

**UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION**

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Rumford Falls Hydro LLC,)	
Rumford Falls Hydroelectric Project)	P-2333-094
)	

MOTION OF ND PAPER INC. TO INTERVENE

ND Paper Inc. (“ND Paper”) respectfully submits this motion to intervene, pursuant to 18 C.F.R. § 385.214, in this proceeding in support of the issuance of a new major license for the Rumford Falls Hydroelectric Project (the “Project”) on the same terms as are required by the Project’s present license.

I. INTERESTS OF INTERVENOR

ND Paper owns and operates the Rumford Mill, an integrated pulp and paper mill located along the Androscoggin River in Rumford, Maine. Founded as the Oxford Paper Company in 1901, the Rumford Mill has produced some of the most reputable products in the history of the American paper industry. From the USPS’s penny post cards to Campbell Soup can labels to paper for the iconic L.L. Bean catalogue, the story of US retail, advertising and commerce has been woven throughout the mill’s vast facilities for over 120 years.

Dams and other facilities that now constitute the Project were originally constructed in the twentieth century to provide power to the Rumford Mill. The Rumford Mill site is adjacent to the Project. For over a century, the Rumford Mill has relied on water drawn from the Project’s impoundment for essential industrial operations.

Today, the Project and the Rumford Mill are under separate ownership. ND Paper purchased the mill in 2018 and has been investing in significant capital and market transformations at the mill over the ensuing years. At an operational level, the Rumford Mill continues to depend on the Project to maintain water levels sufficient for the Rumford Mill’s process and cooling water intakes. ND Paper’s interests in the Rumford Mill and its access to water supply may be directly affected by the outcome of this proceeding. ND Paper’s participation is further in the public interest.

II. POSITION OF INTERVENOR

ND Paper seeks to ensure continued access to this essential water supply. To ensure this access, through its participation in this proceeding, ND Paper also seeks to ensure that the Project remains operational on the same terms as are required by the Project's present license.

III. SERVICE

ND Paper respectfully requests that the following representatives be added to the service list in this proceeding:

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Dated: August 21st, 2023

Respectfully submitted,



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Counsel for ND Paper Inc.

CERTIFICATE OF SERVICE

_____)
 Rumford Falls Hydro LLC,)
 Rumford Falls Hydroelectric Project)
 _____)

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I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at 21st this day of August, 2023

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