

**ATTORNEY GENERAL
DEPARTMENT OF JUSTICE**

33 CAPITOL STREET
CONCORD, NEW HAMPSHIRE 03301-6397

JOSEPH A. FOSTER
ATTORNEY GENERAL



ANN M. RICE
DEPUTY ATTORNEY GENERAL

November 18, 2013

Jane Murray
Program Assistant I
NH Dept. of Environmental Service
29 Hazen Drive
Concord, New Hampshire 03301

Re: Application of Groton Wind, LLC
Docket No. 2010-01

Dear Ms. Murray:

Enclosed please find Response of the Department of Safety to the Public Filing of Groton Wind LLC's Environmental, Health and Safety Plan for filing in the above-captioned case.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Mary C. Evans".

Mary C. Evans
Legal Assistant
Transportation & Construction Bureau
(603) 271-3675

mce
Enclosure
cc: Service List (electronic mail only)
971980

STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE

APPLICATION OF GROTON WIND, LLC

NO. 2010-01

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

Now Comes the State of New Hampshire, Department of Safety, by its attorneys, the Office of the Attorney General, and responds to the October 11, 2013 filing of the Groton Wind, LLC "Environmental, Health and Safety Plan" (the "Plan") and in support thereof states as follows:

As a preliminary matter, the heading of the Plan suggests that it is a broad Plan encompassing all environmental, health, and safety issues. However, it has very limited application and in no way addresses all of the existing safety issues. For example, the Plan does not directly address the specific issues that were raised, including significant issues related to the accessibility of the access roads to the property and structures. Demonstrated inaccessibility by emergency responders to the property and structures since the time the permit in this case was granted further highlights the need for a fire suppression system.

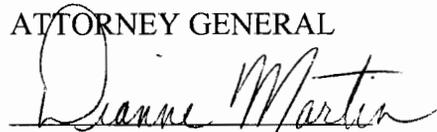
Ron Anstey from the Department of Safety, Office of the State Fire Marshal, has reviewed the Plan and offers the following in lieu of a separate response:

1. The plan appears to be more of an overview rather than a comprehensive response plan for emergency services. Section 3.0 cites an "emergency response plan" however the plan was not attached and could not be reviewed.
2. It would be important for the first responders to know the level at which the employees are certified in first aid, it may affect their response.
3. Section 3.6 directs an employee to meet emergency services. The section is very generic in its description of the related procedures.
4. Section 3.8 lists "supplementary actions for the following emergencies." The emergencies are listed however the actions are not.
5. Section 6.0 lists levels of training but does not elaborate.
6. It is his opinion that this plan is incomplete. It provides the emergency services with very little information.

Respectfully submitted,

STATE OF NEW HAMPSHIRE
DEPARTMENT OF SAFETY
By its attorneys,

JOSEPH A. FOSTER
ATTORNEY GENERAL



Dianne Martin, NH Bar # 15350

Attorney

Transportation & Construction Bureau

33 Capitol Street

Concord, NH 03301

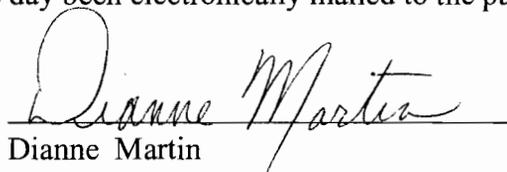
(603)271-3675

Dated: November 18, 2013

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has this day been electronically mailed to the parties on the service list.

November 18, 2013



Dianne Martin