

**ATTORNEY GENERAL
DEPARTMENT OF JUSTICE**

33 CAPITOL STREET
CONCORD, NEW HAMPSHIRE 03301-6397

JOSEPH A. FOSTER
ATTORNEY GENERAL



ANN M. RICE
DEPUTY ATTORNEY GENERAL

December 16, 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 Contested Motion of Groton Wind, LLC to Amend Certificate of Site and Facility 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)
981883

STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE

APPLICATION OF GROTON WIND, LLC

NO. 2010-01

RESPONSE OF THE DEPARTMENT OF SAFETY TO THE CONTESTED MOTION OF
GROTON WIND, LLC TO AMEND CERTIFICATE OF SITE AND FACILITY

Now Comes the State of New Hampshire, Department of Safety, and the Office of the Fire Marshal (hereinafter referred to together as the “Department of Safety”), by their attorneys, the Office of the Attorney General, and responds to the December 4, 2013 filing of the Groton Wind, LLC “Contested Motion of Groton Wind, LLC to Amend Certificate of Site and Facility” (the “Motion”) and in support thereof states as follows:

The Department’s primary concern with the changes to the site and facility that are the subject of the Motion is that it was not provided the plans and information related to the changes in advance. As a result, the Department was denied the opportunity to conduct its plan review and review the changes for safety and fire hazards, and compliance generally with the fire and building codes, in any meaningful way. The changes include not only relocation of the O& M Building, but elimination of access roads, and other changes that implicate the fire and building codes.

The Department does not waive ongoing review of the site as currently situated and related enforcement of the fire and building codes.

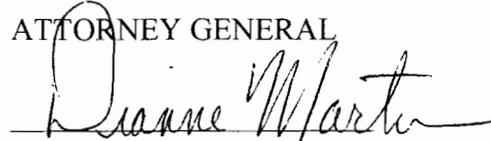
Respectfully submitted,

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

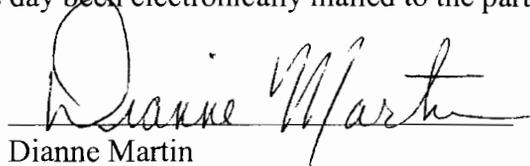
(603) 271-3675

Dated: December 16, 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.

December 16, 2013



Dianne Martin