



Central Maine Power

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

October 7, 2008

Karen Geraghty
Administrative Director
Maine Public Utilities Commission
State House Station #18
242 State Street
Augusta, Maine 04333-0018

Re: CENTRAL MAINE POWER COMPANY and PUBLIC SERVICE COMPANY
OF NEW HAMPSHIRE, Request for Certificate of Public Convenience and
Necessity for Maine Power Reliability Program Consisting of Construction of
Approximately 350 miles of 345 kV and 115 kV Transmission Lines
Docket No. 2008-255

Dear Ms. Geraghty:

Enclosed for filing in the above-captioned proceeding is Central Maine Power
Company's Opposition to Industrial Energy Consumer Group's Motions to Continue and
Compel and the Yarmouth Intervenors' Motion to Continue.

Sincerely,

Debra J. Mills
Analyst, Regulatory & Tariffs

cc: All Parties

An equal opportunity employer

83 Edison Drive | Augusta, ME 04336

tel (207) 623-3521

www.cmpco.com

An Energy East Company

STATE OF MAINE
PUBLIC UTILITIES COMMISSION

Docket No. 2008-255

October 7, 2008

CENTRAL MAINE POWER COMPANY and)	CENTRAL MAINE POWER
PUBLIC SERVICE OF NEW HAMPSHIRE)	COMPANY'S OPPOSITION TO
Request for Certificate of Public Convenience)	INDUSTRIAL ENERGY CONSUMER
and Necessity for the Maine Power Reliability)	GROUP'S MOTIONS TO CONTINUE
Program Consisting of the Construction of)	AND COMPEL AND THE
Approximately 350 Miles of 345 kV and 115 kV)	YARMOUTH INTERVENORS'
Transmission Lines ("MPRP"))	MOTION TO CONTINUE

The Hearing Examiner should deny the Motions to Continue the technical conferences and permit them to go forward as scheduled. While CMP acknowledges that it was not able to answer all the discovery requests within the time set in the Procedural Order, Petitioners have now submitted more than 190 responses out of a total of 382, including 97 responses to requests from the Hearing Examiner and responses to the six data requests the Citizen Intervenors identified as crucial for questioning Petitioners' need and transmission solution witnesses, and will continue to provide responses to the remaining requests as soon as they are completed. The extraordinarily extensive and comprehensive material submitted with the Petition alone provides ample material for fruitful discussion at the technical conferences and these 190+ replies will provide additional guidance to the parties.

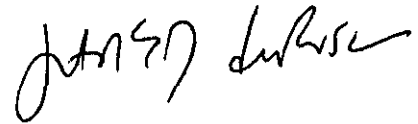
To the extent that, following the technical conferences, the Hearing Examiner concludes that Intervenors should be provided additional time to question Petitioners' witnesses based on the answers not provided prior to the conferences, Petitioners will, of course, make such witnesses available for further technical conference sessions.

The IECG's speculations concerning the reasons for the delay in the replies are simply untrue. CMP received the vast majority of the discovery requests on September 17, the very last

day discovery requests were due (and some requests after that date), and CMP has been working diligently to respond in the time since then, as reflected by the very substantial number of additional responses submitted this week. CMP regrets that its web-based service has not yet become operational; one significant reason for the delay is the complexity of a system that must accommodate a variety of protective orders that apply differently to different parties. CMP's choice of physical delivery was intended to ensure that, to the extent there were replies that might challenge the capacity of the Intervenors' computers (something that has happened in the past with respect to discovery replies), the Intervenors received all the available material. CMP has served its replies using overnight services, and beginning today will also use email until the web-based service is available.

CMP remains committed to staying within the current schedule, with a May 2009 decision by the Commission, and believes that the modest delays in its replies, coupled with the opportunities for reviewing the filing with the expert witnesses over the next two weeks, the subsequent informal discovery concerning modeling proposed by CMP, the local issues technical conferences, and additional technical conferences to the extent necessary, will provide all parties and the Commission with a full opportunity for a fair and thorough consideration of the Petition within the schedule as it currently stands. In any case, as the Hearing Examiner has indicated, decisions concerning the schedule beyond that set forth in the Examiner's Procedural Order of September 18, 2008 will be made following these technical conferences.

Dated: October 7, 2008.



Jared S. des Rosiers
Perce Atwood LLP
One Monument Square
Portland, ME 04101
(207) 791-1390

Counsel for Central Maine Power
Company