Maine Forest Products Council

The voice of Maine's forest economy

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December 30, 2025

VIA E-FILE

Debbie-Anne A. Reese, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

Re: Shawmut Hydroelectric Project
Comments on Notice of Application to Transfer License
Project No. P-2322-075

Dear Secretary Reese:

Please accept these comments on behalf of the Maine Forest Products regarding Brookfield White Pine Hydro LLC's Notice of Application to Transfer in the above-captioned docket.

For 65 years, the Maine Forest Products Council has served as the voice of Maine's forest economy, representing more than 300 members from all facets of Maine's forest products industry. Our members include pulp and paper mills, sawmills, secondary wood processors, foresters, biomass facilities, loggers, and truckers. We also represent commercial landowners sustainably managing more than 8 million acres of forestland.

We are writing to oppose Brookfield White Pine's application to transfer the license for the Shawmut Hydroelectric Project to Shawmut Holdco, LLC for the following reasons:

- Both Brookfield and The Nature Conservancy have made no secret of the fact that this proposed license transfer is the first step in a process that will result in the decommissioning of the Shawmut Dam. This would threaten the entire supply chain for our $8.3 billion forest industry[1]. Dam removal will deprive Sappi's Somerset Mill of sufficient water to operate, putting all 780 of its employees' jobs at risk. This will impact countless others who rely indirectly on the mill, and the loss of the largest wood consumer in the region would devastate Maine's heritage forest industry.

[1] 2024 Statewide Economic Contribution of Maine's Forest Products Sector

- Approving the license transfer would set decommissioning in motion before a viable engineering solution exists to meet the Sappi mill's operational needs. FERC should not allow this to proceed. To date, no such technological solution has been established.

- Approval of the license transfer before a technical solution has been established would have a chilling effect on critical investments in facilities and infrastructure for the forest products industry across the entire state. These investments are critical to the recovery of this industry.

- Brookfield White Pine asserts that revenue from power sales currently exceeds annual operating costs. However, this does not demonstrate that future power sales will be sufficient to cover ongoing expenses, required capital improvements, and eventual decommissioning. Power markets fluctuate, as do regulatory compliance costs, which Brookfield itself has cited as a reason for seeking to sell the dam in the first place.

- The proposed holding company, Shawmut Holdco, does not have the financial capacity to operate, maintain, or decommission the Shawmut Dam. It is unclear whether Brookfield White Pine will have any obligation to fund the holding company if revenues prove inadequate. And since the holding company appears to exist solely to convey the dam to The Nature Conservancy without further regulatory review, the Commission should scrutinize whether TNC itself has the financial capacity to see decommissioning through. TNC's reliance on anticipated fundraising is not sufficient to demonstrate that capacity. The Commission should not approve a transfer that leaves fundamental questions of financial responsibility unanswered.

- The proposed holding company also lacks the technical capacity to operate, maintain, or decommission the Shawmut Dam. Brookfield assumes its current employees will remain but offers no assurance they will. There is no guarantee that the holding company can retain qualified personnel once it becomes clear that their role is to dismantle the very facility they operate.

- Granting a license transfer to operate and maintain a dam to a holding company that does not even exist yet—and that expressly intends to decommission the dam rather than operate it—is reckless. Maine's heritage forest industry and the 29,000 livelihoods [1] that depend on it should not be subject to a corporate shell game.

Thank you for your consideration of these comments.

Sincerely,

Krysta West

Krysta West
Executive Director
Maine Forest Products Council