

**STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION
IN THE MATTER OF**

and

**STATE OF MAINE
LAND USE PLANNING COMMISSION**

Central Maine Power Company)	
New England Clean Energy Connect)	
#L-27625-26-A-N)	APPLICATION FOR NATURAL
#L-27625-TG-B-N;)	RESOURCES PROTECTION ACT
#L-27625-2C-C-N;)	PERMIT AND SITE LOCATION OF
#L-27625-VP-D-N; and)	DEVELOPMENT ACT PERMITS
#L-27625-IW-E-N)	
)	
Central Maine Power Company)	
New England Clean Energy Connect)	
Site Law Certification SLC-9)	

INTERVENOR GROUP 3 CROSS-EXAMINATION ESTIMATES

In response to the Maine Department of Environmental Protection’s (Department) March 5, 2019 email requesting a list of witnesses each group intends to cross-examine and the amount of time each group anticipates needing for such cross-examination, Intervenor Group 3 (Group 3)¹ hereby submits the following:

Group 3 asks to be allowed to cross-examine every witness for an average of five minutes, understanding that many or most will not be cross-examined when the time comes. We cannot know in advance what witnesses may need to be cross-examined. It depends on what

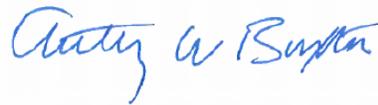
¹ For purposes of the Department’s hearing, Group 3 consists of: (1) Industrial Energy Consumer Group; (2) City of Lewiston; (3) International Brotherhood of Electrical Workers, Local 104; and (4) Maine Chamber of Commerce. For purposes of the Commission’s hearing, Group 3 also includes the Lewiston-Auburn Chamber of Commerce.

Central Maine Power Company and other parties do at the hearings and how each witness presents his or her testimony. As you know by now, Group 3's issues relate to the reasonableness analyses permeating the relevant statutes, not highly specific environmental issues; thus, our cross-examination would likely, but not necessarily, be focused on impeachment. We ask for a total number of minutes comparable to what any other intervenor group gets. The justification for cross-examining a witness is not dependent on the subject matter of our pre-filed testimony.

DATED: March 11, 2019

Respectfully submitted,

Spokesperson for Intervenor Group 3



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