

Orr&Reno

October 10, 2013

William L. Chapman
George W. Roussos
Howard M. Moffett
James E. Morris
John A. Malmberg
Douglas L. Patch
Steven L. Winer
Peter F. Burger
Lisa Snow Wade
Susan S. Geiger
Jennifer A. Eber
Jeffrey C. Spear
Connie Boyles Lane
Judith A. Fairclough
Maureen D. Smith
Todd C. Fahey
James F. Laboe
Robert S. Carey
John M. Zaremba
Heidi S. Cole
Jeremy D. Eggleton
Rachel A. Goldwasser
Rebecca E. Perkins

Via Hand Delivery and Electronic Mail

NH Site Evaluation Committee
c/o Jane Murray, Secretary
29 Hazen Drive, P.O. Box 95
Concord, NH 03302-0095

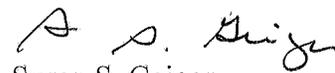
Re: Docket 2010-01, Groton Wind, LLC

Dear Ms. Murray:

Enclosed for filing with the Site Evaluation Committee in the above-captioned docket, please find an original and 9 copies of Groton Wind, LLC's Objection to Mark Watson's Intervention Request.

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

Very truly yours,


Susan S. Geiger

Lawrence A. Kelly
(Of Counsel)

Neil F. Castaldo
(Of Counsel)

cc: Service List (electronic mail only)
Senior Assistant Attorney General Karen Schlitzer (electronic mail only)
Mr. Mark Watson (U.S. mail only)
Enclosures
1072177_1

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**

**GROTON WIND, LLC'S OBJECTION TO
MARK WATSON'S INTERVENTION REQUEST**

NOW COMES Groton Wind, LLC ("the Applicant") by and through its undersigned attorneys and respectfully objects to Mr. Mark Watson's request to intervene in the above-captioned matter by stating as follows:

1. The Order and Notice of Public Meeting issued on January 18, 2013 by Chairman Burack in the above-captioned matter states that any person wishing to intervene in this matter is required to file a motion to intervene pursuant N.H. Admin. Rule Site 202.11 on or before February 8, 2013.
2. In a letter to Chairman Burack dated March 18, 2013, Mr. Watson expressed concerns about the accessibility of Groton Wind's roads to fire fighting equipment but did not request intervention.
3. On September 30, 2013, Mr. Watson filed a letter with the Site Evaluation Committee ("SEC") requesting intervenor status "due to the recent disclosure by the State's Fire Marshal that Groton Wind does not have a fixed fire suppression system," referring to a letter dated August 12, 2013 from Investigator Ron Anstey of the State Fire Marshal's Office.
4. Groton Wind notes that Mr. Watson's concern about fire safety is indistinguishable from that of the State Fire Marshal's Office, which has appeared in this proceeding.

Representatives of Groton Wind are attempting to work with Inspector Anstey to resolve the issues raised in his August 12, 2013 letter. Thus, there is no need for Mr. Watson to participate separately as intervenor in this proceeding, as his interests are being adequately protected by the State Fire Marshal's Office. Indeed, Mr. Watson's stated purpose for intervening is that so he can have "a voice in the SEC's hearing process." However, as Mr. Watson's March 18, 2013 letter makes clear, he need not be an intervenor in order to express his concerns to the SEC. Indeed, his intervention is likely to hinder the adjudicative process and increase the difficulty of Groton Wind reaching resolution with State Fire Marshal's Office.

5. In addition, although Mr. Watson states that his home is in "close proximity" to the Groton Wind facility in his intervention request, Mr. Watson's March 18, 2013 letter indicates that his "home is located approximately 1 ½ miles from the east turbines." As such, Mr. Watson has not demonstrated rights, duties, privileges, immunities or other substantial interests that may be affected by this proceeding. *See* RSA 541-A:32, I(b).

6. Finally, Mr. Watson's intervention request is late-failed and threatens to impair the orderly and prompt conduct of these proceedings. *See* RSA 541-A:32, I(c). Because Mr. Watson fails to meet the intervention standards set forth above, his intervention request must be denied.

WHEREFORE, Groton Wind, LLC respectfully requests that:

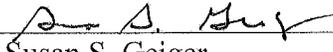
- A. Mr. Watson's intervention request be denied;
- B. In the alternative, if Mr. Watson's intervention request is granted, and in the event that the State Fire Marshal's Office is granted intervenor status, that Mr. Watson be ordered to coordinate his participation in this docket with the State Fire Marshal's Office

in accordance with RSA 541-A:32, III (c) (i.e. combined presentations of evidence and argument, cross-examination and other participation in the proceeding).

Respectfully submitted,

Groton Wind, LLC

By Its Attorneys


Susan S. Geiger
Orr & Reno, P.A.
45 South Main Street
Concord, N.H. 03302-3550
(603) 223-9154
Fax (603) 223-9054
sgeiger@orr-reno.com

Mark Epstein, Senior Counsel
Iberdrola Renewables
2 Radnor Corporate Center, Suite 200
100 Matsonford Rd.
Radnor PA 19087
(484) 654-1885
Mark.Epstein@IberdrolaRen.com

Dated: October 10, 2013

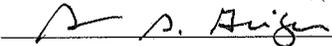
Certificate of Service

I hereby certify that, on the date written below, I caused the foregoing Objection to be sent by electronic mail or U.S. mail, postage prepaid, to the persons named on the service list for this docket as well as to Senior Assistant Attorney General Karen Schlitzer and Mr. Mark Watson.

10/10/13

Date

1072140_1



Susan S. Geiger