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Admitted in: MA, ME, NH

March 11, 2019

James R. Beyer  
Maine Dept. of Environmental Protection  
106 Hogan Road, Suite 6  
Bangor, ME 04401

Bill Hinkel  
Land Use Planning Commission  
22 State House Station  
Augusta, ME 04333-0022

RE: NECEC – Cross-Examination Filing of Central Maine Power Company

Dear Jim and Bill:

I am enclosing the Cross-Examination Filing of Central Maine Power Company.

Thank you.

Sincerely,



Matthew D. Manahan

Enclosure

cc: Service Lists (via email)

STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

and

STATE OF MAINE  
LAND USE PLANNING COMMISSION

IN THE MATTER OF

CENTRAL MAINE POWER COMPANY )  
NEW ENGLAND CLEAN ENERGY CONNECT )  
#L-27625-26-A-N/#L-27625-TG-B-N/ )  
#L-27625-2C-C-N/#L-27625-VP-D-N/ )  
#L-27625-IW-E-N )

CENTRAL MAINE POWER COMPANY )  
NEW ENGLAND CLEAN ENERGY CONNECT )  
SITE LAW CERTIFICATION SLC-9 )  
Beattie Twp, Merrill Strip Twp, Lowelltown Twp, )  
Skinner Twp, Appleton Twp, T5 R7 BKP WKR, )  
Hobbs town Twp, Bradstreet Twp, )  
Parlin Pond Twp, Johnson Mountain Twp, )  
West Forks Plt, Moxie Gore, )  
The Forks Plt, Bald Mountain Twp, Concord Twp )

**CROSS-EXAMINATION FILING OF  
CENTRAL MAINE POWER COMPANY**

Pursuant to the Maine Department of Environmental Protection (DEP) email dated March 5, 2019, Central Maine Power Company (CMP) files the following list of witnesses it anticipates cross-examining at the DEP and Maine Land Use Planning Commission (LUPC) hearing, and the amount of time that CMP anticipates such cross-examination will take. CMP reserves the right to cross-examine rebuttal witnesses who have not yet filed testimony, but cannot anticipate which rebuttal witnesses it will cross-examine and the amount of time such cross-examination will take, given that rebuttal testimony will not be filed until March 21.

At the outset, CMP notes that it is difficult to anticipate the time that cross-examination will take, given that witnesses may be grouped into witness panels. Should that occur, CMP anticipates that cross-examination will take less time than indicated below. For example, Groups 2 and 10 indicated in a March 8, 2019 filing that their witnesses would be grouped into three witness panels. While it is unclear on whose behalf those panels would testify,<sup>1</sup> it appears that Witness Panel 1 (E. Buzzell, L. Caruso, G. Caruso, C. Russell, G. Robinson, R. Merchant) would testify on DEP-only subtopics on behalf of Group 2, whereas Witness Panels 2 (M. Wagner, T. DiBlasi, C. Carpenter, N. Hale, K. Barkley) and 3 (E. Sherman, M. Farrar, K. Lyman, J. Presiendorfer) would testify on LUPC-only subtopics on behalf of Group 10.<sup>2</sup> This would largely comport<sup>3</sup> with the groups' February 15, 2019 witness list, which designates Merchant and Robinson as Group 2 witnesses only, and Presiendorfer as a Group 10 witness only. It is unclear, though, why Group 10 requires two witness panels for the topic of Scenic Character and Existing Uses, and whether those LUPC-only intervenors intend to testify on the subtopics within Scenic Character and Existing Uses that are outside the scope of the LUPC hearing.

With those caveats, CMP proposes to cross-examine the following witnesses for the following amounts of time:

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<sup>1</sup> As CMP noted in its March 7, 2019 Motion to Strike, Merchant, Presiendorfer, and Robinson submitted prefiled direct testimony purportedly on behalf of both Group 2 and Group 10, but that does not comport with the February 15, 2019 witness list of Groups 2 and 10. Furthermore, the Local Residents and Recreational Users (Group 10) intervenors were granted intervention in the LUPC proceeding only and West Forks Plantation (Group 2) was granted intervention in the DEP proceeding only.

<sup>2</sup> CMP renews its objection to the Group 2 and Group 10 testimony, as no witness in either group designated which portions of their testimony are specific to LUPC's review, and no witness included LUPC in the case caption. The Group 2 and 10 belated March 8, 2019 "Revised Pre-Filed Testimony Cover Pages" filing, which attempts to remedy case caption omissions, ignores the deadlines imposed by the presiding officers in this proceeding and should be disregarded. Nor does it rectify the problems with Group 2 and 10 witness testimony that CMP identified in its March 7, 2019 Motion to Strike other than adding LUPC to the case captions.

<sup>3</sup> Mr. Buzzell is a Group 10 witness.

<b>WITNESSES TO BE CROSS-EXAMINED</b>	<b>CROSS-EXAMINATION TIME</b>
R. Haynes (Group 1, DEP only)	10 minutes
J. McMahon (Group 1, DEP only)	30 minutes
Groups 2 and 10 Witness Panel 1 (E. Buzzell, E. Caruso, G. Caruso, R. Merchant, G. Robinson, C. Russell)	45 minutes
E. Barrett (Group 3)	5 minutes
D. Connors (Group 3)	5 minutes
R. Meyers (Group 3)	5 minutes
G. Poole (Group 3)	5 minutes
A. Calhoun (Group 4)	30 minutes
R. Joseph (Group 4)	15 minutes
D. Publicover (Group 4)	15 minutes
J. Reardon (Group 4)	30 minutes
T. Towle (Group 4)	15 minutes
M. Novello (Group 5)	10 minutes
M. Hunter (Group 6, DEP only)	15 minutes
A. Cutko, B. Emerson, R. Wood (Group 6, DEP only)	30 minutes
J. Christopher (Group 7)	5 minutes
L. Warren (Group 7)	5 minutes
C. Russo (Group 8)	15 minutes
Group 10 Witness Panel 2 (LUPC only): K. Barkley, C. Carpenter, T. DiBlasi, N. Hale, M. Wagner	15 minutes
Group 10 Witness Panel 3 (LUPC only): M. Farrar, K. Lyman, J. Presiendorfer, E. Sherman	15 minutes

Dated this 11<sup>th</sup> day of March, 2019.



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