

STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

and

STATE OF MAINE
LAND USE PLANNING COMMISSION

IN THE MATTER OF

CENTRAL MAINE POWER COMPANY)
NEW ENGLAND CLEAN ENERGY CONNECT)
#L-27625-26-A-N/#L-27625-TG-B-N/)
#L-27625-2C-C-N/#L-27625-VP-D-B/)
#L-27628-IW-E-N)
CENTRAL MAINE POWER COMPANY)
NEW ENGLAND CLEAN ENERGY CONNECT)
SITE LAW CERTIFICATION SLC-9)
Beattie Twp, Merrill Strip Twp, Lowelltown Twp,)
Skinner Twp, Appleton Twp, T5 R7 BKP WKR,)
Hobbs town Twp, Bradstreet Twp,)
Parlin Pond Twp, Jonson Mountain Twp,)
West Forks Plt, Moxie Gore, The Forks Plt,)
Bald Mountain Twp, Concord Twp)

**MOTION TO CONSOLIDATE AND SCHEDULE OF
INTERVENOR GROUP 8/ NEXTERA ENERGY RESOURCES, LLC**

Intervenor Group 8, which consists only of NextEra Energy Resources, LLC (“NextEra” or “Group 8”), moves to consolidate the entirety of its direct testimony and cross examination to the undergrounding alternative portion of the hearing. NextEra also moves to schedule the undergrounding alternative portion of the hearing on a date on which its expert witness, Mr. Chris Russo, is available. Group 8’s motion should be granted for the reasons set forth below:

NextEra’s direct testimony from Mr. Chris Russo is directly applicable to the undergrounding alternative. This is the only testimony NextEra submitted. The Seventh Procedural Order states that “the May hearing date will also be used to hear the testimony and

cross-examination of any other witnesses' testimony pertaining to the issue of the undergrounding alternative." Seventh Procedural Order at I (4). It also allowed for sur-rebuttal testimony on the undergrounding alternative to be filed on April 19, 2019. Despite these rulings, the hearing schedule retained Mr. Russo to appear on the April hearing dates.

Group 8's direct testimony and cross examination focuses on the underground alternative. As such, any direct, sur-rebuttal, and cross will need to be revisited at the future hearing dates on the underground option, even if Mr. Russo appears in April. Thus, we respectfully request that, assuming a date in May which accommodates all the parties can be selected, that Group 8 be scheduled to appear solely at the future hearing dates at which the underground alternative will be discussed.

For purposes of scheduling, Mr. Russo is not available until the week of May 20. He is an expert who testifies in similar matters around the world and he is scheduled to be in court in another jurisdiction outside of the United States on May 6 through May 16. We therefore respectfully request that our motion to consolidate be granted to accommodate our witness' availability in May or June.

DATED: March 29, 2019



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