

December 3, 2008

Thomas S. Burack, Chairman
Site Evaluation Committee
New Hampshire Department of Environmental Services
29 Hazen Road
Concord, New Hampshire 03301

RE: Application of Granite Reliable Power, LLC
Docket No. 2008-04

Dear Chairman Burack:

Enclosed for filing with the New Hampshire Site Evaluation Committee with reference to the above-captioned matter, please find a "Motion to Request Enlargement of Time to Submit Pre-filed Testimony". This motion is being sent via electronic mail and also (1) one original and (9) nine copies by first class mail.

Thank you for your attention to this matter.

Sincerely yours,



Kathlyn J. Keene
Intervenor/GRP application
Post Office Box 163
Jefferson, New Hampshire 03583
(603) 586-7052
mollydog@ncia.net

cc: Service List (via e-mail)

**STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE
Docket No. 2008-04**

**RE: Application of Granite Reliable
Power, LLC for Certificate of Site
and Facility to Construct up to 99 MW
of Wind Electric Generation in Coos County,
New Hampshire and Operate the Same**

**MOTION OF KATHLYN J KEENE, INTERVENOR TO REQUEST
ENLARGEMENT OF TIME TO SUBMIT PRE-FILED TESTIMONY**

**Kathlyn J. Keene, (“Intervenor”) hereby respectfully moves the Committee to consider enlarging the time for submitting pre-filed testimony to January 10, 2009.
In support hereof, Intervenor respectfully submits as follows:**

1.) On September 26, 2008 the Presiding Officer in the above-referenced matter issued a Report of the Pre-hearing Conference (“The Report”) included in the Report is the procedural schedule agreed to by all parties. This Report included a scheduling of dates to follow during the procedures of this application. Knowing that this schedule was developed with the best intentions, it is clear that the normal process of such a schedule must allow for scheduling changes due to overrun of time during the proceedings.

2.) This matter encompasses a proposed facility exclusively to be built in one of the most prestigious wilderness areas in the northern reaches of Coos County. The facility is immense in its magnitude of size and effects thousand of acres of wildlife habitat, wetland and ecological considerations.

3.) On October 13, 2008, Counsel for the Public, Peter C. L. Roth (“Public Counsel”) submitted a motion to pursuant to RSA 162-H:10, II for entry of an order directing that further hearings on this matter be conducted exclusively in Coos County. To date, December 3, 2008, this order request has gone unanswered.

4.) On November 7, 2008, Counsel for the Public, Peter C. L. Roth (“Public Counsel”) submitted a motion to retain Dr. George Mariani and Sanford Environmental Services, Inc. as a consulting firm and for an order directing Granite Reliable Power, LLC and Noble Environmental Power, LLC to bear the costs. To date, December 3, 2008, this motion and order has gone unanswered.

5.) On November 7, 2008 Public Counsel’s above motion and order included the use of this consultant to visit the site; participate in technical sessions and be available at the hearing on the merits. The consultant’s expertise will provide invaluable information to the Intervenor’s preparing their documents for these proceedings.

6.) On November 21, 2008 Tech Session #2 was held in Coos County Superior Court, Lancaster, New Hampshire. Public Counsel was delegated to present his questions first. Counsel has and does have informative questions concerning this immense project, however, a consultant with the expertise in environmental issues is imperative. This would provide the Intervenors, Public Counsel and all Parties involved for a fair opportunity to develop information important to this case. To hold technical sessions without such expertise is not in the best interest of these proceedings or the public in Coos County.

7.) On December 2, 2008, Michael Iacopino, Attorney for the SEC, set a date of December 19, 2008 to continue Tech Session #2 as Tech Session 2A. At this time, Public Counsel will continue with his questions. This is after the scheduled date of December 10, 2008 for submitting the Pre-filed testimony.

8.) Due to the technical session running over on November 21, 2008 and reconvening on December 19, 2008, the Intervenors would need more time to gather their information.

WHEREFORE, I respectfully request that the Presiding Officer grant me an order extending the date to January 10, 2009 to file Pre-filed testimony given the above mentioned reasons and/or relief as he deems appropriate in this situation.

Polled Intervenors, Public Counsel, Attorney for the Applicant.

Supports Motion: Industrial Wind Action Group (Lisa Linowes); Wayne Urso, Robert Keene, Jon Odell; Appalachian Mountain Club (David Publicover); Peter C. L. Roth, Public Counsel.

Not Supportive of Motion: NH Wind Energy Association (Farrell S. Seiler)

No Response: Sonja Sheldon; Clean Power Development (Jeffrey Meyers, Esq.)

Offering different date(January 5, 2009): Attorney for Applicant (Douglas Patch, Esq.)



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Dated: December 3, 2008