second Procedural Order dated October 9, 2018 in which Commissioner Worcester requested that each group designate a primary spokesperson, but that such designation "does not preclude other Intervenors within the group from testifying or conducting cross-examination at the hearing." We understand that the Presiding Officer is tasked with managing the voices of all Intervenors and the applicant, and we will coordinate ourselves accordingly, but do not agree that Matt Wagner's voice has been silenced just because most in his group have retained the services of a lawyer. As the attorney for all in Group 2 and most Intervenors in Group 10, I can assure the Presiding Officer I will use my professional judgment to coordinate and manage the voices of those I represent within the groups efficiently.

Please do not hesitate to contact me should you have any questions or concerns.

Sincerely,



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cc: Service List
Bill Hinkel, LUPC Project Manager
Jim Beyer, DEP Project Manager
Clients

