

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

Brookfield White-Pine Hydro LLC
Application for Major New License
Rumford Falls Hydroelectric Project

Project No. P-2333-091

MOTION TO INTERVENE BY THE CONSERVATION LAW FOUNDATION

Pursuant to 18 C.F.R. §385.210 and §385.214, the Conservation Law Foundation (“CLF”) hereby moves to intervene in the above-captioned proceeding, initiated by Rumford Falls Hydro LLC, a subsidiary of Brookfield White-Pine Hydro LLC, which controls and operates the Rumford Falls Hydroelectric Project, FERC Project No. 2333-091 (“Rumford Falls Project”), a hydroelectric project on the Androscoggin River in Maine. CLF also seeks to join in the protest of the Rumford Falls Project hydroelectric application that has been filed with the Commission by the Maine Council of Trout Unlimited on August 4, 2023.

Founded in 1966, CLF is a non-profit advocacy organization with 5,000 members across New England, including approximately 500 in Maine. CLF works to solve the environmental problems threatening New England’s people, natural resources, and communities. CLF’s advocates use law, economics and science to design and implement strategies that conserve natural resources, protect public health, and promote vital communities in our region. CLF has members in many of the communities that border the Androscoggin River, including Brunswick, Lewiston, Auburn, Jay and Rumford, the site of the Rumford Falls Project.

For more than three decades, CLF has worked to restore habitat and recreational opportunities in New England’s coastal rivers for important species such as herring, alewives, shad and salmon. CLF’s work to restore key forage fish has stretched from the Connecticut River to the St. Croix River and is an integral part of our work to restore New England’s coastal and ocean fisheries.

Members of CLF use the Androscoggin River for recreational, educational, and aesthetic pursuits.

CLF members fish, boat and otherwise enjoy the watershed in the vicinity of the Rumford Falls Project. Further, CLF members have broad and deep organizational interests in the Commission's equal consideration of power and non-power values in hydropower licensing pursuant to Sections 4(e) and 10(a) of the Federal Power Act ("FPA").

CLF is engaged on Androscoggin River fisheries and dam issues in collaboration with the Maine Council of Trout Unlimited, a group that has been working since early 2019 to restore stream connectivity and improve water quality within the Androscoggin River watershed. This collaboration will include CLF joining in the Protest filed by the Maine Council of Trout Unlimited in this proceeding.

This history fully demonstrates CLF's and its members' direct and substantial interest in the outcome of the hydroelectric application that has been filed with the Commission for the Rumford Falls Hydroelectric Project FERC No. 2322-091.

For the foregoing reasons, Conservation Law Foundation should be permitted to intervene with full rights in this proceeding.

Service of process and other communications in this matter should be addressed to:

Sean Mahoney
Conservation Law Foundation
53 Exchange St, Suite 200
Portland, ME 04101
(207) 210-6439
smahoney@clf.org

Respectfully submitted,

A handwritten signature in blue ink that reads "Sean Mahoney". The signature is written in a cursive style with a large, sweeping "S" and "M".

Sean Mahoney, Esq.
Senior Counsel and Vice President
CLF Maine

Dated: August 25, 2023

Document Content(s)

CLF Motion to Intervene - Rumford Falls Project - Final 8.25.23.pdf.....1