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January 25, 2011

**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: Docket 2010-01 - Application of Groton Wind, LLC  
for a Certificate of Site and Facility for a Renewable Energy Facility***

Dear Ms. Murray:

Enclosed for filing with the Site Evaluation Committee in the above-captioned docket, please find an original and four copies of Applicant's Response to Partially-Assented-To Petition of the Town of Holderness to Intervene.

Please contact me if there are any questions about this filing. Thank you for your assistance and cooperation.

Very truly yours,



Susan S. Geiger

cc: Service List (via Electronic Mail only)  
Enclosure  
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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 PARTIALLY-ASSENTED-TO  
PETITION OF THE TOWN OF HOLDERNESS TO INTERVENE**

NOW COMES Groton Wind, LLC (“the Applicant”) by and through its undersigned attorneys and respectfully responds to the Partially-Assented-To Petition of the Town of Holderness To Intervene (“the Petition”) in the above-captioned matter by stating as follows:

1. In its Petition, the Town of Holderness (“the Town”) states that its rights, duties and substantial interests and those of its residents “may be affected by the proceedings in the above-captioned matter due to the proposed location and nature of the voltage step-up facilities” proposed by the Applicant. *See* Petition, paragraph 2.

2. Notwithstanding the above-stated limited nature of the Town’s interests in the above-captioned matter, the Town is seeking full intervention, “without condition or reservation.” *See* Petition, paragraph A.

3. The Town’s intervention petition may be granted if it demonstrates that the Town’s rights, duties, privileges, immunities or other substantial interests may be affected by the proceeding, and if the Presiding Officer determines that the intervention is in the interests of justice and would not impair the orderly and prompt conduct of the proceedings. RSA 541-A:32, I, (b) and (c).

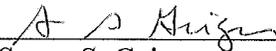
4. If the Town qualifies for intervention under the standard articulated above, then the Presiding Officer may impose conditions on such intervention which may include limitation of the Town's participation to designated issues in which the Town has a particular interest demonstrated by the Petition. RSA 541-A:32, III (a). This precise step was taken by the Presiding Officer in limiting the Town of Goshen's intervention in the Lempster Wind, LLC docket. *See Re: Community Energy Inc. and Lempster Wind, LLC, SEC Docket No. 2006-0001, Order on Motion of the Town of Goshen to Intervene and Motion of Public Service Company of (February 8, 2007).*

5. The Applicant does not contest that the Town has met its burden of demonstrating that its rights, duties, privileges, immunities or other substantial interests may be affected by this proceeding and therefore meets the first criterion for intervention in this proceeding. However, to grant the intervention request, the Presiding Officer must also determine that such intervention will not impair the orderly and prompt conduct of the proceedings. The Applicant respectfully submits that the orderly and prompt conduct of the proceedings will not be impaired if the Town of Holderness's participation in this docket is limited to consideration of the issues relating solely to the facilities that are proposed to be located in the Town of Holderness. Conversely, if the Town is granted full intervention, without limitation, the potential exists for these proceedings to be disrupted and delayed by the Town's exploration of issues beyond those relating solely to the facilities that are proposed to be located in the Town of Holderness.

WHEREFORE, the Applicant respectfully requests that if the Town of Holderness is allowed to intervene in this docket, such intervention should be limited in the manner specified above.

Respectfully submitted,

Groton Wind, LLC  
By Its Attorneys  
Orr & Reno, P.A.

  
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Susan S. Geiger

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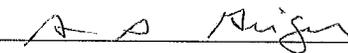
Dated: January 25, 2011

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.

1/25/11

Date

  
\_\_\_\_\_  
Susan S. Geiger

Susan S. Geiger

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