

**STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE**

**APPLICATION OF GROTON WIND, LLC
NO. 2010-01**

**RESPONSE OF COUNSEL TO THE PUBLIC TO FILING OF
GROTON WIND LLC'S ENVIRONMENTAL HEALTH AND SAFETY PLAN**

Counsel for the Public, by his attorneys, the Office of the Attorney General, hereby responds to the October 11, 2013 filing of the Groton Wind LLC Environmental Health and Safety Plan (the "Plan"). Counsel for the Public notes that the filing was not accompanied by any request for relief and thus the issues raised last winter remain unresolved.

Furthermore, Counsel for the Public notes that the Plan does not address key issues raised last winter concerning access to the facility property and roads during winter conditions. Instead, the Plan refers to other plans, including an "Emergency Response Plan" without providing any of the parties or the Committee copies for review and consideration. The Plan raises several significant questions including,

- a. What is the plan for maintaining access to the roads for local fire and rescue personnel during winter conditions?
- b. Under what circumstances will Groton Wind personnel call 911?
- c. What are the terms and conditions of the Emergency Response Plan?
- d. Why is Iberdrola only "encouraged to have local emergency services participate" in drills? Why is this not required?

e. Who determines when it is “appropriate” to escort emergency services onto the Groton Wind facilities? What criteria are used to make this determination?

f. If an emergency occurs at a location other than the O&M building, why are emergency services dispatched there? Should not emergency services be allowed to respond anywhere where an emergency has occurred?

g. What is the Fire Prevention Plan?

h. What is the Hot Work Program?

With these questions unanswered, the Plan is not sufficient. In addition, where Groton Wind LLC has not sought any relief with respect to the Plan or the emergency response issues, the violations of the terms of its certificate that were disclosed last winter remain unresolved.

Respectfully submitted,

COUNSEL FOR THE PUBLIC

JOSEPH A. FOSTER

ATTORNEY GENERAL

October 18, 2013

By /s/ Peter C.L. Roth
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CERTIFICATE OF SERVICE

I, Peter C.L. Roth, do hereby certify that I served the foregoing upon the parties by email.

October 18, 2013

/s/ Peter C.L. Roth

Peter C.L. Roth