

STATE OF MAINE  
PUBLIC UTILITIES COMMISSION

Docket No. 2010-180

August 15, 2011

CENTRAL MAINE POWER COMPANY and  
PUBLIC SERVICE OF NEW HAMPSHIRE  
Request for Certificate of Public Convenience  
and Necessity for the Somerset County  
Reinforcement Project Consisting of the  
Construction of Approximately 39 miles of 115  
kV Transmission Lines ("Section 241")

ORDER APPROVING  
STIPULATION

Welch, Chairman;<sup>1</sup> VAFIADES and LITTELL, Commissioners

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**I. SUMMARY**

In this Order, we approve a Stipulation<sup>2</sup> filed on May 7, 2011 by Central Maine Power Company (CMP), the Office of the Public Advocate (OPA), the Conservation Law Foundation (CLF), Highland Wind, LLC (Highland Wind), the Penobscot Indian Nation, NextEra Energy, and the Maine Renewable Energy Association (MREA). The Stipulation contains the Signatories' agreement to recommend (1) approval of CMP's Certificate of Public Convenience and Necessity (CPCN) to build the Somerset County Reinforcement Project, known as Section 241, which consists of (a) a 39 mile 115 kV transmission line from Wyman Hydro Substation in Moscow, Maine to connect with line 241A in Benton, Maine and (b) associated substation elements; (2) extension of Ombudsman services, as developed in accordance with the MPRP in Docket No. 2008-255, to abutters on the Section 241 line; (3) a process for prospectively ensuring greater transparency in verifying that ratepayers are receiving the value received by CMP from the salvage of removed or replaced transmission equipment. The Stipulation also contains CMP's agreement to (a) seek Commission approval for any re-conductoring or replacement of Section 83; (b) file an annual report describing any routine maintenance upgrades or changes to Section 83 plant and (c) to the extent that the cost of Section 241 exceeds by 10% the estimated cost of the line, file a report at the Commission, documenting the cost expenditures and explaining the reason for the cost overruns.

We find that the Stipulation presented to us meets our criteria for approval in that the process that lead to the Stipulation was fair; the stipulating parties represent a broad spectrum of interests; and that the stipulated result is reasonable, and is both consistent with the public interest and with all relevant statutory mandates. In particular, we find that the transmission solution provided for in the Stipulation meets reliability needs over the planning horizon and when looked at as a whole, will benefit Maine ratepayers when all

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<sup>1</sup> Chairman Welch did not participate in the deliberation of this matter.

<sup>2</sup> The Stipulation is appended as Attachment A to this Order.

relevant factors, including electrical need, economics and the support for development of indigenous renewable energy resources, are considered.

## II. PROCEDURAL HISTORY

On August 2, 2010, CMP filed a Petition for a CPCN to construct a new 39-mile 115 kV electric transmission line in central Maine originating at Wyman Hydro Substation in Moscow and terminating at Section 241A in Benton, Maine ("Petition"). The Petition did not include a transmission needs assessment study for future Western Maine wind generation, as required by the Order Approving Stipulation in Docket No. 2008-225 (MPRP CPCN proceeding). In that Order, the Commission stated,

As noted above, as part of our approval of the Settlement MPRP we will issue a CPCN for the Western Spur project. Although we find that the evidence in the case establishes a need for this project at this time, we also find the Examiner's Report's recommendation that CMP conduct a comprehensive analysis of the transmission needs in Western Maine has merit. Therefore, as a condition of our approval here, we will require CMP to supply such an analysis as part of its next CPCN for a transmission project in that area of the State.

*Central Maine Power Company and Public Service of New Hampshire, Request for Certificate of Public Convenience and Necessity for the Maine Power Reliability Program (MPRP), Docket No. 2008-255, Order Approving Stipulation (June 10, 2010) at 23. The Ordering paragraph directed CMP "to file a comprehensive analysis of transmission needs in the Western Maine region in its next CPCN filing seeking approval of a transmission project in that area of the State." Id. at 28.*

A Notice of Proceeding, which provided interested persons with an opportunity to intervene and also scheduled an Initial case conference for September 14, 2010, was issued on August 25, 2010. A copy of the Notice was sent to the service list in Docket 2008-255. In addition, CMP was directed to send a copy of the Notice to the municipal officers of the municipalities in which the transmission lines would be located and to the landowners along the transmission line corridors. The Notice also discussed the absence of the required Western Maine Study and a separate procedural order set forth a process to address how the case should proceed in the absence of the required study.

The Hearing Examiner granted the Petitions to Intervene of the Office of the Public Advocate, Blue Sky West, GridSolar, IECG, Maine Renewable Energy Association, NextEra, Conservation Law Foundation, Deborah Stanford and Robert Harrison, and the late-filed petitions to intervene of Highland Wind, Friends of Maine's Mountains, the Penobscot Indian Nation, and ISO-NE. The Commission held technical conferences on the following dates: October 15, 2010; November 17, 2010; January 6, 2011; April 29, 2011; May 17, 2011; and June 2, 2011.

On December 22, 2010, CMP filed Western Maine Preliminary Findings and on February 18, 2011, the Company filed its Western Maine Renewable Integration Study. On May 12, 2011, the Commission's Advisory Staff (Staff) issued a Bench Analysis. None of the intervenors filed direct testimony, and on May 26, 2011, CMP and Highland Wind filed rebuttal testimony. After a noticed settlement conference and two noticed telephone conferences to discuss a draft stipulation, CMP filed the proposed Stipulation on June 20, 2011 and the fully executed Stipulation on June 23, 2011. In accordance with a schedule set forth in Procedural Orders, the Friends of Maine Mountains (FOMM) filed an objection to the proposed Stipulation, and CMP and Highland Wind filed comments responding to FOMM's objection. The Commission heard oral argument on July 12, 2011. CMP, Highland Wind, CLF and FOMM participated in the oral argument.

### **III. BACKGROUND**

Several events preceded the filing of the CPCN for Section 241. First, a study conducted for CMP and completed in 2006, showed that a switchyard at Heywood Road in Benton was needed to mitigate low voltages and, possibly, voltage collapse in the Waterville/Winslow/Skowhegan area. The same study showed that while the switchyard would mitigate the voltage issues, it would also cause thermal overloads. Accordingly, the 2006 study indicated that with the construction of the Heywood Road Switchyard, a large portion of Section 83 would have to be re-rated (in addition to some additional related upgrades). In 2007, ISO-NE determined that the Heywood Road Switchyard and the Section 83 re-rate would not have a significant adverse impact on the transmission system. An additional study, completed in 2008 recommended the construction of Section 241 as an alternative to the Section 83 re-rate.

CMP completed the construction of the Heywood Road switchyard in 2009 and in the same year submitted a revised proposed plan application to ISO-NE for the construction of Section 241, seeking a no-significant adverse impact determination from ISO-NE. This determination is necessary for the project to go forward and for regional cost treatment. CMP also submitted a Transmission Cost Allocation Application for approval of regional cost sharing for Section 241 on January 11, 2010. On December 28, 2010, ISO-NE approved the regionalization of the cost of Section 241, then projected to cost \$32.787 million.

### **IV. DESCRIPTION OF SECTION 241**

The proposed CMP 115 kV transmission line (Section 241) will be built as a single-circuit on single wood pole construction (typically called vertical construction). These will be tangent single poles with the conductors configured vertically on davit type arm supports. Structures will be placed approximately 450 feet apart. The conductor to be installed will be 1113 Kcm 45/7 aluminum conductor (45 strands) to steel reinforced (7 strands) type ACSR (Aluminum core steel reinforced). An aerial shield wire, made up of fiber optic ground wire (OPGW), will also be installed and running along the top of each structure. This shield wire is used for system protection from lightning strikes as well as communication link to metering and protection equipment (relays). Pole heights

will generally average between 70 to 80 feet, and CMP expects to install approximately 465 structures in total for the proposed transmission line.

The length of the entire new section 241 is 39 miles starting at Wyman Hydro Substation and ending where it intersects with the Rice Rips Substation tap (existing section 241A). The new section 241 will run adjacent to the existing section 83 in the same right of way for approximately 21.4 miles to the Lakewood Substation Tap (section 241B). From there the line will continue to utilize the existing section 83 right of way running southeasterly for approximately 17.3 miles to the Rice Rips Tap.

The termination of the new Section 241 at Wyman Hydro Substation will be three phase and the work will include all 115 kV electrical equipment, structures, and foundations from the new transmission line termination to the bus side of a 115 kV breaker disconnect switch, a parallel bus design, single phase bus Current Voltage Transformer (CVT)<sup>3</sup> and switch. It also includes a new control house located on the south side of the existing control house with a new cable trench and cables from the new 115kV electric equipment to the new control house. The work at Heywood Road Substation is limited to the fiber-optic cable addition required for relay, protection, and control purposes.

At both the Lakewood Tap (Section 241B) and Rice Rips Tap (section 241A) three phase line switch breakers will be used to terminate and provide protection for the transfer of these taps from the existing Section 83 to the new line (section 241).<sup>4</sup>

## V. DESCRIPTION OF THE STIPULATION

The Signatories to the Stipulation agree that CMP has demonstrated that a reliability need exists in the Waterville-Winslow-Skowhegan area and that the reliability need could be met by either Section 241 or a re-rate of Section 83 (with certain additional transmission facilities). However, the Signatories to the Stipulation agree that Section 241 provides additional benefits that are not offered by the Section 83 re-rate; specifically, the Signatories agree that Section 241 will provide: (1) a more robust system that results in increased flexibility for operating the system; (2) greater longevity; (3) greater area export capability and (4) a transmission system element that is beneficial in the context of potential additional transmission expansion measures that may be needed to accommodate the integration of additional renewable generation in Western Maine. The Signatories also point to the fact that the construction of Section 241 will result in a portion of the existing Section 241 from Heywood Road to Rice Rips that is now non-PTF to become PTF.

The Stipulation recognizes that the cost of Section 241 is greater than the cost of a re-rate of Section 83 and provides a range for the incremental cost of Section 241 over the

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<sup>3</sup> For each phase of the three phase bus, a current voltage transformer would be installed to measure line voltage output to be used for system protection, metering and control functions. This equipment is essential for reading the voltage output for relay protection.

<sup>4</sup> A fuller description of the project is provided as Attachment B.

cost of the Section 83 re-rate (and additional required facilities). Specifically the Stipulation provides a range of approximately \$2 million to \$8.5 million for the amount of the incremental cost. The Stipulation further states that at an 8% load-ratio share, the incremental cost to Maine ratepayers is estimated to not exceed \$680,000.

The Signatories to the Stipulation agree that the benefits described above justify the range of incremental cost, and recommend that the Commission issue an order granting a CPCN to CMP to construct Section 241, which is estimated to cost \$32.97 million, with 98% of the cost of the project already secured and firm through a completed competitive bid process. The Stipulation also contains the following additional provisions:

- Ombudsman services consistent with those provided in Docket No. 2008-255 will be extended to abutters on the Section 241 corridor.
- CMP's agreement to prospectively ensure that ratepayers receive the salvage value, if any, associated with transmission line facilities, including MPRP facilities, replaced or otherwise removed from service and to provide additional transparency in the treatment of transmission line salvage costs and the manner in which ratepayers are receiving any salvage value. CMP's obligation under the agreement includes making an annual information filing at the Commission at the time of the informational filing that CMP makes at the Federal Energy Regulatory Commission. The annual filing will include the following information: (1) identification of rebuilds or other projects that involve removal, replacement or salvage of transmission equipment during the test year, (2) the estimated salvage value of that equipment, (3) the value received by CMP and (4) the ratemaking treatment of that value. The Stipulation allows CMP to comply with the informational filing requirement by submitting construction contracts that contain explicit provisions relating to contractors retaining the value of the salvage.
- A requirement that CMP will seek Commission approval if it seeks to rebuild Section 83 within 10 years, even though Section 3132 of Title 35-A does not require CMP to file for CPCN approval of such a project. The requirement for Commission approval applies to any project involving a re-conductoring and structure replacement of section 83, but not to a re-rating or other routine maintenance of Section 83.
- CMP's agreement to file for the next ten years, an annual report describing any routine maintenance upgrades or changes to Section 83 plant.
- CMP's agreement to file a report at the Commission if the cost of Section 241 exceeds by 10% the \$32.97 million estimate. The report is required to document the cost expenditures and explain the reason for the cost overrun.

## VI. FOMM OPPOSITION TO THE STIPULATION

### A. Cost Allocation

FOMM claims that if Section 241 is constructed, "Highland Wind (and possible other generators) should be required to pay the incremental difference between the cost of Section 241 and the re-rate of Section 83." FOMM Objection at 8. FOMM refers to the rate treatment in the Record Hill case in which the cost of most of the upgrade needed to interconnect Record Hill to the transmission system without degrading the system was allocated to Record Hill. See, *Central Maine Power, Co., Request for Certificate of Public Convenience and Necessity to Build a 115 kV Transmission Line Between Rumford and Roxbury to Interconnect Record Hill Wind, LLC, Order Granting Certificate of Public Convenience and Necessity (September 9, 2010) (Record Hill)*. FOMM's estimate of the incremental difference between the cost of re-rating Section 83 (with the needed MPRP components) and building Section 241 has ranged from \$5 million to \$9 million.

### B. Non-Transmission Alternatives

FOMM asserts that CMP has failed to meet its obligation to study non-transmission alternatives "that would relieve congestion, thus addressing an issue put forth by CMP as a reason for transmission construction." FOMM Objection at 2. FOMM further asserts that reducing transmission constraints that limit the amount of energy that can be transmitted to "the out of state market" is not an issue of public need "unless a direct resulting adverse reliability impact on Maine ratepayers can be shown, or unless it can be shown that Maine ratepayers will in fact benefit from supporting the cost of construction of a new transmission." FOMM further points out that CMP had not shown whether the construction of Section 241 would lead to lower costs to Maine consumers and asserts that increasing transfer capability is not the lowest cost way to address transmission constraints. Instead, according to FOMM, CMP should have analyzed whether "backing down" generation as an NTA would be less costly than building Section 241. Since CMP did not explore this NTA, FOMM argues, the Commission should not approve the Stipulation and should not grant the CPCN for Section 241.

## VII. DECISION

### A. Standard of Review

Section 3132 of Title 35-A prohibits the construction of a transmission line of 69kV or more, unless the Commission has issued a certificate of public convenience and necessity approving the construction. 35-A M.R.S.A. § 3132(1) and (2). A Commission order approving or denying all or a part of the proposed transmission line must make specific findings with regard to the public need for the transmission line. Specifically, the statute provides in relevant part:

In determining public need, the commission shall, at a minimum, take into account economics, reliability, public health and safety, scenic, historic and recreational values, state renewable energy generation goals, the proximity of the proposed transmission line to inhabited dwellings and alternatives to construction of the transmission line, including energy conservation, distributed generation or load management.

35-A M.R.S.A. § 3132(6)<sup>5</sup>. The Commission's rule implementing this provision states, in relevant part:

The Commission establishes public need by determining that ratepayers will benefit by the proposed transmission line. Benefits are determined based upon the electrical need for the line, taking into account economics, safety and reliability. The proposed transmission line must be reasonable compared to the other alternatives. *Cost is an important consideration, but public need can be established for a proposed transmission line that is not the least cost alternative because aesthetic, environmental or other factors justify a reasonable cost increase.* Public need of a transmission line proposed by a non-utility, and for which a certificate of public convenience and necessity is required by 35-A M.R.S.A. § 3132(2) and this rule, shall be determined in the same manner that the Commission determines public need for a transmission line proposed by a transmission and distribution utility.

Chapter 330 (emphasis added).

In addition to section 3132 of Title 35-A, we also consider the Maine Wind Energy Act 35-A MRSA § 3402 et seq. The Maine Wind Energy Act finds that it is in the public interest to encourage wind energy development in a way that achieves cost effective and sustainable energy production and "that the development of the wind energy potential in the State needs to be integrated into the existing energy supply and transmission systems in a way that achieves system reliability, total capital cost-

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<sup>5</sup> There are two different current version of this subsection. One contains the language above and the other contains the following language:

Except as provided in subsection 6A for a high-impact electric transmission line, if the commission finds that a public need exists, it shall issue a certificate of public convenience and necessity for the transmission line. In determining public need, the commission shall, at a minimum, take into account economics, reliability, public health and safety, scenic, historic and recreational values, the proximity of the proposed transmission line to inhabited dwellings and alternatives to construction of the transmission line, including energy conservation, distributed generation or load management.

The conflict was corrected in Public Law Ch. 281, which will become effective September 28, 2011. The amended version of 35-A M.R.S.A. § 3132(6) resolves the conflict by including language from both former versions of this subsection into the new subsection.

effectiveness and optimum short-term and long-term benefits to Maine people." 35-A M.R.S.A. § 3402.

In addition, since the approval of the Section 241 line is presented to us through a stipulation, we must find that the parties joining the agreement represent a sufficiently broad spectrum of interests that we can be assured that there is no appearance or reality of disenfranchisement; that the process that led to the stipulation was fair to all parties; and that the stipulated result is reasonable and not contrary to legislative mandates. We also have recognized that we have an obligation to ensure that the overall stipulated result is in the public interest. *Central Maine Power Company, Request for Approval of Alternative Rate Plan*, Docket No. 99-666 (Nov. 16, 2000); *Central Maine Power Company, Proposed Increase in Rates*, Docket No. 92-345(II) (Jan. 10, 1995).

B. Do the Parties to the Stipulation Represent a Broad Spectrum of Interests?

The Stipulation presented to us is not unanimous and is opposed by FOMM. However, FOMM does not argue that the Commission's first criterion has not been satisfied in this case. We find that the first criterion has been met in this case. In *Public Utilities Commission, Investigation Into Regulatory Alternatives for the New England Telephone and Telegraph Company d/b/a NYNEX*, Docket No. 94-123 (Reopened), Order at 5 (March 17, 1998), the Commission noted that the primary purpose of the Commission's first stipulation approval criterion (that a broad spectrum of interests were represented in the stipulation) is to ensure that the Commission does not approve stipulations where the signing parties represent only a narrow interest. The criterion is not intended to require, and does not mean, that all parties participating in a case must sign a stipulation for the Commission to approve it. In the past, the Commission has held, as a general matter, a stipulation entered into by the utility and the Public Advocate, which generally represent opposite views in the ratemaking process, constitutes a sufficiently broad spectrum of interests to satisfy the first criterion. *Central Maine Power Company Chapter 120 Information (Post ARP 2000) Transmission and Distribution Utility Revenue Requirements and Rate Design and Request for Alternative Rate Plan*, Docket No. 2007-215, Order Approving Stipulation at 16 (July 1, 2008). In the case before us, the Stipulation was entered into by the utility, the OPA, a representative of the environmental community (CLF), as well as parties that have interest in renewable generation in Maine (MREA, Highland Wind, Penobscot Nation, and NextEra). We find that these Signatories represent a broad spectrum of interests and that there is no disenfranchisement or appearance of disenfranchisement. We thus conclude that the first criterion for approval of a stipulation has been satisfied here.

C. Was the Process That Led To The Stipulation Fair?

In deciding whether the process that led to the Stipulation was fair, the entire process must be looked at as a whole. See, *Verizon AFOR*, Order Approving Stipulation at 9. FOMM does not assert that the process was unfair, and we conclude, for the following reasons, that the process leading to the Stipulation was fair. All of the

technical conferences held were noticed, and FOMM's attorney participated in most of them. Further, all settlement discussions were noticed as well. Finally, the process established by the Hearing Examiner allowed those parties who were not signatories to the Stipulation to file written objections and also provided such parties with an opportunity to be heard. Although FOMM did not request a hearing, the Commission held oral argument in which FOMM's attorney participated. We find that the overall process, including the process provided by the discovery schedule and opportunity for filing testimony, noticed settlement conferences, and process subsequent to the presentation of the Stipulation, was fair and that the Commission's second criterion has been satisfied.

D. Is The Stipulated Result Reasonable, Consistent With The Public Interest and Relevant Statutory Mandates?

As discussed above, in order to issue a CPCN authorizing the construction of a transmission line, the Commission must find a public need for the line, and the definition of public need under Section 3132 and chapter 330 looks at ratepayer benefits. However, the term "ratepayer benefits" is a broad term that does not require the Commission to select the lowest cost alternative, if there is justification for a reasonable cost increase.

The question of whether a transmission line will provide benefits to the public utility's ratepayers must be analyzed in the context of the circumstances that exist at the time of the determination. In this regard, we note the Maine Legislature has directed the Commission to consider state renewable energy generation goals in considering public need. In addition, the Legislature has found that it is in the public interest to encourage the development of wind energy production and that wind energy production needs to be incorporated into the existing energy supply and transmission systems in a way that achieves system reliability, total capital cost-effectiveness and optimum short-term and long-term benefits to the people of Maine. 35-A M.R.S.A. §§ 3402 and 3404.

We conclude there is an electrical need based on (1) the requirement to eliminate the significant adverse impact caused by the Heywood Road Switchyard and (2) low voltage problems under certain contingencies and conditions, most notably high net load at the Sappi Somerset facility (i.e. with a certain level of Sappi generation out). The elimination of the significant adverse impact requirement derives from Sections I.3.9 and I.3.10 of the ISO-NE Open Access Transmission Tariff (OATT) under which ISO-NE will determine whether a new transmission or generation facility will cause a significant adverse impact on the transmission system. If ISO-NE determines that the proposed facility will have a significant adverse impact, the entity whose facility will cause the adverse impact has to take "such action or constructs at its expense such facilities as the ISO determines to be reasonably necessary to avoid such adverse effect." ISO-NE OATT § I.3.10

ISO-NE's approval for the Heywood Road Switchyard contained a requirement that CMP remove the significant adverse impact that the facility caused.

This significant adverse impact was an increased level of thermal overloads (thus reducing transfer capability). Either the Section 83 re-rate or Section 241 would remove the adverse impact by reducing the thermal overloads and thus increasing transfer capability to a level sufficient to remove the significant adverse impact.

We further find that Section 241 has additional benefits that enhance reliability and advance state policy in favor of cost-effective development of renewable generation. Section 241 adds a fourth 115 kV transmission line into the Waterville-Winslow area, which will benefit consumers in that area by reducing the likelihood of load interruptions during certain contingency events. Further, we find that Section 241 provides 18 MW greater transfer capability than the Section 83 re-rate, and the Western Area study shows that with small incremental steps such as addressing stuck breakers and rebuilding short transmission line sections, an additional 107 MW of export capacity could be achieved. Bench Analysis at 22. In addition, we find that line loss savings that are projected to result from the construction of Section 241 may provide a benefit (albeit, perhaps a modest one) to New England consumers as a whole in the reduction in the amount of capacity that is required to be purchased, thereby potentially reducing the cost of meeting the ISO-NE installed capacity requirement. Finally, an additional benefit from Section 241 is that a portion of the existing Section 241 from Heywood Road to Rice Rips that is not non-PTF will become PTF, which means that the cost of that portion of the line will be recovered regionally rather than locally.

As discussed below, we reject both of FOMM's arguments and instead find that the Stipulation meets the requirements for approval of a contested stipulation and is consistent with our statutory obligations under Section 3132 of Title 35-A.

#### 1. NTA Analysis

We reject FOMM's argument that the CPCN should be denied because of the absence of an NTA analysis. CMP explained in its Petition why an NTA analysis would not make sense in this case. CMP stated that the only NTA that would address the need for construction of Section 241 would be to add load behind the Wyman Hydro export constraint. However, CMP noted that it could not force the location of customers. CMP further noted that adding generation behind the Wyman Hydro interface would further exacerbate the export constraint and adding generation to the south and east of the interface would not reduce line flows over the constrained interface. The Bench Analysis concurred that an NTA is not feasible in this case.

During the process of this case through discovery, technical conferences, and opportunities to file testimony, no party, including FOMM, requested that CMP perform an NTA analysis. FOMM's proposal at the end stage of this case that backing down generation should be considered an NTA is not sufficiently developed. Nor is the record clear that such an NTA would meet the reliability requirement to remove the significant adverse effect of the Heywood Road Switchyard. Under section I.3.10 of the ISO-NE OATT, ISO-NE has the authority to determine what action must be

taken or facility must be built to remove the significant adverse impact. There is no indication in the record that ISO-NE would consider backing down generation an action that would remove the adverse impact. For these reasons, we find an NTA analysis is not feasible. Therefore, the absence of an NTA analysis in this case does not preclude our approval of the Stipulation.

## 2. Cost Allocation

FOMM's assertion that the Order in *Record Hill* provides a basis for allocating costs to Highland Wind is incorrect. In *Record Hill*, the transmission upgrade was needed to reduce the significant adverse impact that would be caused by the interconnection of the Record Hill wind generating facility to the transmission system. Therefore, Record Hill was responsible for the cost of the upgrade under ISO-NE tariff Schedule 22 which incorporates the Large Generator Interconnection Procedures for the New England region. *Record Hill* at 6. However, the requirement to remove the adverse impact (in decreased transfer capability) from the construction of the Heywood Road switchyard is not causally connected to the interconnection of Highland Wind. Because the adverse impact here is not caused by the interconnection of Highland Wind, Schedule 22 is not applicable.

Further, FOMM's statement that "incremental benefits of Line 241 relate to private generators" FOMM Objection at 8, is not accurate. We find that Section 241 provides reliability benefits in terms of improved and more flexible operation of the transmission system and in the advancement of the state policy in favor of renewable generation. And, as discussed above, these factors may be considered in determining need under section 3132 of Title 35-A.

## 3. Additional Statutory Requirements

Subsection 3132(6) of Title 35-A, directs the Commission to consider other factors, in addition to reliability, economics, NTAs and renewable resources. Specifically, the Commission is required to take into account public health and safety, scenic, historic and recreational values, and the proximity of the proposed transmission line to inhabited dwellings. With regard to health and safety as related to electromagnetic fields, the Petition contains a discussion of this issue. The Petition states that Section 241 will reduce magnetic field strength compared to the existing system because Section 241 would add a fourth path for current in addition to the three transmission lines connecting from the Wyman Hydro switchyard to the load areas south and east. These lines are Sections 63, 83, and 66. CMP states that "each of these lines will carry less current and therefore produce less magnetic field strength. As a result, Section 241 will reduce magnetic field strength along the Section 63, 83, and 66 corridors compared to today." Petition at 28.

With regard to proximity of the line to an inhabited dwelling, two parties, Debra Stanford and Robert Harrison, have raised concerns about the impact of the proposed line on property they own in Moscow which is in close proximity to CMP's

right of way. They requested that the ombudsman for the MPRP case help them work through concerns with CMP if the Section 241 CPCN is granted. The Stipulation contains the Signatories' agreement for the use of the ombudsman procedures to address landowners' concerns. Our approval of the Stipulation and our direction for the MPRP ombudsman procedures to be extended to landowners abutting the Section 241 line address Ms. Stanford's and Mr. Harrison's request, and we note that these parties did not object to the Stipulation. The record does not include any information that demonstrates that Section 241, which will be constructed in an existing right of way, will have any impact on historic and recreational values.

Based on the discussion above, we find the stipulated result will improve the reliability of Maine's transmission system, and supports the State's goals of the promotion of wind generation development in the State. We further find that given the range of estimated incremental costs for Section 241 over re-rating section 83, Section 241 provides the more reasonable alternative, considering the additional benefits provided by Section 241. For these reasons, and based on the discussion above, we find that the overall stipulated result is reasonable and consistent with the public interest, and that the Stipulation's provisions are consistent with all legislative mandates.

Accordingly, we

1. APPROVE the Stipulation submitted by CMP on June 22, 2011. A copy of the Stipulation is attached hereto and marked as Attachment A.
2. ISSUE, based on the Commission's approval of the Stipulation, a Certificate of Public Convenience and Necessity for the construction of Section 241 and associated substation elements as described in CMP's Petition.
3. DIRECT that the Ombudsman services, developed and provided in accordance with the Stipulation approved in Docket No. 2008-255, be made available to abutters on the Section 241 corridor.
4. DIRECT CMP to make annual filings relating to CMP's agreement to ensure that ratepayers receive the salvage value, if any, associated with transmission line facilities replaced or otherwise removed from service, in accordance with IV(3) of the Stipulation.
5. DIRECT CMP to seek Commission approval prior to any rebuild, such as a reconductoring and structure replacement (excluding re-rating or other routine maintenance) of Section 83, if such rebuild is planned to be constructed within ten years from the date of this Order.
6. DIRECT CMP to annually file for the next ten years from the date of this Order an annual report describing any routine maintenance upgrades or changes to Section 83 plant.

7. DIRECT CMP to file a report at the Commission if the cost of Section 241 and the associated substation work exceeds by 10% CMP's estimate of \$32.97 million. The report must document the cost expenditures and explain the reason for the cost overrun.

Dated at Hallowell, Maine, this 15<sup>th</sup> day of August, 2011.

BY ORDER OF THE COMMISSION



Karen Geraghty  
Administrative Director

COMMISSIONERS VOTING FOR: Vafiades  
Littell

## RIGHTS TO REVIEW OR APPEAL

5 M.R.S.A. § 9061 requires the Public Utilities Commission to give each party to an adjudicatory proceeding written notice of the party's rights to review or appeal of its decision made at the conclusion of the adjudicatory proceeding. The methods of review or appeal of PUC decisions at the conclusion of an adjudicatory proceeding are as follows:

1. Reconsideration of the Commission's Order may be requested under Section 1004 of the Commission's Rules of Practice and Procedure (65-407 C.M.R.110) within **20** days of the date of the Order by filing a petition with the Commission stating the grounds upon which reconsideration is sought.
2. Appeal of a final decision of the Commission may be taken to the Law Court by filing, within **21 days** of the date of the Order, a Notice of Appeal with the Administrative Director of the Commission, pursuant to 35-A M.R.S.A. § 1320(1)-(4) and the Maine Rules of Appellate Procedure.
3. Additional court review of constitutional issues or issues involving the justness or reasonableness of rates may be had by the filing of an appeal with the Law Court, pursuant to 35-A M.R.S.A. § 1320(5).

Note: The attachment of this Notice to a document does not indicate the Commission's view that the particular document may be subject to review or appeal. Similarly, the failure of the Commission to attach a copy of this Notice to a document does not indicate the Commission's view that the document is not subject to review or appeal.

ATTACHMENT A

STIPULATION



**CENTRAL MAINE  
POWER**

**THIS IS A VIRTUAL DUPLICATE OF THE ORIGINAL HARD COPY SUBMITTED TO  
THE COMMISSION IN ACCORDANCE WITH ITS ELECTRONIC FILING  
INSTRUCTIONS**

June 23, 2011

Karen Geraghty  
Administrative Director  
Maine Public Utilities Commission  
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242 State Street  
Augusta, Maine 04333-0018

Re: CENTRAL MAINE POWER COMPANY, Request for Certificate of Public  
Convenience and Necessity for the Somerset County Reinforcement Project  
Consisting of the Construction of Approximately 39 Miles of 115 kV Transmission  
Lines ("Section 241"), Docket No. 2010-180

Dear Ms. Geraghty:

Enclosed for filing in the above-captioned proceeding please find the executed Stipulation  
resolving all issues in this proceeding.

Sincerely,

Debra J. Mills  
Analyst, Regulatory Administration

cc: All Parties

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**IBERDROLA  
USA**



STATE OF MAINE  
PUBLIC UTILITIES COMMISSION

Docket No. 2010-180

June 23, 2011

CENTRAL MAINE POWER COMPANY, )  
Request for Certificate of Public Convenience )  
and Necessity for the Somerset County )  
Reinforcement Project Consisting of the ) STIPULATION  
Construction of Approximately 39 Miles of 115kV )  
Transmission Lines ("Section 241") )

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Central Maine Power Company ("CMP" or "Company"), the Office of the Public Advocate ("OPA"), the Conservation Law Foundation ("CLF"), Highland Wind, LLC, the Penobscot Indian Nation, , NextEra Energy, Maine Renewable Energy Association, (collectively, the "Parties") hereby agree and stipulate as follows:

**I. PURPOSE**

The purpose of this Stipulation is to achieve an agreed-upon resolution of CMP's petition for a Certificate for Public Convenience and Necessity ("CPCN") for the Somerset County Reinforcement Project ("Section 241") to construct a new 115kV electric transmission line in central Maine originating at Wyman Hydro Substation in Moscow and terminating in Benton, Maine. The estimated cost of Section 241, with 98% of the cost of the project secured through a competitive bid, is \$32.97 million.

The new line is needed to address local reliability needs in the Skowhegan-Waterville-Winslow area..

The provisions agreed to herein have been reached as a result of information presented in this proceeding and gathered through discovery and discussions among the Parties in this proceeding.

## II. PROCEDURAL BACKGROUND AND SUMMARY OF FILINGS

On August 2, 2010, pursuant to Chapters 330 and 110, Part 6 of the Commission's rules and 35-A M.R.S. § 3132, CMP filed a Petition for a Certificate of Public Convenience and Necessity to construct a new 39-mile 115 kV electric transmission line in central Maine originating at Wyman Hydro Substation in Moscow and terminating at Benton, Maine ("Petition"). The Petition identified specific reliability and transfer capability needs in the local Somerset county area including the surrounding towns of Benton, Clinton, Waterville and Winslow. The Petition discussed two options to address the problems— construction of Section 241 or a rebuild of Section 83. The Petition states that Section 241 is CMP's preferred option in that it provides enhanced reliability over the re-rating option specifically by increased longevity, improved operability and also provides substantially greater export capacity as compared to the Section 83 re-rate. CMP also claims that Section 241 is the least-cost option when taking into account line loss savings that will occur with a Section 241 rebuild.

Petitions to Intervene were filed and granted for the Office of the Public Advocate, Blue Sky West, GridSolar, IECG, Maine Renewable Energy Association, NextEra, Conservation Law Foundation, Deborah Stanford and Robert Harrison, Highland Wind, Friends of Maine's Mountains, the Penobscot Indian Nation, and ISO-NE.

To fulfill its obligation to perform a comprehensive study of the Western Maine transmission system as required by the Commission's June 10, 2010 Order in Docket No. 2008-255, on December 22, 2010, CMP filed Western Maine Preliminary Findings. Then, on February 18, 2011, the Company filed its Confidential Western Maine Renewable Integration Study. Among other things, the Study determined that Section 241 would provide a stepping stone to

transmission measures that may eventually be needed to accommodate the integration of additional wind generation in Western Maine.

On May 12, 2011, the Advisory Staff issued its Bench Analysis. The Bench Analysis agrees that there is a reliability need that must be addressed by a transmission upgrade. The Bench Analysis agrees that Section 241 increases transfer capacity to a greater degree than would a re-rate of Section 83. The Bench Analysis also agrees that Section 241 provides a stepping stone to possible transmission expansion to accommodate additional wind generation that may be built in Western Maine. The Bench Analysis does not agree that the evidence supports CMP's claim that Section 241 is the least cost transmission upgrade. The Bench Analysis does not take a position which of the two options is preferred.

On May 26, 2011, Rebuttal Testimony was submitted by Bryan Griffin/Mike Belanger and David Conroy/Ricky Conant on behalf of CMP. CMP supplied updated cost information in that testimony and follow-up data responses relating to the cost of the Section 83 re-rate and other components that would be needed with a Section 83 re-rate. CMP's Rebuttal Testimony maintained that the costs to construct Section 241 are very similar to the cost of a Section 83 re-rate. CMP also maintained that the line losses that would be achieved with Section 241 would weigh in favor of construction the Section 241 line. CMP also highlighted the technical benefits of Section 241 over a re-rating of Section 83 and the fact that Section 241 has been approved for regional cost sharing. CMP maintained that regional cost sharing of a Section 83 re-rate should not be assumed. Rebuttal Testimony was also filed by Abigail Krich for Highland Wind recommending the approval of Section 241.

Over the course of this proceeding, CMP has responded to nearly 100 data requests and has participated in 6 Technical Conferences related to each of the filings in this case.

### **III. RECORD**

The record established thus far in this case provides ample information on which the settling Parties and the Commission may base their conclusions. These materials include:

- CMP's Petition for Certificate of Public Convenience and Necessity and supporting materials;
- CMP's Western Area Study;
- Rebuttal testimony submitted by CMP;
- Rebuttal testimony submitted by Highland Wind;
- Documents and information provided in response to written and oral data requests;
- Transcripts of the Technical Conferences;
- Bench Analysis.

### **IV. PARTIES AND SETTLEMENT PROCESS**

To accept a stipulation, the Commission must find that:

- a. the Parties joining the stipulation represent a sufficiently broad spectrum of interests that the Commission can be sure that there is no appearance or reality of disenfranchisement;
- b. the process that led to the stipulation was fair to all Parties;
- c. the stipulated result is reasonable and is not contrary to legislative mandates; and
- d. the overall stipulated result is in the public interest.

The undersigned Parties believe that each of these factors is satisfied here. The Parties joining this Stipulation represent a broad spectrum of interests and the vast majority of the active participants in this docket.

The process that achieved this Stipulation was fair to all Intervenors and all Intervenors had the opportunity to participate. Specifically, this Stipulation was the product of a noticed, public settlement conference on June 7, 2011 and informal discussions by various parties throughout the proceeding.

Finally, as discussed above, the stipulated result is reasonable, supported by the extensive record in this proceeding, consistent with Maine's legislative mandates, and in the public interest.

## **V. RECOMMENDED APPROVALS AND FINDINGS**

### **A. Certificate of Public Convenience and Necessity**

Based upon the record in this case, the Parties agree that a reliability need exists in the Waterville-Winslow-Skowhegan area, and that the reliability need could be met by either Section 241 or a re-rate of Section 83 (with certain additional transmission facilities). The Parties further agree that Section 241 will provide certain benefits compared to a re-rate of Section 83. Specifically, the Parties agree that Section 241 will provide: (i) a more robust system that results in increased flexibility for operating the system; (ii) greater longevity; (iii) greater area export capability; and (iv) a transmission system element that is beneficial in the context of potential additional transmission expansion measures that may be needed to accommodate the integration of additional renewable generation in Western Maine. In addition, the construction of Section 241 has an additional benefit to Maine ratepayers in that a portion of the existing Section 241 from Heywood Road to Rice Rips that is now non-PTF will become PTF. The Parties further agree that the incremental costs for Section 241 compared to the Section 83-re-rate are within a range of approximately \$2 million to 8.5 million in total, and that the incremental cost, at an 8% load-ratio share, is estimated to not exceed \$680 thousand. The

Parties agree that such incremental costs are justified by the factors listed above. Therefore, the Parties conclude that building Section 241 is the best transmission alternative and recommend that the Commission issue an order which approves, accepts and adopts this Stipulation and grants a CPCN to CMP in accordance with the following terms:

1. CMP is authorized to build Section 241 and associated substation elements as described in CMP's Petition. The estimated cost of Section 241, with 98% of the cost of the project secured through a competitive bid, is \$32.97 million.
2. Ombudsman services, will be extended to abutters on the Section 241 corridor. These services shall be consistent with those provided in Docket No. 2008-255.
3. CMP agrees prospectively to ensure that ratepayers receive the salvage value, if any, associated with transmission line facilities replaced or otherwise removed from service, including MPRP facilities, and to provide additional transparency in the treatment of transmission line salvage costs and how ratepayers are receiving this value, if any is generated. Further, CMP agrees to make an annual information filing at the Commission, at the time of the informational transmission rate filing CMP makes at the Federal Energy Regulatory Commission, that identifies (1) rebuilds or other projects, that involve removal, replacement or salvage of transmission equipment during the test year, (2) the estimated salvage value of that equipment, (3) the value received by CMP and (4) the ratemaking treatment of that value. To the extent that CMP has entered into, or in the future enters into, transmission and substation construction contracts that contain provisions addressing salvage and these provisions contain explicit provisions relating to contractors retaining the value of the salvage, CMP's documentation of these provisions

in the informational filing will constitute compliance with the informational filing requirement. CMP further agrees to submit a compliance filing in this proceeding, making such a demonstration, once the applicable construction contract terms have been secured.

4. Notwithstanding the requirements of 35-A M.R.S.A. §3132, CMP will not rebuild Section 83 in the next ten years without first seeking Commission approval for such a rebuild. This requirement shall apply to any project involving a re-conductoring and structure replacement of Section 83, but will not apply to a re-rating or other routine maintenance of Section 83.
5. CMP agrees to file, for the next ten years, an annual report describing any routine maintenance upgrades or changes to Section 83 plant.
6. To the extent that the cost of Section 241 exceeds by 10% the estimate set forth in paragraph V(A)(1) above, CMP agrees to file a report at the Commission, documenting the cost expenditures and explaining the reason for the cost overruns.

## VI. PROCEDURAL STIPULATIONS

1. Staff Presentation of Stipulation. The Parties to this Stipulation hereby waive any rights that they have under 5 M.R.S. § 9062(4) and Section 742 of the Commission Rules of Practice and Procedure to the extent necessary to permit the Advisory Staff to discuss this Stipulation and the resolution of the issues addressed in this Stipulation with the Commissioners, either before or at the Commission's scheduled deliberations.

2. Stay. In the event that the Commission or a court of competent jurisdiction stays the effectiveness of any provision of this Stipulation pending an appeal or otherwise, then the

obligations of all Parties under the terms of this Stipulation are suspended until such stay order is vacated or rescinded.

3. Non-Opposition. All Parties to this Stipulation agree not to oppose directly or indirectly Section 241 before any regulatory agency, permitting authority, municipality, court or other entity with approval authority concerning any aspect of Section 241, including, without limitation, the Maine Department of Environmental Protection and the United States Army Corps of Engineers and agree to withdraw in writing within ten (10) days after the Commission's approval of this Stipulation any opposition to Section 241 previously filed with, or provided to, any such regulatory agency, permitting authority, municipality, court or other entity.

4. Record. The record on which the Parties enter into this Stipulation and on which the Commission may base its determination whether to accept and approve this Stipulation shall consist of this Stipulation, the items identified in Part III above, and any other material furnished by the Advisory Staff or the Parties to the Commission, either orally or in writing, to assist the Commission in deciding whether to accept and approve this Stipulation.

5. Non-Precedential Effect. This Stipulation shall not be considered legal precedent, nor shall it preclude a party from making any contention or exercising any rights, including the right of appeal, in any future Commission investigation or proceeding or any other trial or action.

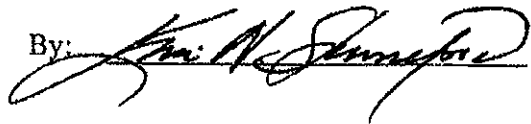
6. Stipulation as Integrated Document. This Stipulation represents the full agreement between the Parties to the Stipulation and rejection of any part of this Stipulation constitutes a rejection of the whole.

7. Void if Rejected. If not accepted by the Commission in accordance with the provisions hereof, this Stipulation shall be void and of no further effect and shall not prejudice

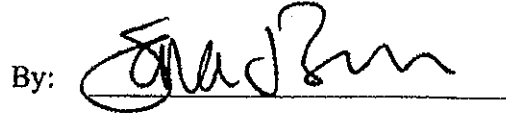
any position taken by any party before the Commission in this proceeding and shall not be admissible evidence therein or in any other proceeding before the Commission.

Respectfully submitted this 22<sup>nd</sup> day of June, 2011.

Central Maine Power Company

By: 

Central Maine Power Company

By: 

Office of Public Advocate

By: \_\_\_\_\_

Conservation Law Foundation

By: \_\_\_\_\_

Highland Wind, LLC

By: \_\_\_\_\_

Penobscot Indian Nation

By: \_\_\_\_\_

any position taken by any party before the Commission in this proceeding and shall not be admissible evidence therein or in any other proceeding before the Commission.

Respectfully submitted this 20th day of June, 2011.


Central Maine Power Company

By: \_\_\_\_\_

Central Maine Power Company

By: \_\_\_\_\_

Office of Public Advocate

By:   
ERIC J. BRYANT

Conservation Law Foundation

By: \_\_\_\_\_

Highland Wind, LLC

By: \_\_\_\_\_

Penobscot Indian Nation

By: \_\_\_\_\_

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Respectfully submitted this \_\_\_th day of June, 2011.

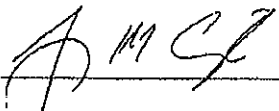
Central Maine Power Company

By: \_\_\_\_\_

Central Maine Power Company

By: \_\_\_\_\_

Office of Public Advocate

By:  \_\_\_\_\_

Greg Cunningham  
Senior Attorney  
Conservation Law Foundation

By: \_\_\_\_\_

Highland Wind, LLC

By: \_\_\_\_\_

Penobscot Indian Nation

By: \_\_\_\_\_

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Respectfully submitted this \_\_\_th day of June, 2011.

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By: \_\_\_\_\_

Central Maine Power Company

By: \_\_\_\_\_

Office of Public Advocate

By: \_\_\_\_\_

Conservation Law Foundation

By: \_\_\_\_\_

Highland Wind, LLC

By: Kimball L. Conway  
Kimball L. Conway  
Attorney for Highland Wind, LLC  
Penobscot Indian Nation

By: \_\_\_\_\_

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Respectfully submitted this \_\_\_th day of June, 2011.

Central Maine Power Company

By: \_\_\_\_\_

Central Maine Power Company

By: \_\_\_\_\_

Office of Public Advocate

By: \_\_\_\_\_

Conservation Law Foundation

By: \_\_\_\_\_

Highland Wind, LLC

By: \_\_\_\_\_

Penobscot Indian Nation

By:  \_\_\_\_\_

NextEra Energy

*Christopher I. Sherman*  
By: Christopher Sherman  
Director of Regulatory and  
Legislative Affairs

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Maine Renewable Energy Association

By: \_\_\_\_\_

NextEra Energy

By: \_\_\_\_\_

Maine Renewable Energy Association

By:  \_\_\_\_\_

Jeremy W. Payne  
Executive Director

**ATTACHMENT B**

**DESCRIPTION OF PROJECT,  
EXCERPTED FROM REDACTED  
PETITION**

### **Description of Type of Line and Transmission Line Design (Ch. 330, Para. (C))**

The proposed CMP 115 kV transmission line (the circuit designated as Section 241) will be a single-circuited single wood pole construction. The majority of structures will be constructed to CMP's standard structure types for 115kV single pole construction and will consist mostly of tangent single pole single circuit on davit arm. Structures will be spaced an average of approximately 450 feet apart.

In general, the structures will be directly embedded in the ground; however, where poor soil conditions are encountered or in situations where the Project cannot obtain guying rights, some structures may require a concrete caisson foundation.

The project will be utilizing 1113 Kcm 45/7 aluminum conductor/steel reinforced (ACSR) code name "Bluejay" with a diameter of 1.259 inches. The aerial shield wire is expected to be a fiber optical ground wire (OPGW) with a diameter of approximately 0.6 inches.

Guy wires will be used to support angle structures at locations where the direction of the line changes, where the line transitions from single pole to H-frame, and at dead-end structures.

Pole heights will vary depending on span length and terrain, but will generally average 70 to 80 feet. CMP expects to install approximately 465 structures in total for Section 241.

Depending on the terrain and right-of-way conditions H frame construction may be required as an alternate structure type or where dead end structures are required.

There are two taps to new Section 241 that will require specially designed structures. The first is for the Lakewood S/S tap (Section 83B). This tap will be reconfigured to tap new Section 241. The second location is at the junction of the current Section 241.

**D. Substation Modifications and Construction (Ch. 330, Para. 6(G))**

The termination of Section 241 at the Wyman Hydro Substation is a new 3-phase, 115 kV interconnect between Wyman Hydro Substation and Heywood Road Substation. The new termination at Wyman Hydro Substation will be constructed entirely within the existing fence line. The substation work shall include all 115 kV electrical equipment, structures, and foundations from the new transmission line termination to the bus side 115 kV breaker disconnect switch, and includes a parallel bus design, single phase bus CVT and switch. The Project includes a control house addition located on the south side of the existing control house and a new cable trench from the new 115 kV electrical equipment to the new control house addition.

The work at Heywood Road Substation is limited to the fiber-optic cable addition required for relay, protection, and control purposes.

**E. Description of Proposed Corridor (Ch. 330, Para. 6 (D), (G))**

Section 241 will be a new 115 kV transmission line originating at Wyman Hydro Substation and will run adjacent to existing Section 83 for approximately 21.4 miles to the Lakewood Substation Tap (Section 241B). The line will continue south easterly for approximately 7.9 miles where it crosses the Sappi Tap (Section 83C) and continues

approximately 9.4 miles where it will terminate at the Rice Rips Substation Tap (Section 241A). On the existing Section 241 in Benton, Section 241 will continue from here along its existing 2 mile segment to the Heywood Road Substation, while the segment of existing Section 241 to Rice Rips Substation will be renumbered as Section 241A. Where the new and existing portions of Section 241 meet is referred to as the Rice Rips Substation Tap.

In order to minimize environmental and landowner impacts the project is utilizing both cleared and uncleared right of way. Most of the line will be constructed 50' off of the right-of-way edge and parallel to the existing CMP 115 kV Section 83. Approximately 75' of additional clearing will be required because the existing right-of-way is not fully cleared.

#### **Wyman Hydro Substation to Lakewood Substation Tap (Section 241B)**

The northernmost portion of Section 241 begins at Wyman Hydro Substation, traverses generally in a south easterly direction for approximately 10.9 miles with existing corridor to where new Section 241 crosses over Sections 83 and 66 (where Section 66 and Section 83 diverge into separate corridors) and continues south easterly in existing corridor for approximately 10.5 miles to the new Lakewood Substation Tap (Section 241B).

#### **Lakewood Substation Tap (Section 241B) to Sappi Tap (Section 83 C)**

Section 241 will continue in a southeasterly direction for approximately 7.9 miles to where it crosses Sappi Tap (Section 83C). This segment will continue to utilize existing corridor, and will be built on the westerly side, 50 feet from the edge of the existing right-of-way.

**Sappi Tap (Section 83C) To Rice Rips Substation Tap (Section 241A)**

Section 241 will continue south easterly within the existing corridor for approximately 8.8 miles where it will come to the I-95 crossing. In order to minimize span length at the I-95 crossing Section 241 will follow Section 83 where it crosses the Interstate, and will then parallel Interstate right-of-way (about 0.3 mile). The crossing will be done by using 3 pole dead end structures placed on both sides of the Interstate. Additional clearing rights may be required in the area of the crossing to accommodate Section 241. The line then continues in a southeasterly direction for approximately 0.3 miles and will end where Rice Rips Substation Tap meets Section 241.