

August 26, 2019

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Transmission Permitting and Technical Assistance Division
Office of Electricity Delivery and Energy Reliability
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, DC 20585

RE: Central Maine Power Company,
Docket No. PP-438

Dear Mr. Lawrence:

On July 27, 2017, Central Maine Power Company (CMP) submitted an Application for a Presidential Permit in Docket No. PP-438 authorizing the construction, operation, maintenance, and connection of the New England Clean Energy Connect at the Québec-Maine border in Beattie Township, Franklin County, Maine (the Project). As set forth in the Application, the Project is a High Voltage Direct Current (HVDC) above-ground electric transmission solution capable of delivering 1,200 MW of clean energy generation from Québec to the New England Control Area. The transmission facilities to be constructed in proximity to the Québec-Maine border as part of the Project require a Presidential Permit. As described more fully below, CMP will transfer and assign the Project to a new special purpose entity, NECEC Transmission LLC (NECEC LLC), and accordingly requests that the Department of Energy issue the Presidential Permit requested in Docket No. PP-438 in the name of NECEC LLC as the sole applicant for the Presidential Permit.

On May 3, 2019, the Maine Public Utilities Commission (Maine PUC) issued an Order Granting Certificate of Public Convenience and Necessity and Approving Stipulation in Docket No. 2017-00232 (CPCN Order). A copy of that order is attached hereto as Exhibit A. In connection with its approval of the Project, the CPCN Order approved a Stipulation between CMP, the Maine

Office of the Public Advocate, the Governor's Energy Office, Industrial Energy Consumer Group, Conservation Law Foundation, Acadia Center, Western Mountains & Rivers Corporation, City of Lewiston, Maine Chamber of Commerce, and International Brotherhood of Electrical Workers. The Stipulation is attached hereto as Exhibit B. The Stipulation and the CPCN Order require CMP, among other things, to transfer and assign the Project to NECEC LLC in order to insulate CMP and its existing transmission and distribution customers from any risks of the Project.

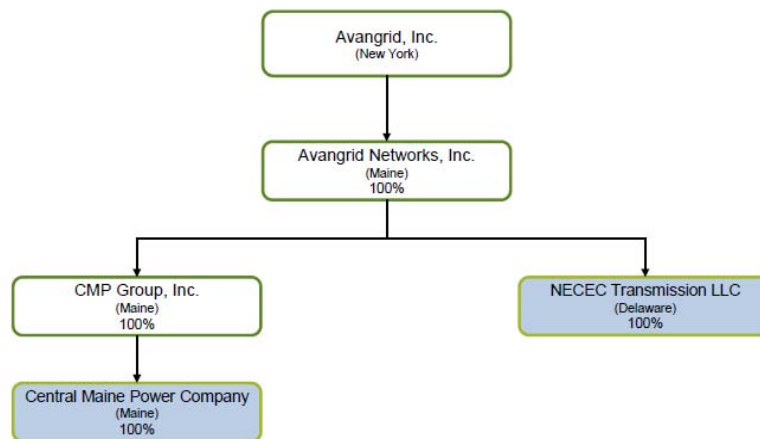
As a result, NECEC LLC will construct, own, operate, and maintain the border crossing facilities (as well as the transmission facilities from the Québec-Maine border to Lewiston, Maine). CMP will transfer to NECEC LLC all real estate interests, permits, transmission service agreements, third party vendor agreements, all other tangible and intangible assets related to the Project, and miscellaneous agreements.¹

On August 13, 2019, CMP and NECEC LLC filed with the Maine PUC a petition for approval of the creation of NECEC LLC and the transfers referenced above. A copy of that petition is attached hereto as Exhibit C.

For purposes of updating the information provided in the Presidential Permit Application to reflect the change in ownership, CMP and NECEC LLC submit the following.

1. NECEC LLC is a wholly-owned subsidiary of Avangrid Networks, Inc., which also is the upstream parent company of CMP. Avangrid Networks, Inc. is a wholly-owned subsidiary of Avangrid, Inc. (NYSE:AGR). The following organizational chart illustrates the relationship between the entities.

¹ Under the terms of the Stipulation, NECEC LLC will complete all Network Upgrades determined by ISO-NE through the required studies to be necessary under Section I.3.9 and the capacity capability interconnection standard (CCIS) of the ISO-NE Tariff and to be financially responsible for all costs associated with the construction of the Network Upgrades in accordance with applicable ISO-NE Tariff provisions. The Stipulation provides, however, that upon completion, the Network Upgrades will remain the property of CMP and CMP will be responsible for the operation and maintenance of such Network Upgrades.



2. The transfer of the Project from CMP to NECEC LLC will close upon the issuance of the U.S. Army Corps of Engineers permit for the Project, which is expected in January 2020.

3. NECEC LLC's transmission services will be regulated by the Federal Energy Regulatory Commission. NECEC LLC is a Delaware limited liability company and its principal place of business is One City Center, 5th Floor, Portland, ME 04101.

4. Avangrid, Inc. (NYSE:AGR) and Avangrid Networks, Inc. are described on page 17 of the Presidential Permit Application, including the upstream foreign ownership and affiliations of those entities and NECEC LLC. NECEC LLC will have the full support of its parents and affiliated companies' experience and expertise developing large transmission projects, including HVDC projects, and their financial strength, to successfully complete the Project on time and on budget.

5. NECEC LLC will hold contracts with foreign entities for the purchase, sale, or delivery of electric energy. Specifically, NECEC LLC will provide transmission service under four transmission service agreements with a U.S. affiliate of Hydro Québec, a Canadian utility, H.Q. Energy Services (U.S.) Inc.

6. Upon receipt of the Maine PUC approvals, CMP and NECEC LLC will provide a new signed opinion of counsel attesting that the construction, connection, operation, and maintenance of the Project is within NECEC LLC's corporate powers and that NECEC LLC has complied with or will comply with all pertinent Federal and State laws.

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Other than the ownership change required by the Maine PUC, there are no changes to the facilities to be constructed at the Québec-Maine border that are subject to the Presidential Permit.

Representatives of CMP and NECEC LLC would be pleased to meet with DOE Staff to review the CPCN Order, the transfer of the Project to NECEC LLC as a result of the CPCN Order and Stipulation, and to generally update the Staff on the status and expected timing of the ISO-New England's I.3.9 system impact study and the other state and federal permits.

Finally, at the time of the Presidential Permit application, the Electric and Magnetic Fields (EMF) Study had not been completed (see Application at 72). A copy of the study is attached hereto as Exhibit D.

For the reasons set forth above, CMP and NECEC LLC respectfully request that DOE consider NECEC LLC to be the applicant for the Presidential Permit and that the Presidential Permit be issued in the name of NECEC LLC.

Please do not hesitate to contact the undersigned if you have any questions or comments.

Respectfully submitted,

Randall S. Rich

Attorney for
CENTRAL MAINE POWER COMPANY
NECEC TRANSMISSION LLC

Enclosures

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