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Amy Dumeny,
Administrative Director
Maine Public Utilities Commission
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Augusta, Maine 04333

RE: *Central Maine Power Bolt Hill Substation Project Request for Approval Pursuant to 35-A M.R.S. § 3132-A, Docket No. 2024-00308*

Ms. Dumeny:

Abutters have expressed serious concerns related to this docket, that have not yet been addressed. Attempts to work with CMP towards a resolution have not been successful. As a representative of Ms. Sarah Dennett and 66 Schoolhouse Lane LLC, whose principal is Mr. Jorge Lorenas, I submit this letter for your consideration.

2025 Abutter Interventions and Complaint Filings

On February 8, 2025 Ms. Dennett received a letter in the mail identifying that she may be an abutter to work proposed for the Bold Hill Substation RFA. On February 16, 2025, Ms. Dennett filed Public Comments in this docket in a timely manner. As an individual customer of CMP, she does not have experience dealing with these matters. It took her a considerable amount of time to figure out how to file the Public Comments, and she was not aware that she could be put at a disadvantage in the future if she did not specifically request Intervenor status at that time. Ms. Dennett reasonably expected that the Public Comments she submitted would be taken seriously, and she would receive a response that addressed her concerns.

The complaint Ms. Dennett filed in her Public Comments described why she was concerned, including that she had been adversely impacted by transmission line work in the past. Despite this, she did not receive a response that validated her concerns and reassured her that necessary measures would be put in place to prevent future adverse impacts. Though Ms. Dennett was not familiar with the Commission's procedural process, she acted in good faith to the best of her knowledge. Ms. Dennett noted, "I received notification that left very little time or information for an educated response. I believe it is going through my property. It's hard to tell. I have existing power lines and this "rebuild" threatens to take more land (c)lose to a vernal pond."

Also in early February 2025 another abutter, 66 Schoolhouse Lane LLC, which owns property at 269 and 271 Bolt Hill Road, Eliot, received a notification by mail that they may be impacted by the proposed project. They filed a timely Request to Intervene by the deadline of February 21, 2025, and it

was granted. J.P. Nadeau, Esq. also notified the Parties that he would be representing 66 Schoolhouse Lane LLC.

Public Information and Protective Orders

In accordance with Title 35-A §1311-A, the Commission issued *Protective Order No 1 CEII* in November of 2024. In their order they clearly stated that, "**CMP shall also file a redacted public version of documents which contain Designated Confidential Information unless it seeks and obtains a waiver of this requirement from the Hearing Examiner(s)**" (Note that emphasis was not added, as this was in bold print in the Commission's Order.)

Did CMP follow the Order of the Commission? No, they filed a heavily redacted public version of their RFA, and they did not file public versions of any other documents covered by PO1 at that time. They did not request a waiver of the requirement. As the case progressed, leading up to the initial case conference, the Commission expressed concerns over CMP's broad confidentiality requests. In the initial case conference, they stated the following (emphasis added):

"staff had a number of issues" ... "one of the issues we had was just the volume of material that CMP had marked as confidential under Protective Order 1 for CEII. And **it makes it hard, I think, for anyone outside this case, including potential abutters to look and see -- really have any idea what's going on.**" ... "first of all, I guess we'd be curious to know why so much is confidential, and then let's talk about if that can be dialed back with some specific redacting." (01/21/25 Transcript, at 3, line 13)

CMP stated that they "did realize that it's not all CEII" (01/21/25 Transcript, at 4, line 6). This would have been a good time for CMP to provide additional non-confidential information to the public. CMP did not request a waiver or provide evidence in support of their claims that nearly all the information in all files (except the RFA) were confidential. When they realized that they had improperly classified a significant amount of data as CEII, they requested approval of three additional protective orders, stating, "These protective orders are intended to cover all redacted material provided in CMP's initial filing." (CMP Response to Procedural Order, 1/24/25). As these Protective Orders covered all the information that was previously redacted, they provided no relief to abutters who would later be looking for answers. Once again, CMP claimed that their position was best for the ratepayers. It is important to note that abutters would have questions later in the process. None of them had questions at this point because CMP had not notified them yet.

Did the OPA reach a determination that CMP's claims on confidential information were correct? No, they assumed that CMP was acting in good faith and followed CMP's lead. However, they also expressed skepticism that CMP had provided sufficient support to justify their request when they stated, "The one-line diagram -- yeah, I don't know the grounds for which that is confidential because I don't think it really gives people that much information, but, again, we have relied on what CMP has requested. And that's what we've marked as confidential." (01/21/25 Transcript, at 5, line 17)

Abutter Notices

CMP intentionally waited to send out the abutter notices until they were ordered to do it by the Commission. The fact that CMP stated that this practice was “normal” is cause for concern. It looks like CMP may be using this tactic to limit the level of intervention in the case, possibly thinking that it will also limit the opposition that they receive. In the initial case conference the Commission asked, CMP “have you notified any abutters yet of any of the work being done”? CMP responded, “No, we have not officially notified anyone. You know, **normally we wait for the intervention deadline to be set. I'm unsure if there's been any community outreach** that has occurred”. (01/21/25 Transcript at 7, line 9). CMP reiterated this later, when they said, “we would wait for the Commission to set the intervention deadline before we sent out the official notices.” (01/21/25 Transcript at 8, line 18).

When discussing the needs driving the project, CMP indicated that the need for an upgrade was originally identified in a 2018 study. After years of planning and investigation, they conveyed that they had no intention of sending notices to the abutters until they were told to by the Commission. When they received the notices in the mail, the abutters were expected to figure out how this massive project would impact them and submit a request to intervene by the deadline established. CMP had 6 years to think about this and abutters were given two 2 weeks (see table below). Meeting this timeline would have been onerous, even if they had received good documentation from CMP. However, the information they received was minimal, and it created many more questions than it answered. Stakeholders that understood the Commission process well enough (or received help) to view additional documentation in CMS were met with a wall of Protective Orders, requested by CMP, that blocked access to nearly all of the detailed information.

CMP did not clearly identify a valid reason for withholding the majority of the information about the project. There are statutory requirements and Commission rules that identify the absolute minimum requirements of stakeholder engagement that must be met. The Commission was not created to hold CMP’s hand and walk them through the process of stakeholder engagement to ensure that they meet their minimum obligations. CMP should take their responsibilities seriously at all time.

The issues raised here are not about business transactions. CMP needs to show R.E.S.P.E.C.T. for the human persons of Maine and the property that belongs to them. A utility providing a public service should not forget what it means to be human. Iberdrola and Avangrid have been in Maine for just over 10 years. Ms. Dennett’s family has lived on their piece of land for over 300 years. If CMP wants to get new transmission lines built or rebuilt, they should show respect for the people and the land. Ignoring stakeholders is not a way to get things approved more smoothly. Actions like this are what polarizes communities against the increased buildout of transmission and distribution infrastructure. This causes delays to projects and increased costs.

In their 1/21/25 Procedural Order, the Commission established the following schedule:

CMP to provide notice to abutters (with a copy of such notice filed in the docket)	February 7, 2025
Petitions to Intervene Due ¹	February 21, 2025
Data Requests on CMP’s Request and Attachments Due	February 28, 2025
CMP’s Data Responses Due	March 14, 2025
Technical Conference/Case Conference	March 25, 2025 at 1:00 p.m.

In their 4/4/25 Procedural Order the Commission stated that, “The Hearing Examiners also direct CMP to file on or before April 17, 2025 the affidavit of one of its witnesses adopting CMP’s request filed on November 20, 2024 and CMP’s subsequent filings as their testimony. With the filing of the affidavit, the Hearing Examiners propose that the evidentiary record in this proceeding will consist of CMP’s request, its subsequent filings, and its responses to data requests. Objections to this proposal may be filed on or before April 21, 2025.”

To summarize, abutters were provided with a notice that they may be impacted by the project. Then they had 2 weeks to file for intervenor status. Assuming their request to intervene was both submitted and approved on 2/21/25, they would receive access to the Confidential Information with only one week to review it, before Data Requests were due. Ms. Dennet filed Public Comments on 2/16/25 and expressed concerns. She did not specifically request intervenor status, so she didn’t receive it. 66 Schoolhouse Lane LLC filed for intervention on 2/21/25. Their petition was granted on 2/26/25 two days before the Data Request deadline. Less than 2 months later, the evidentiary record of the case was closed.

CMP’s False Representation of Abutter Concerns

There are multiple issues with the way that CMP represented the concerns of the abutters. The following discussion from the April 2025 Technical Conference (4/3/25 Transcript, starting at 20, line 7) is presented in a Q&A format. All questions were asked by the OPA and all answers were given by CMP:

(OPA) Q: “Are there ongoing discussions or has the landowner been satisfied?”

(CMP) A: “Yeah, so the last conversation occurred I think on March 25th in which we shared a conceptual design for the substation so they could see where their property was located in relation to the substation, and it seems to have been the end of the conversation.”

- This statement was false. CMP gave this response only 7 business days after the conversation on the 25th. In that conversation, 66 Schoolhouse Lane LLC expressed strong concern over the negative impacts that the new Bolt Hill Substation would have. CMP had no reason to believe that their response was correct.
- 66 Schoolhouse Lane LLC continued to attempt engaging with CMP to reach a resolution to their concerns from May 12, 2025 until December 2025. Throughout that timeframe, CMP did not notify the Commission of the ongoing stakeholder concerns by even a single filing in the docket. This was a 9-month period, where CMP could have set the record straight, and they chose not to.

(OPA) Q: “And in terms of expansion of footprint or right-of-way, is there new right-of-ways being used for this project or is the current footprint being expanded?”

(CMP) A: “no, it’s all within existing CMP right-of-way and land ownership.”

- This is blatantly false. The new Bolt Hill Substation is being built on a different parcel than the existing substation. CMP purchased this land specifically for this purpose.
- According to the area map provided by CMP, a greater length of 115kV line construction will be new line built where there is not an existing line, that the length of existing line that CMP will

rebuild. As the new 115kV line was routed along public road, it appears that CMP did not have an existing right of way for it. I have not confirmed that this is the case.

(OPA) Q: “Are you doing taller poles or newer standards or anything that would make a significant -- significantly different visual impact”

(CMP) A: “They will not be significantly taller or that different than the existing that’s out there today.”

- The existing Bolt Hill Substation is set back from the road, and a view of it from the road or from a nearby residence is significantly obstructed by trees
- The proposed location for the new Bolt Hill Substation is a lot that (until removed by CMP) had an existing residence in a rural neighborhood.
- The parcel chosen by CMP has a beautiful country setting with well-maintained sloping fields, extensive rock walls, landscaping, and pine trees that are notably older and taller than the other trees in the area.
- CMP’s plan is to demolish the rock walls, clear the trees, and fill in the low areas of the fields to create a level grade for the substation. This massive gravel and crushed stone pad is planned to be several feet higher than the road. This is the base for the substation, and it is on top of this that the electrical equipment will be built.
- The existing substation (that is barely visible from the road) sits in a “straight-bus” configuration. The new substation is proposed is a “breaker-and-a-half ring bus” configuration. Is this a significant difference? Yes, I haven’t seen any of the details provided for it yet, but I expect that it will be 2-3 times the size of the existing substation.

Impacts to 66 Schoolhouse Lane LLC

Why has 66 Schoolhouse Lane LLC expressed such a high level of concern over this substation location? The substation will be built directly across the street from the residences owned by 66 Schoolhouse Lane LLC. Now let’s return to the first Q&A pair from the previous section:

(OPA) Q: “Are there ongoing discussions or has the landowner been satisfied?”

(CMP) A: “Yeah, so the last conversation occurred I think on March 25th in which we shared a conceptual design for the substation so they could see where their property was located in relation to the substation, and it seems to have been the end of the conversation.”

66 Schoolhouse Lane LLC did not state, imply, or otherwise relate in any conversation with CMP over the past year, that they were satisfied with CMP’s disregard for the impacts that they would endure. They were certainly not happy to hear the detailed descriptions of how the impact would be far worse than they expected. While visiting the stakeholder’s property last month, I took a number of photographs of the area where the substation will be located. These are included as an attachment to this filing.

Future Expectations

Has CMP shown a willingness to be more open and serve their customers better going forward? No, this can be seen in their response to the following data request:

EXM-001-012: "Reference page two and three of CMP's Request for Approval filed on November 20, 2024 and the statement that "[d]ocument 5 **(FAQ) is not included because CMP has not yet prepared a document** with current project information to send to affected customers and abutters." Does CMP anticipate preparing a FAQ document to send affected customers and abutters? If so, please provide an anticipated timeline for when CMP expects this document to be made available. If not, please describe CMP's reasoning for not doing so."

CMP RESPONSE: "Yes, CMP anticipates preparing a FAQ document to send to affected customers and abutters. The FAQ document is anticipated to be available Q4 2025, closer to permitting and construction activities."

CMP set the bar low with a non-committal answer that they might provide a FAQ at the end of the year. Apparently they didn't set the bar low enough, because Q4 of 2025 came and went, and stakeholder concerns around this project are still not important to CMP. What was their priority in that quarter? It was pushing for the approval of their massive, unjustified rate increase in Docket 2025-00218. Opposition to the proposal was so strong that 845 public comments were filed with most of them being in opposition. After due consideration, the Commission dismissed the case for failing to meet Maine's statutory requirements. CMP also issued their Integrated Grid Plan at the end of 2025. As expected, it was about as useful as their stakeholder engagement on the Bolt Hill project.

Thank you for your consideration of this letter.

Sincerely,

Peter Fitzgerald, PE
Owner, Principal Engineer
Alt Engineering LLC

CC: Parties via CMS
Sarah Dennett via email
Jorge Larenas via email
J.P. Nadeau Esq. via email

Attachments: Photographs of the proposed site of the new Bolt Hill Substation.





Peter Fitzgerald
Alt Engineering LLC
LD 2113

I am Peter Fitzgerald with Alt Engineering LLC, and I am testifying in Support of this bill. I am a Professional Electrical Engineer, experienced in system planning, protection, control, and optimization.

The document attached provides a detailed example of some of the core issues that ratepayers are facing. Investor Owned Utilities (IOU) do not operate in the interest of the customers that they are supposed to be serving. IOU's answer to their shareholders and board of directors, and the focus of both groups is to maximize profits.

IOU's are also statutorily required to provide electric service to the public at just and reasonable rates. These goals stand in opposition to each other, which creates a constant battle for control. When an IOU borrows money from an affiliate company to fund capital upgrades, their incentives to build expensive projects are compounded.

There is no easy way out of this cycle, but each incremental change brings us one step closer to electric rates that people in Maine can live with. Long-Range, Integrated Grid Planning (IGP) is one of the crucial for the future of Maine. CMP and Versant recently submitted their IGP's. I haven't reviewed Versant's IGP yet, but I will summarize CMP's IGP here: CMP plans to continue to poorly manage the grid, pretend that it is not capable of controlling it more efficiently, increase spending rapidly, and refuse to perform the required cost/benefit analysis. This is not an exaggeration or an overstatement. It is what the report documents. Have I actually read the entire report? Yes. How many engineers at CMP have read the whole report? I don't know, but I would like to.

Peter Fitzgerald, PE
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