

**RANDALL S. RICH**  
*Partner*

1875 K Street N.W.  
Suite 700  
Washington, D.C. 20006

**PH** 202.530.6424  
**FX** 888.847.9228  
rrich@pierceatwood.com  
pierceatwood.com

July 30, 2020

**By E-Mail**

Christopher A. Lawrence  
Electricity Policy Analyst  
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:

Central Maine Power Company (CMP) hereby writes to clarify its Application for a Presidential Permit in Docket No. PP-438 for the New England Clean Energy Connect (NECEC) to ensure the NECEC's operating characteristics are accurately reflected in the Presidential Permit ultimately issued for the project.

The Application consistently refers to the delivery of 1,200 MW at Larrabee Road Substation (Larrabee Road). In order for the NECEC to deliver that quantity of electricity at Larrabee Road, the line must transmit more electricity at the border to account for line losses between the border and Larrabee Road. This physical reality is reflected in the following reference to line losses in the application (Section 2.6.1 at page 30):

The northern converter located in Québec will have a higher rating to account for losses between the two points. The HVDC line will be designed to be clearance limited (due to large conductor size to minimize losses) to the operating temperature of the line at the 1,200 MW transfer level of the link in the summer. This will naturally provide some additional line transfer capability in the winter (value to be calculated later) months, but again the expectation is that the overall DC link capability will be converter limited.

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The precise impact of line loss will be determined when the NECEC system is tested prior to being placed in service. At this time, CMP estimates that the flows at the border will need to be upwards of approximately 1,250 MW, depending on operating conditions, in order to permit deliveries of 1,200 MW at the Larrabee Road delivery point.

To ensure that the text of the Presidential Permit does not inadvertently limit the NECEC project to 1,200 MW at the border, CMP hereby clarifies that all references in the Presidential Permit to the capacity of the line at 1,200 MW should be in reference to the delivery point of Larrabee Road and that the Presidential Permit allow the NECEC to transmit sufficient quantities of energy across the border (estimated to be approximately 1,250 MW) to account for line loss between the border and Larrabee Road in order to ensure deliveries of 1,200 MW at Larrabee Road.

Please let us know if you require additional information with respect to this matter.

Very truly yours,



Randall S. Rich

Attorney for  
**CENTRAL MAINE POWER COMPANY**  
**NECEC TRANSMISSION LLC**

Attachments

cc: Melissa Pauley  
United States Department of Energy

Thorn Dickinson  
Bernardo Escudero Morandeira  
Ana Julia Mendoza Chiappori  
Nicholas J. Cicale  
Central Maine Power Company

Jared S. des Rosiers  
Pierce Atwood LLP