



Good afternoon,

My name is Susan Ely and I am a staff attorney here on behalf of the Natural Resources Council of Maine to urge you to reject the three contracts at issue in dockets 18-64, 18-65, and 18-66. (By way of background, NRCM has been closely and actively examining this project for nearly a year, including as an intervener in the ongoing review at the Maine Public Utilities Commission since last October.)

The Natural Resources Council of Maine, or NRCM, is a 501(c)(3) nonprofit membership organization in Maine that works to protect, restore, and conserve Maine's environment, now and for future generations. For almost 60 years, the Natural Resources Council of Maine has been protecting the places and way of life that make Maine so special. We have more than 20,000 members and supporters statewide and beyond. Over 9,000 of those members and supporters live in Maine counties directly impacted by the proposed transmission line that is at issue in today's hearing.

We work throughout Maine to—

- Protect the health of Maine's rivers, lakes, streams, and coastal waters;
- Promote sustainable communities;
- Decrease air and climate-changing pollution; and
- Conserve Maine lands and wildlife habitat, including our treasured North Woods.

Central Maine Power's (CMP) New England Clean Energy Connect (NECEC) project and the related applications and contracts pose a direct threat to these goals. Simply put, this proposal is a bad for the people of Maine and Massachusetts, our economies, and our environment. CMP's proposed transmission line would:

- Cut a brand new, 53-mile-long corridor across Maine’s western mountains, harming forests, streams, wetlands, wildlife, and scenic beauty and bisecting the largest unfragmented forest east of the Mississippi;
- Suppress the development of clean renewable energy (like wind and solar) in Maine, which would provide greater economic and environmental benefits to both Maine and Massachusetts; and
- Not only fail to reduce climate change emissions but would likely even increase them.

CMP’s proposal would build a 145-mile, high-voltage, direct current transmission line from the Quebec-Maine border, to an interconnection with the existing New England grid in Lewiston. About 53 miles of NECEC’s proposed route would create a brand new transmission corridor; requiring the clearing of a large swath of Maine’s iconic North Woods, including above-ground transmission lines across the Kennebec River Gorge, a world-renowned whitewater rafting and fishing destination. The remaining 92-miles of transmission line would require clearing more vegetation and undertaking additional development within existing corridors. All told, CMP’s proposed line would result in above-ground crossings of the Kennebec Gorge, Appalachian Trail, 263 wetlands, 115 streams, and 12 inland waterfowl and wading bird habitat areas.

While we agree with other non-profits and the natural resources agencies reviewing the proposal that CMP’s proposed mitigation is wildly inadequate given the scale of the adverse impacts, our greatest concern is that this whole project, and all of the resulting environmental, social, and economic harms associated with CMP’s chosen route, will not have any benefit to the climate, and could actually result in an increase in dangerous greenhouse gas emissions.

Despite repeated opportunities and requests to do so (both informally and in an adjudicatory setting at the Maine Public Utilities Commission), CMP has failed to demonstrate that this project will have any real or quantifiable climate benefits. No new hydroelectric facilities are being constructed or

modified to supply energy to New England. Instead, CMP is using an accounting trick to argue that the NECEC will provide “clean energy” to New England. However, bringing Hydro-Quebec energy into New England through the NECEC is likely to require shifting existing sales from the New York and Ontario markets to supply New England. This shift from New York and Ontario to New England could result in no emissions benefits or an emissions increase depending on the fuel mix used to replace this energy.

Furthermore, just last week CMP admitted at Maine’s Public Utilities Commission that, depending on financial incentives, there is nothing preventing Hydro-Quebec from buying low-cost but high-carbon energy from other markets to supply its domestic load while selling its hydroelectricity to New England and other regions willing to pay above-market rates for so-called clean energy. As we all know, greenhouse gas emissions do not follow geographic boundaries, and shifting emissions from one geographic region to another will not help the climate and could place an economic and environmental burden on New England ratepayers for no real climate benefit.

These are not speculative concerns. Analysis by experts in Maine and New Hampshire (for the Northern Pass project, which had a similar relationship to Hydro-Quebec) have repeatedly identified the lack of any clear evidence that the project will result in any new reduction in greenhouse gas emissions. Hydro-Quebec has failed to appear as a party in any proceeding in order to hide behind simplistic, unverifiable claims about generation and greenhouse gasses put forward by CMP.

NRCM is also concerned that this proposal could create congestion on our electricity transmission system, which would crowd out in-state renewable energy, including wind and solar. For example, testimony from William Fowler at Maine’s Public Utilities Commission indicates that the “NECEC would indefinitely block the ability of future renewables or other generation north of the Surowiec transmission interface (in southern Maine) from participating in New England’s capacity markets.” Testimony of William Fowler, p. 5. If our goal is to address climate change through a variety of renewable energy resources, choosing a project that is highly certain to prevent new, verifiable, and New England-produced renewable energy from reaching the market does not make sense.

Massachusetts has established itself as a national leader in confronting climate change and accelerating clean energy technology. It would be unconscionable for Massachusetts to fail to fully explore and account for the real, additional climate impacts of this contract. That is especially true given the billions of dollars of ratepayer money that are on the line. CMP can try to win over public opinion with their public relations campaigns and online videos touting “clean energy”, but regulators should not be fooled.

In addition to the testimony and supporting documents I’ve given here today, I have also brought a petition urging Maine and Massachusetts decision-makers to reject this proposal. As of last Friday, two thousand six-hundred and thirty-four individuals had signed our petition opposing CMP’s proposed transmission line because CMP’s proposal would be bad for the people of Maine and Massachusetts and our economy and environment. These individuals and many organizations are increasingly expressing their alarm at this project, which CMP has tried to steam roll through Maine communities. (For example, attached to our testimony is a letter from a select board member in Starks who reacted with shock and dismay to learn that a CMP-drafted letter of support was sent on behalf of the Town of Starks without the knowledge of a member of the town’s select board.) The more Maine people and communities learn about this project, the more skeptical and concerned they are becoming. CMP is betting on state agencies in both our states acting quickly before the trail of undisclosed impacts and unanswered questions catches up to them. We urge the Department to not fall victim to this trap.

In closing, NRCM asks you to please reject these contracts related to CMP’s NECEC proposal. The costs to both Massachusetts and Maine – to our people and our environment – are too great. Maine and Massachusetts deserve better.

Thank you very much for the opportunity to comment.