

State of Maine  
Department of Environmental Protection  
And  
Land Use Planning Commission

**In the Matter of:** Central Maine Power Company New England Clean Energy Connect  
Application for Site Location of Development Act and Natural Resources Protection Act Permits

Regarding the Merrill Strip Alternative

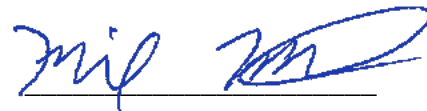
November 12, 2019

Intervenor Group 5 hereby provides written comments to Central Maine Power Company's proposal to re-open the record and amend its applications to re-route the NECEC project around the Beattie Pond P-RR subdistrict by using the Merrill Strip Alternative.

Group 5 takes no formal position for or against the proposed amendment. We offer no testimony on the merits of this alternative relative to the originally filed route. Similar to our comments to the original application, photos and photosimulations of views experienced entirely from private lands should not be a consideration in your analysis. We recognize the precedent for consideration of scenic character from public viewsheds, but believe that substantial consideration of views entirely from privately owned lands may create confusion to the public.

To this end, we believe that Exhibit C-2 and photosimulation 59 (views entirely from privately owned land) are not relevant to the consideration of scenic impact to the public. To be clear, we do not have similar concerns regarding Exhibit C-1.

Respectfully Submitted,



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