

October 19, 2018

Mr. James R. Beyer
Maine Department of Environmental Protection
Division of Land Resources Regulation
106 Hogan Road
Bangor, ME 04401

Mr. Bill Hinkel
Land Use Planning Commission
Department of Agriculture, Conservation and Forestry
18 Elkins Lane
Augusta, Maine 04330

Mr. Jay Clement
U.S. Army Corps of Engineers
Maine Project Office
442 Civic Center Drive, Suite 350
Augusta, Maine 04330

**RE: New England Clean Energy Connect Project
Additional Supplemental Application Materials and HDD Application Amendments**

Dear Mr. Beyer, Mr. Hinkel and Mr. Clement:

Central Maine Power Company (CMP) is pleased to provide a package of additional supplemental materials for the New England Clean Energy Connect (NECEC) project, which includes amendments to the Site Location of Development Act (Site Law) and Natural Resources Protection Act (NRPA) permit applications that incorporate an underground crossing of the Upper Kennebec River using horizontal directional drill (HDD) technology.

In addition, CMP is providing its response to the Maine Department of Environmental Protection (MDEP) and the Land Use Planning Commission's (LUPC) September 4, 2018 additional information requests, updates to its applications associated with natural and cultural resource identification, minor project design modifications, updated natural resource maps, adjustments to impacts and an updated Compensation Plan. CMP has summarized these items below.

Attachment A: Response to MDEP/LUPC September 4, 2018 Additional Information Request (AIR)

CMP received follow-up questions (the AIR) from the MDEP and the LUPC after their review of CMP's Update to NRPA and Site Law Application Materials, filed August 14, 2018. The attached response to the AIR provides a variety of supplemental materials, which includes, but is not limited to:

- Upper Kennebec River- River Rafting Experience Survey
- Updated CMP Compatible Woody Species List

- Revised Above Ground Historic Resources Identification Survey, NRHP Evaluation, and Findings of Effects Report
- Access for Compensation Parcels Memorandum
- Roaring Brook Mayfly and Northern Spring Salamander Survey Results
- Supporting Materials in Response to the MDEP Peer Review Report for Visual Quality and Scenic Character

Attachment B: MDEP Solid Waste Disposal Information Request Response

CMP received a request for additional information from Randy McMullin, MDEP, related to his review of CMP’s Site Law Application, Section 18.0 Solid Waste. CMP’s response to the information requested is provided in Attachment B.

Attachment C: NECEC Kennebec River HDD Site Location of Development (Site Law) Application Amendment

CMP is submitting an amendment to its NECEC Site Law Application, filed on September 27, 2017, to include an HDD crossing beneath the Kennebec River and installation of associated termination stations. The Kennebec River HDD Site Law Application Amendment addresses only those changes which occur as a result of the HDD project modification.

Attachment D: NECEC Kennebec River HDD Natural Resources Protection Act (NRPA) Application Amendment

CMP is also providing an amendment to its NECEC NRPA Application, filed on September 27, 2017, to include the HDD project modifications. The Kennebec River HDD NRPA Application Amendment addresses changes that pertain only to the HDD development.

Attachment E: Rare Plant and Unique Natural Community Avoidance, Minimization, and Mitigation Memo

CMP conducted surveys within the NECEC project in July 2018 to document occurrences of rare plants and unique natural communities. In October 2018 CMP, Maine Natural Areas Program, MDEP, and United States Fish and Wildlife Service (USFWS), held a consultation meeting to discuss avoidance, minimization, or mitigation measures. CMP’s proposed avoidance, minimization, and mitigation for these plants and communities is contained within this memo.

Attachment F: Natural Resources Peer Review Memo

This memo documents CMP’s resolution of MDEP’s third party peer review of natural resources within the NECEC Project. The letter documents the additional field delineations and incorporation of the spatial information into the updated application materials.

Attachment G: Updated Natural Resources Tables

As a result of the HDD design modification, natural resources peer review results, identification of natural resources through additional survey, minor project modifications, and minor access road adjustments, an update to the natural resources tables and impacts is provided.

Attachment H: Updated Natural Resources Maps

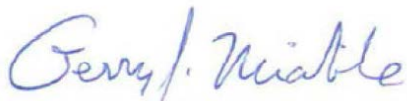
As a result of the HDD design modification, natural resources peer review results, identification of natural resources through additional survey, minor project modifications, and minor access road adjustments, an update to the natural resources maps is provided.

Attachment I: Compensation Plan Update

The NECEC Compensation Plan is an update to the plan filed in August 2018. This plan incorporates changes to the NECEC Project as a result of design modifications, natural resources peer review results, documentation of rare plants and wildlife through survey efforts, and additional consultation sessions held with resource agencies. In addition to the proposed Compensation Plan package filed in August 2018, this updated plan includes additional contributions to the Maine Endangered and Nongame Wildlife Fund (Title 12, § 10253) and Maine Natural Areas Conservation Fund. The plan also includes a detailed Culvert Replacement Program, which describes CMP's commitment to assess and restore habitat connectivity to coldwater fisheries resources within the Project areas.

If you have any questions regarding this submittal, please give me a call at (207) 629-9717 or email gerry.mirabile@cmpco.com.

Sincerely,



Gerry J. Mirabile
Manager – Environmental Projects
Environmental Permitting
AVANGRID Networks, Inc.

Enclosures

cc: MDEP Service List; LUPC Service List
File: New England Clean Energy Connect

Attachment A
Response to MDEP/LUPC September 4, 2018 Information Request

Attachment B
MDEP Solid Waste Disposal Information Request Response

Attachment C
NECEC Kennebec River HDD Site Law Application Amendment

Attachment D
NECEC Kennebec River HDD NRPA Application Amendment

Attachment E
Rare Plant and Unique Natural Community
Avoidance, Minimization and Mitigation Memo

Attachment F
Natural Resources Peer Review Memo

Attachment G
Updated Natural Resources Tables

Attachment H
Updated Natural Resources Maps

Attachment I
Compensation Plan Update