

**STATE OF MAINE
PUBLIC UTILITIES COMMISSION**

CENTRAL MAINE POWER COMPANY

Request for Approval of Rate Case Filing

Docket No. 2026-00043

**NATURAL RESOURCES
COUNCIL OF MAINE, ACADIA
CENTER, AND CONSERVATION
LAW FOUNDATION JOINT
COMMENTS IN SUPPORT OF
RECOMMENDED DECISION**

October 5, 2026

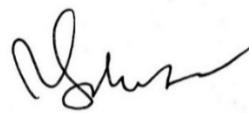
The Natural Resources Council of Maine (NRCM), Acadia Center, and Conservation Law Foundation (CLF) jointly submit the following comments in support of the Presiding Officers' Recommended Decision on Temporary Rates filed September 28, 2026, in the abovementioned proceeding. We agree with the arguments presented by the Office of the Public Advocate in its September 4, 2026, and October 2, 2026, filings on this issue. We find that the Presiding Officers have reasoned their position soundly and judiciously in concluding that: 1) the entire requested rate increase is in fact in dispute, and 2) the precedent set in *The Me. Water Co. – Biddeford & Saco Div., Request for Approval of Rate Increase*, No. 2023-00065, Order (Aug. 25, 2023) (*MWC*) should lead the Commission to use its discretion and deny temporary rates. We urge the Commission to adopt the Recommended Decision as its final order.

Additionally, we find the statements made in CMP's Exceptions to the Recommended Decision filed on October 2, 2026, to be as troubling as they are revealing. CMP's argument for temporary rates rest on its desire to "protect the Company's credit metrics." Policy Test. at 3. Meanwhile, between 2022 and 2025, the Company exceeded its forecasted capital additions by 50.1%. Bench Analysis at 10. As a result, the Company *put itself* into a "profoundly impaired financial condition", which it identifies as having earned an ROE lower than its authorized ROE.

Policy Test. at 3. In its Exceptions to the Recommended Decision, CMP states that, without temporary rates to expedite recovery of spending before April 2027, it “will be forced to defer...specific reliability and safety investments” necessary to furnish safe, reliable, and adequate facilities and service to Maine customers. CMP Exceptions at 2. Yet staff’s expert, Dr Randall Woolridge, testified to the opposite effect: “[CMP’s] credit ratings are a couple of notches above other electric utilities. So they could afford to be downgraded and still be lower risk than most electric utilities.” Aug 27, 2026, Technical Conference in Docket No. 2026-00043, Transcript p 26 at 23. Any risk to ratepayers of CMP’s facing higher borrowing costs appears overstated and certainly would not justify the company reneging on its legal obligation to provide safe, reliable, and adequate service. We encourage the Commission to make clear that this apparent retaliatory behavior is not acceptable.

NRCM, Acadia Center, and CLF appreciate this opportunity to provide input and thank the Commission for its consideration of our support for the Recommended Decision.

Respectfully submitted,



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A handwritten signature in blue ink that reads "Sean Mahoney". The signature is stylized, with the first name "Sean" written in a cursive-like script and the last name "Mahoney" in a more formal, slightly cursive script.

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