

June 15, 2010

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Jeremy D. Eggleton
Rachel A. Goldwasser
Joshua M. Pantesco
John L. Arnold
Michael T. Cretella

Via Electronic and U.S. Mail
NH Site Evaluation Committee
c/o Jane Murray, Secretary
29 Hazen Drive, P.O. Box 95
Concord, NH 03302-0095

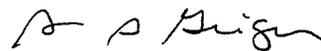
***Re: Application of Groton Wind, LLC –
SEC Docket No. 2010-10***

Dear Ms. Murray:

Enclosed for filing with the Site Evaluation Committee in the above-captioned matter, please find an original and 3 copies of the Applicant's Response to Town of Plymouth's Motion for Leave to File Petition to Intervene.

Please contact me if you have any questions about the enclosed filing.
Thank you.

Very truly yours,



Susan S. Geiger

Maureen D. Smith
(Of Counsel)

cc: Via Electronic Mail to
Attorney John L. McGowan and
Service List (exclusive of Committee members)
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STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE

Docket No. 2010-01

**RE: APPLICATION OF GROTON WIND, LLC
FOR A CERTIFICATE OF SITE AND FACILITY
FOR A RENEWABLE ENERGY FACILITY IN GROTON, NH**

**APPLICANT'S RESPONSE TO TOWN OF PLYMOUTH'S
MOTION FOR LEAVE TO FILE PETITION TO INTERVENE**

NOW COMES Groton Wind, LLC ("the Applicant") by and through its undersigned attorneys and respectfully responds to Town of Plymouth's Motion for Leave to File Petition to Intervene in the above-captioned matter by stating as follows:

1. The Order and Notice of Pre-Hearing Conference, Site Visit and Public Information Hearing issued on May 21, 2010 by Subcommittee Chairman Getz in the above-captioned matter states that any person interested in participating as a party in this proceeding is required to file a Petition to Intervene pursuant to RSA 541-A:32 and N.H. Admin. Rule Site 202.11 on or before June 4, 2010. The Order and Notice also scheduled a prehearing conference and technical session to be held June 7, 2010.

2. On June 10, 2010, the Town of Plymouth, through its attorneys, filed a Motion for Leave to File Petition to Intervene. This Motion seeks to waive N.H. Admin. Rule Site 202.11(b)(1) which requires that a petition to intervene in proceedings before the New Hampshire Site Evaluation Committee be filed at least three (3) days before hearing. The Motion also contains a section entitled "Petition to Intervene."

3. Via electronic mail to the Town of Plymouth's Attorney on June 10, 2011, the undersigned indicated that the Applicant did not object to the Town's Motion, subject to the

condition that the Town of Plymouth's participation in this docket does not delay the proceedings. Notwithstanding the provisions of Site 202.14(e), the Town did not indicate the Applicant's position in the body of the Town's Motion, thereby necessitating the filing of this Response.

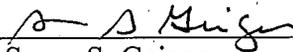
4. Despite the fact that the Town's request for intervention in this docket is late-filed, the Applicant does not oppose it, so long as the Town's participation in this docket does not delay the proceedings. More specifically, the Applicant respectfully requests that if the Town of Plymouth is granted intervention in this docket, the Town's participation will not cause a delay in the procedural schedule which was developed among the parties who attended the noticed prehearing conference and technical session on June 7, 2010.

WHEREFORE, the Applicant respectfully requests that if the Town's Motion is granted that the Town's participation in the docket be subject to the condition that such participation does not delay the proceedings as indicated above.

Respectfully submitted,

Groton Wind, LLC

By Its Attorneys



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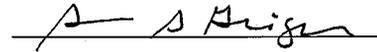
Dated: June 15, 2010

Certificate of Service

I hereby certify that, on the date written below, I caused the foregoing Response to be sent by electronic mail or U.S. mail, postage prepaid, to the persons on the service list.

6/15/2010

Date



Susan S. Geiger

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