SEVEN-YEAR OUTLOOK:

AN ASSESSMENT OF THE ADEQUACY OF GENERATION AND TRANSMISSION FACILITIES ON THE NORTHERN MAINE TRANSMISSION SYSTEM

April 2026

INTRODUCTION

The Northern Maine Independent System Administrator ("NMISA") was created in 1999 in response to the mandate of the legislature of the State of Maine that effective retail electric competition be available to all of Maine's electricity consumers by March 1, 2000.[1] The NMISA's size, scope, purpose and electricity market were designed to facilitate the development and implementation of retail electric competition and foster regional reliability efforts in the electrically isolated area of the state in portions of Aroostook, Washington and Penobscot Counties. Northern Maine is characterized by low population density and very low electric demand in comparison with other electricity markets.

The dominant characteristics of the Northern Maine Market are its electrical isolation, large geographic size, small electric demand, and modest population. The electric system in Northern Maine is not directly interconnected electrically with the rest of New England, including any Maine or other domestic United States electric system. NMISA participants, therefore, are not participants in the New England Power Pool and are not subject to the control of ISO New England ("ISO-NE"). The region's only access to the electric system that serves the remainder of Maine and the rest of New England is through the transmission facilities of New Brunswick Power Corporation ("NB Power").[2] In October 2013, the New Brunswick System Operator ("NBSO") functions were merged into and amalgamated with functions of NB Power. The New Brunswick Transmission and System Operator ("NBT&SO") is the Balancing Authority and Reliability Coordinator ("RC") for the Balancing Authority Area that includes the Northern Maine and Maritimes regions.

The NMISA region is made up of the north, central, and south regions. The north region, or Versant Power Maine Public District ("MPD") region, central region, or Houlton Water Company ("HWC") region, and south region, or Eastern Maine Electric Cooperative ("EMEC") region, are interconnected solely through the transmission facilities of NB Power. The maximum peak demand for the NMISA region in 2025 was 154.1 MW for the combined regions, a 13% increase of the peak demand for 2024. The 2025 energy consumed was 864,696 MWh, a 1.80% increase from 2024. There are approximately 90,000 residents and approximately 42,000 electricity consumers in Northern Maine.

The NMISA is a Federal Energy Regulatory Commission ("FERC") approved independent system administrator and regional transmission group that encompasses the transmission systems of all FERC-jurisdictional and non-jurisdictional utilities in Northern Maine. The NMISA operates as an independent, objective and non-discriminatory administrator of transmission access, transmission information access, and related functions, and monitors and operates the electricity markets in Northern Maine for energy, ancillary services, and other services. The NMISA is governed by a seven-member stakeholder Board of Directors comprising representatives of MPD and EMEC, municipal utilities HWC and Van Buren Light & Power District ("VBL&P")), large customers, generators, Competitive Electricity Providers ("CEPs"),[3] and the Maine Public Advocate as representative of all other retail electric consumers.

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1 P.L. 1997 ch. 316, 35-A M.R.S.A. §§ 3201, *et seq.*

2 The NB Power transmission system connects to two 345 kV transmission lines, one of which is owned and operated by Maine Electric Power Company ("MEPCO"). MEPCO is jointly owned by Central Maine Power Company and Versant Power.

3 A CEP is any marketer, broker, aggregator or other entity that is legally entitled in the State of Maine to sell, and that is selling or that will sell, electric energy, capacity or Ancillary Services to the public at retail in the Northern Maine Market. A CEP includes only competitive electricity providers as they are defined under 35-A M.R.S.A. § 3201.5.

A tariff and the Northern Maine Market Rules ("NMMRs") govern the NMISA. NMMR 9, System Planning, sets forth provisions relating to the responsibilities of the NMISA, Transmission Owners ("TOs"), Demand-Side Management ("DSM") program operators/providers, and Generators in relation to the adequacy and reliability of the Northern Maine Transmission System ("NMTS"). NMMR 9.2 -- Long-Term System Planning-- states that the NMISA will prepare a Base Case for the planned development of the NMTS for the following seven years, beginning April 1 of each year. The Base Case comprises four sections: Load Forecast, Generation Resources, Resource Adequacy, and Transmission Planning.

LOAD FORECAST

The load forecast for the region includes the combined loads of MPD, HWC, EMEC, and VBL&P. The average annual load growth for energy (MWh) from 2001 to 2025 was 0.39%. The peak demand (MW) annual load growth for same period was .60%. Both exclude the Perth Andover load in New Brunswick that is fed from the NMTS. Perth Andover was part of the NMISA system until January 1, 2005, when the NBSO assumed responsibility for that load.

The forecast used in the Base Case includes an annual load growth of 0.5%, resulting in 2026 projected energy load of 869,019 MWh. The remainder of the period was simply escalated by 0.5% per year. The peak load for each year was calculated using the same growth factor for energy.

Table 1 reflects the seven-year forecast.

Table 1
NMISA 7-Year Load Forecast

Year	MWh	Peak
2026	869,019	154.9
2027	873,364	155.7
2028	877,731	156.4
2029	882,120	157.2
2030	886,530	158.0
2031	890,963	158.8
2032	895,418	159.6

GENERATION RESOURCES

A. CURRENT RESOURCES

Table 2 (below) lists the generation resources located on the NMTS. In the MPD region the generation consists of wind, solar, and hydropower facilities.

In the EMEC region there is 20 MW of Black Liquor/Biomass/NG capacity available from Woodland Pulp, a local paper mill.

Table 2
NMISA Generation Resources

Plant	Capacity (MW)	Type	Status
Tinker Station			
Hydro #1	4.0	Hydro	Existing
Hydro #2	1.8	Hydro	Existing
Hydro #3	1.8	Hydro	Mothballed
Hydro #4	4.0	Hydro	Existing
Hydro #5	23.0	Hydro	Existing
Caribou Station			
Hydro #1	0.5	Hydro	Mothballed
Hydro #2	0.5	Hydro	Mothballed
Other Resources			
Evergreen Wind	42.0	Wind	Existing
Woodland Pulp	20.0	BLQ, Biomass, NG	Existing
Distributed Generation*	108.44	Solar, Hydro	Existing

** See Exhibit 1*

B. RETIREMENTS

In September of 2017 ReEnergy notified the NMISA that it intended to mothball the two biomass plants. In November of 2018 the Fort Fairfield facility ceased operation and was retired. The Ashland facility ceased operation in March of 2019 and the facility was retired in October of 2019, both facilities have been dismantled and all equipment has been removed from the site. Both units have been removed from all NMISA planning criteria.

In July of 2019 Merlin One notified the NMISA that it intended to retire the Caribou Steam Station and Caribou Diesel Station effective August 1, 2019. Both units have been removed from all NMISA planning criteria.

C. PROPOSED RESOURCE ADDITIONS

There are no projects under study through MPD's Large Generator Interconnection Procedure. For more information see the following link: https://www.versantpower.com/oasis/ .

As a result of recent changes in Maine state law related to solar energy projects and Distributed Energy Resources ("DER"), there are several projects requesting interconnection to the MPD distribution system. At the time of this report, there are approximately 18 MW in the MPD queue. NMISA is working with developers, the Maine Public Utilities Commission ("MPUC"), MPD, and NB Power to ensure NMISA Reliability Standards are maintained as new projects are added, and to ensure all project developers (or their designee) operate in accordance with the NMMRs. Follow the links below for more information:

MPUC Chapter 311, Chapter 312, and Chapter 313
https://www.maine.gov/mpuc/legislative/laws-rules

Versant Power Distribution Interconnection Queue
https://www.versantpower.com/docs/default-source/interconnection/interconnection_request_queue-mpd.pdf?sfvrsn=21c7f2fc_47

In the summer of 2021 Versant Power, in coordination with the NMISA, commissioned a System Impact Study ("Study") under the Versant Power Open Access Transmission Tariff for Maine Public District Attachment S – Standard Small Generator Interconnection Procedures. The Study tested the steady state, dynamic, and short circuit system performance of a 113 MW DER generation cluster. This cluster represented 37 DER facilities that interconnect into Versant's distribution and sub-transmission systems in the MPD service territory. The objective of the study was to demonstrate that these projects will not have a significant adverse effect upon the reliability or operating characteristics to the bulk power transmission facilities of the Versant Power transmission system.

Steady State
Steady State Voltage and Thermal Analysis
Steady State N-0 and N-1 contingency analysis was performed at the light, minimum, and winter peak load levels. No violations of thermal or voltage reliability criteria were observed in this analysis. Therefore, the steady state voltage and thermal analyses showed no adverse impact with the addition of the Project.

Stability
Design Contingencies
Stability studies were conducted to assess the Project's impact on stability performance of design contingencies in the vicinity of the Project and to identify violations stability performance criteria. Normal contingencies (NCs) were tested for this assessment. All faults simulated demonstrated that the Project does not introduce adverse impact.

Short Circuit
Fault Duty
The results of the circuit breaker duty study did not identify any circuit breakers with interrupting or momentary ratings in excess of 90% of their ratings.

Conclusion
The Project does not result in significant adverse impact on the reliability, stability or operating characteristics of the Transmission Owner's transmission facilities or the transmission facilities of another Transmission Owner.

Versant Power, in coordination with the NMISA, commissioned a second System Impact Study ("Study") under the Versant Power Open Access Transmission Tariff for Maine Public District Attachment S – Standard Small Generator Interconnection Procedures. The Study tested the steady state, dynamic, and short circuit system performance of a 32.67 MW DER generation cluster. This cluster represented 24 DER facilities that interconnect into Versant's distribution and sub-transmission systems in the MPD service territory. The objective of the study was to demonstrate that these projects will not have a significant adverse effect upon the reliability or operating characteristics to the bulk power transmission facilities of the Versant Power or the New Brunswick transmission system.

Steady State

Steady State Voltage and Thermal Analysis

Steady State N-0 and N-1 contingency analysis was performed at the light and summer peak load levels. No violations of thermal or voltage reliability criteria were observed in this analysis. Therefore, the steady state voltage and thermal analyses showed no adverse impact with the addition of the Project. Although there was no significant adverse impact observed in this study, the total amount of DER has resulted in the main portion of the MPD system to approach a thermal export constraint.

Stability

Design Contingencies

Stability studies were conducted to assess the Project's impact on stability performance of design contingencies in the vicinity of the Project and to identify violations stability performance criteria. Normal contingencies (NCs) were tested for this assessment. All faults simulated demonstrated that the Project does not introduce adverse impact.

Short Circuit

Fault Duty

The results of the short circuit studies that were conducted to assess the impact of the Project on fault current levels and breaker duties in the area demonstrated that there were no circuit breakers with interrupting or momentary duties in excess of 90% of their ratings.

Conclusion

The Project does not result in significant adverse impact on the reliability, stability or operating characteristics of the Transmission Owner's transmission facilities or the transmission facilities of another Transmission Owner.

RESOURCE ADEQUACY

The purpose of the Base Case is to provide information to Market Participants and potential Market Participants of any forecasted long-term deficiency. The calculation by which the NMISA ensures resource adequacy is based upon the Northeast Power Coordinating Council's ("NPCC's") Document C-13, "18-month Load and Capacity Assessment." The C-13 process determines Gross Margin and Net Margins weekly for the 18-month period. The analysis is conducted twice a year, in the spring and fall, for the coming capability periods. Essentially, the analysis compares the load forecast to net resources plus operating reserve. Net resources are the installed capacity adjusted for firm sales, demand response, forced and unplanned outages, and unit deratings. Weekly, the information from the C-13 for the coming week is updated with current information and provided to the NBT&SO, which is the RC for the Balancing Authority Area, in preparation for the NPCC-wide conference call. The C-13 is published in the Documents section of the NMISA web site. The load forecast in this document may differ from the C-13 due to timing differences and the different planning horizons.

The NMISA is part of NPCC's New Brunswick Balancing Authority Area, with NBT&SO acting as the Balancing Authority as well as the RC. NMISA's Operating Reserve requirement is its proportionate share of the Maritimes Area Operating Reserve requirement. The NBT&SO

calculates the Operating Reserve requirement for the region by maintaining adequate Operating Reserve capacity to cover 100% of the single largest contingency plus 50% of the second largest contingency. The NMISA's responsibility is based upon its monthly coincident peak share of the total Maritimes Area load. The average annual Operating Reserve responsibility is approximately 25 MW.

For the Base Case, a 20% planning reserve criterion was used. The difference between planning reserve and Operating Reserve is that the planning reserve process projects reserve requirements over a long-term horizon while the Operating Reserve process plans for actual requirements in the near term to operate the system. The NBT&SO also determines the planning reserve. The amount is based upon NPCC generation reliability criterion that a loss of load expectation shall be, on average, no more than 0.1 days per year. NMISA also participates in the NBT&SO *Maritimes Area Comprehensive Review of Resource Adequacy*. As with prior studies, a 20% planning reserve margin was used. Table 3 reflects the Maritimes Area Load and Resource Review from 2026 to 2036.

NERC Regional Entities

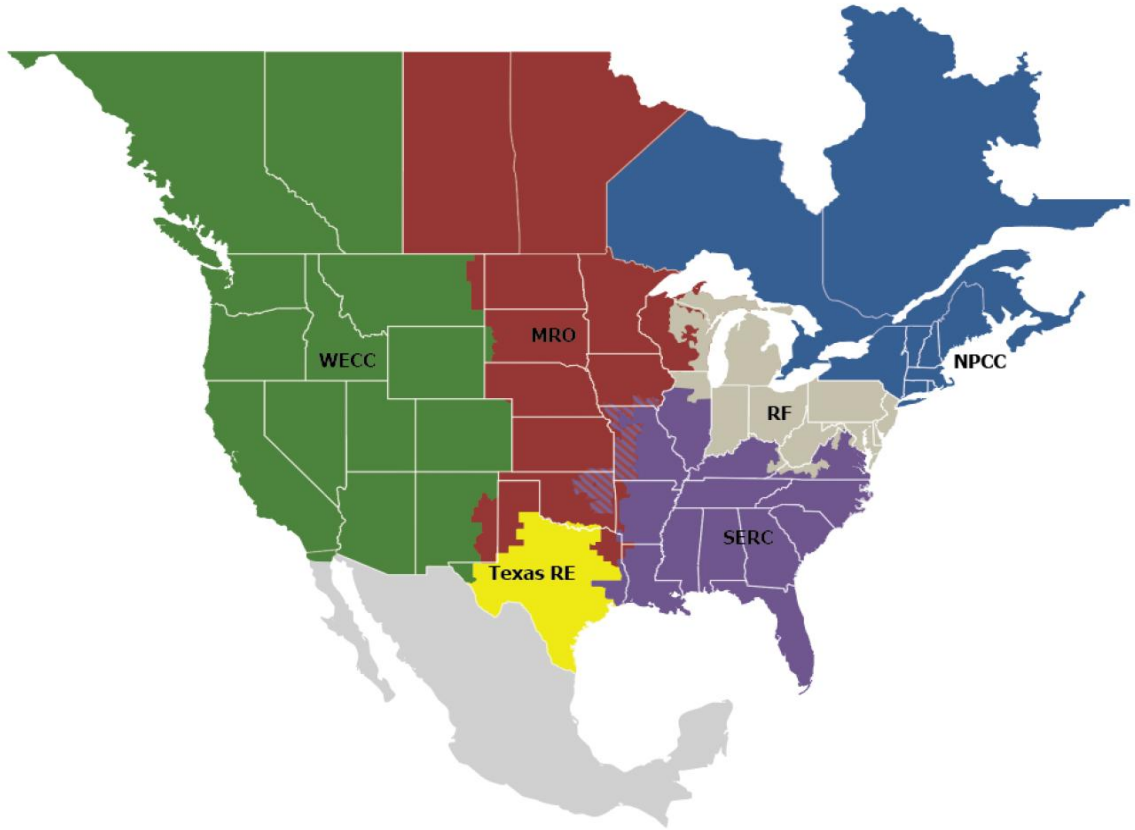


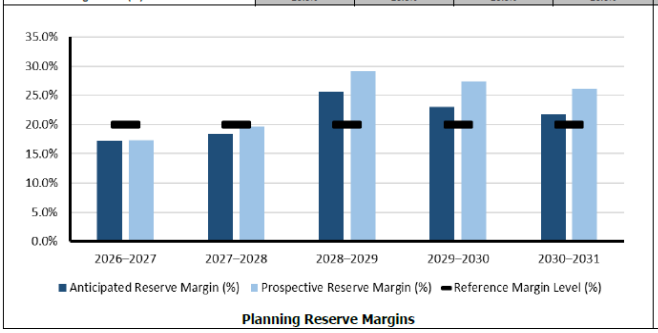
Table 3
NPCC-Maritimes Load and Resources Review

NPCC-Maritimes

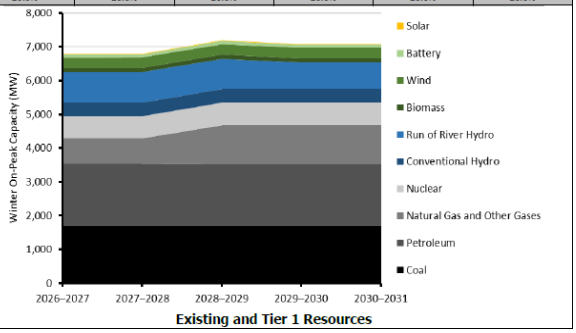
NPCC-Maritimes is an assessment area that covers the Canadian Maritime provinces—New Brunswick, Nova Scotia, and Prince Edward Island—and the northernmost portion of the U.S. State of Maine. The area covers approximately 150,000 square kilometers (58,000 square miles) and has a total population of nearly 1.9 million people. The New Brunswick Power Corporation (NB Power) is the BA for New Brunswick, Prince Edward Island, and the northern portion of Maine. Nova Scotia Power Inc. (NSPI) is the BA for Nova Scotia. NB Power's system is electrically interconnected with NPCC-Québec and NPCC-New England, and the electric systems in the provinces of Nova Scotia and Prince Edward Island have ties with New Brunswick but no direct ties with other assessment areas. Peak electricity demand in NPCC-Maritimes occurs during the winter season.

Demand, Resources, and Reserve Margins

Quantity	2026–2027	2027–2028	2028–2029	2029–2030	2030–2031	2031–2032	2032–2033	2033–2034	2034–2035	2035–2036
Total Internal Demand	6,107	6,157	6,194	6,231	6,292	6,346	6,380	6,493	6,579	6,669
Demand Response	264	283	290	291	290	291	290	291	290	290
Net Internal Demand	5,843	5,875	5,904	5,940	6,001	6,055	6,089	6,202	6,289	6,380
Additions: Tier 1	173	179	579	579	579	579	579	579	579	579
Additions: Tier 2	6	367	656	1,492	1,492	1,492	1,492	1,492	1,492	1,492
Additions: Tier 3	0	0	23	101	215	227	239	251	260	260
Net Firm Capacity Transfers	-32	75	145	145	145	145	145	145	145	145
Existing-Certain and Net Firm Transfers	6,673	6,780	6,838	6,727	6,727	6,727	6,621	6,621	6,596	6,707
Anticipated Reserve Margin (%)	17.2%	18.5%	25.6%	23.0%	21.7%	20.7%	18.2%	16.1%	14.1%	14.2%
Prospective Reserve Margin (%)	17.3%	19.6%	29.2%	27.4%	26.1%	25.0%	22.6%	20.3%	18.3%	18.3%
Reference Margin Level (%)	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%



Planning Reserve Margins



Existing and Tier 1 Resources

The NMISA Load and Resources Review attempts to determine if adequate resources will be available over the long run to meet the projected Total Internal Demand plus the 20% planning reserve. The Existing-Certain and Net Firm Transfers are the sum of the eligible capacity plus Net Firm Capacity Transfers. Table 4 reflects the NMISA's Load and Resources Review from 2026 to 2032.

Table 4
NMISA Load and Resources Review

Demand, Resources, and Reserve Margins (MW)							
Quantity	2026	2027	2028	2029	2030	2031	2032
Total Internal Demand	154.9	155.7	156.4	157.2	158.0	158.8	159.6
Demand Response	0	0	0	0	0	0	0
Net Internal Demand	154.9	155.7	156.4	157.2	158.0	158.8	159.6
Additions: Tier 1	0	0	0	0	0	0	0
Additions: Tier 2	0	0	0	0	0	0	0
Additions: Tier 3	0	0	0	0	0	0	0
Net firm Capacity Transfers*	148	148	148	148	148	148	148
Existing-Certain and Net Firm Transfers	218	218	218	218	218	218	218
Anticipated Reserve Margin (%)	40.6%	39.9%	39.2%	38.5%	37.8%	37.2%	36.5%
Reference Reserve Margin (%)	20.0%	20%	20%	20%	20%	20%	20%

**Includes 24MW for HWC interconnection to NBP*

Historically, the peak has occurred during the winter capability period (November through March) between hours 1700 and 1800. Firm Transfer Capacity includes the MPD, HWC, and EMEC interfaces.

DEMAND SIDE MANAGEMENT

There are no major DSM projects on the NMTS. Most DSM projects are at the local level through the Efficiency Maine program that each utility supports. For more information, the website can be found at the following link: http://www.efficiencymaine.com.

TRANSMISSION PLANNING

Transmission System

The NMTS consists of two independent transmission systems, MPD in Aroostook County and EMEC in portions of Washington County and Penobscot County. The two systems are interconnected only through the NB Power transmission system.

The MPD system is interconnected with New Brunswick via three transmission lines, a 100 MVA import rated interconnection from Flo's Inn to Beechwood, a 100 MVA import rated interconnection at Tinker Station, and a 56 MVA import rated interconnection from Iroquois to Madawaska. The rated Total Transfer Capability ("TTC") of the MPD system is 134 MW for both imports from and exports to New Brunswick. The TTC calculation for the MPD-New Brunswick interface assumes a single contingency loss of the Flo's Inn to Beechwood transmission line. See Exhibit 2 for more details regarding MPD's transmission system.

The EMEC transmission system consists of an approximately 40 mile radial 69 kV transmission line that originates at the Oak Bay, NB substation and terminates at Topsfield, ME substation. There are five load substations that are connected by this line, including Woodland Pulp, which is also a generator. The majority of the line is 266.8 ACSR Partridge conductor, and there is a five-mile section of 1/0 AAAC between Woodland and Princeton. The EMEC system has a TTC of 32 MW for both imports from and exports to New Brunswick in the winter.

Transmission Upgrades

A series of capitalized maintenance projects are planned by MPD. A summary of these projects can be found in MPD's annual MPUC Chapter 330 filing. The most recent version can be found at: https://www.versantpower.com/oasis/ . The effect of such capitalized maintenance projects is expected to be reduction in transmission Operations and Maintenance ("O&M") expenses, reduction in the probability of outages along these segments, and extension of the useful lives of these facilities. These projects are not expected to increase the TTC of the system.

In 2017 ATG upgraded the Tinker Transformer to 100 MVA and rebuilt lines 6901 and 6904. Versant Power rebuilt Line 6901 on the US side. The TTC of the MPD and EMEC interfaces are reflected in Table 5[4]:

Table 5
Summary of TTC and TRM values for the MPD and EMEC Interfaces

	TTC (MW)	TRM (MW)
NBP to MPD	**148**	**38**
MPD to NBP	**165**	**31**
NBP to EMEC	**32**	**5**
EMEC to NBP	**32**	**0**

Potential Transmission Deficiencies

As with generation resources, the purpose of the Base Case is to provide information to Market Participants, including the TOs, and potential Market Participants of any forecasted transmission deficiencies to allow such Market Participants to bring forward proposals to address potential deficiencies. Pursuant to NMMR 9.3.2, NMISA is required to analyze whether any potential investments in the transmission system are necessary to maintain reliability in accordance with NMISA Reliability Standards (see NMMR 8), which include NPCC Reliability Standards, improve the performance of the Northern Maine Market, or reduce the cost of congestion constraints. Pursuant to NMMR 9.3.5, where the Base Case identifies that action is or will be required to alleviate an existing or emerging transmission constraint, the NMISA is directed to take the actions described in NMMR 9.4.1 when, in the NMISA's independent judgment, no adequate proposal exists to address the problem. Pursuant to NMMR 9.3.7, a transmission constraint is considered "emerging" if the NMISA identifies it to be likely to occur within one to five years, and it is considered "potential" if the NMISA identifies it to be likely to occur within six to seven years. NMISA does not identify any emerging or potential constraints for the planning period.

The NMISA is not aware of any planned deactivation, disconnection or retirement of any existing transmission facilities. There has been a dramatic decrease in the number of requests by distributed generators to interconnect to the MPD distribution system. The NMISA and Versant Power will determine if studies are required to determine reliability impacts of such interconnections on the distribution system as well as the transmission system. The transmission assessment may be done as a cluster study. Cluster studies involves conducting a transmission planning study, to identify the transmission infrastructure and associated system upgrades necessary to enable the interconnection of proposed resources in the interconnection queue.

[4] From Total Transfer Capability Report MPS Interface Version 024 and Eastern Maine Electric Cooperative Interface Version 016 (Confidential Report) and NBP OASIS

Conclusion

Below is an excerpt from the NERC Long Term Reliability Assessment Report dated December 2025, NPCC-Maritimes Assessment section:

> *Reliability Issues*
> *The Maritimes area has a diversified mix of capacity resources fueled by oil, coal, hydro, nuclear, natural gas, wind (de-rated), dual fuel oil/gas, tie benefits, and biomass with no one type feeding more than about 32% of the total capacity in the area. The Maritimes area does not anticipate fuel disruptions that pose significant challenges to resource during the assessment period.*

The NMISA finds that there are no emerging or potential transmission constraints.

SUMMARY OF RESULTS

Load Forecast

The load forecast for Northern Maine projects an average growth rate of 0.5% per year over the seven-year planning period covered in the Base Case for both energy and demand. The anticipated peak hourly demand for Northern Maine is 159.6 MW in 2032. 2032 is the final year covered in the Base Case.

Generation Resources

NMISA projects that based upon committed generation resources, the MPD region will rely on the MPD/NB interface through the planning period to account for any deficiencies.

Transmission Planning

Routine annual capital projects that are currently projected for the planning period consist of a series of capitalized maintenance projects that should generally increase system reliability and decrease transmission O&M expenses.

EXHIBIT 1

Net Energy Billing - Distributed Generation
Active Operational > 500 kW

District	Initial Go-Live Date	AC Size (kW)	Fuel Type	Credit Type	Location
MPD	05/06/19	650	Solar	kWh	Caribou
MPD	11/08/21	4,990	Solar	Tariff	Caribou
MPD	03/30/23	4,100	Solar	Tariff	Limestone
MPD	06/01/23	4,000	Solar	Tariff	Fort Kent
MPD	07/13/23	4,999	Solar	Tariff	Fort Kent
MPD	08/11/23	4,100	Solar	Tariff	Caribou
MPD	08/25/23	4,988	Solar	Tariff	Fort Fairfield
MPD	02/01/24	2,500	Solar	kWh	Limestone
MPD	02/12/24	3,250	Solar	Tariff	Easton
MPD	02/28/24	2,500	Solar	kWh	Frenchville
MPD	04/03/24	4,980	Solar	Tariff	Monticello
MPD	04/22/24	1,400	Hydro	Tariff	Masardis
MPD	08/02/24	2,500	Solar	kWh	Westfield
MPD	08/14/24	3,000	Solar	kWh	Patten
MPD	11/08/24	2,625	Solar	Tariff	Mars Hill
MPD	11/08/24	2,875	Solar	Tariff	Limestone
MPD	12/04/24	4,999	Solar	kWh	Masardis
MPD	12/06/24	4,000	Solar	Tariff	Madawaska
MPD	12/19/24	2,500	Solar	kWh	Ashland
MPD	12/20/24	4,950	Solar	Tariff	Caribou
MPD	12/23/24	3,070	Solar	Tariff	Dyer Brook
MPD	12/27/24	3,000	Solar	kWh	Sherman
MPD	12/30/24	4,000	Solar	kWh	Ashland
MPD	12/30/24	2,997	Solar	Tariff	Presque Isle
MPD	12/30/24	3,750	Solar	Tariff	Limestone
MPD	12/30/24	2,997	Solar	Tariff	Presque Isle
MPD	12/31/24	3,000	Solar	kWh	Ashland
MPD	12/31/24	1,720	Solar	kWh	Fort Fairfield
MPD	12/31/24	3,120	Solar	kWh	Grand Isle
MPD	12/31/24	2,500	Solar	kWh	Mapleton
MPD	12/31/24	2,800	Solar	kWh	Presque Isle
MPD	12/31/24	2,600	Solar	Tariff	Presque Isle
MPD	10/31/25	990	Solar	Tariff	Mapleton
MPD	11/01/25	1,990	Solar	Tariff	Presque Isle
Tariff		**69,651**			
kWh		**38,789**			
Total		**108,440**			

EXHIBIT 2

Summary of MPD Transmission Lines

MPD has 376.91 circuit miles and pole miles of transmission lines. It serves an area of approximately 3,600 square miles and 36,000 retail customers through transmission and distribution level systems. A breakdown of transmission mileage is as follows:

Voltage	Circuit Miles	Pole Miles
34,500	7.97	7.97
44,000	46.43	46.43
69,000	310.62	310.62
138,000	11.89	11.89

The main trunk portion of Line 3470 has been classified as transmission by FERC. Most of this line mileage is for subtransmission lines, i.e. it serves the 28 MPD distribution substations. Two lines, 6904 and 3855, are true transmission lines that do not serve any distribution stations.