

April 30, 2012

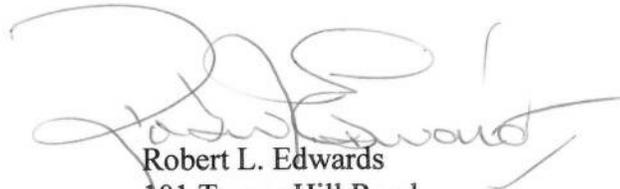
Amy L. Ignatius, Vice Chairman
New Hampshire Site Evaluation Committee
c/o New Hampshire Department of Environmental Services
29 Hazen Drive, PO Box 95
Concord, New Hampshire 03302-0095

RE: Docket No. 2012-01 Application of Antrim Wind, LLC For a Certificate of Site and Facility for a Renewable Energy Facility to be Located in Antrim, Hillsborough County, New Hampshire

Dear Chairman Ignatius,

Attached please find for filing in this matter the Motion to Intervene of Robert L. Edwards and Mary E. Allen.

Sincerely,



Robert L. Edwards
101 Turner Hill Road
Antrim, NH 03440



Mary E. Allen
21 Summer St.
Antrim, NH 03440

April 30, 2012

Amy L. Ignatius, Vice-Chairman
New Hampshire Site Evaluation Committee
c/o New Hampshire Department of Environmental Services
29 Hazen Drive, PO Box 95
Concord, New Hampshire 03302-0095

Reference: Antrim Wind Energy, LLC
SEC Docket No. 2012-01

PETITION FOR INTERVENTION
BY ROBERT L. EDWARDS
AND MARY E. ALLEN

We respectfully petition the New Hampshire Site Evaluation Committee to grant us general intervention status in the proceedings in Docket No. 2012-01, Re: Antrim Wind Energy, LLC, pursuant to RSA 541-A:32 and NH Code of Administrative Rules, Site 202.11, and further state as follows:

We have each continuously maintained a primary residence and have been a registered voter in the Town of Antrim for more than thirty years. We have each served our town in numerous official positions.¹ We have each served our town, as well, in numerous charitable activities as volunteers.

We each successfully sought intervention in the earlier proceeding brought by Antrim Wind Energy, LLC, SEC Docket No. 2011-02, both participating during the hearings as members of what became referred to as the Allen Group of interveners.

During an intense period, running from May, 2011, through and following the SEC decision in 2011-02 (Jurisdictional order and dissent, August 10 and 23, 2011) in the summer and early fall of 2011, we each served on the Ad Hoc Committee formed to

¹ Mr. Edwards was a member of the Planning Board for many years (and on two separate occasions its Chairman); was Trustee of Trust Funds for nearly thirty years; and was a member of the Tax Increment Finance Committee for ten years. Ms. Allen was a member of the Zoning Board of Adjustment for more than a decade (and its Chairman for several years); was an alternate to the Planning Board for several years; and was Supervisor of the Checklist for more than a decade. She served on two Master Plan Committees, and on the Capital Improvement Committee.

assist our Planning Board to conduct research and make recommendations concerning a large-scale wind energy facility zoning ordinance for our town. Since our service on the Ad Hoc Committee, we have each attempted to stay informed, building on a base of knowledge gained as to issues raised for our town as applied to our own conditions and circumstances in appropriate siting and operation of large-scale wind energy facilities.²

Since early fall 2011, our Planning Board has twice brought a proposed zoning amendment for a large-scale wind ordinance to ballot vote, with the result that existing zoning has been left intact and unchanged, the applicant has filed its application before the SEC, and the applicant has discussed with the select board proposals for an operating agreement and in lieu of tax agreement should a certificate be granted in these Docket 2012-01 proceedings. We have each attended such public meetings as there may have been in which proposals for an operating agreement and in lieu of tax agreement were discussed.

Mr. Edwards is an elected member of the Budget Advisory Committee of our town.³ His professional experience, over forty-two years, has centered in the banking industry in the Monadnock region. As a banker, he regularly reviews financing applications and agreements for proposed development projects of a wide variety, and has also served on the board of directors of charitable organizations considering development projects.⁴

Ms. Allen is an elected representative from Antrim to the 13-member school board for the Contoocook Valley Regional School District, having served for the past six years. She has served on its Budget and Property Committee and is currently directly involved with a \$4 million building renovation project. Antrim is among the nine towns comprising this cooperative school district, which has an annual budget of \$44 million. Within the school district, the school tax is apportioned among towns through a formula based, in significant part, on each town's total equalized assessed valuation.

While it may be hoped that important economic benefits to or orderly development of the region might result from any issuance of a certificate for a large-scale wind energy facility in these Docket 2012-01 proceedings, this will not happen without careful

² Mr. Edwards' long-time residence is located in the Rural Residential zoning district, and potentially falls in or near an impact zone were a large-scale wind energy facility to be located on Riley Mountain, another of the many Antrim Hills, so-called.

³ In the most recent March 2012 town election, Mr. Edwards also fell short by a mere fifteen votes being elected Selectman (the result of a last minute write-in campaign mounted in his favor, although not sponsored by him).

⁴ He is currently vice president/commercial lending of a nationally chartered commercial bank. He is also currently chairman of the board of trustees of the regional community hospital, with acute care facilities and other services.

judgments being made concerning the financial, technical, and management capacity of the applicant. Initial proposal data and other supporting materials, including suggested agreements provided by an applicant, necessitate diligent testing, through discovery, evidentiary presentation, and cross-examination.

For instance: Can the applicant demonstrate adequate financial capacity to meet full local ad valorem real estate tax obligations, when the town's equalized assessed valuation is increased by the total cost of project construction?⁵

Can the applicant demonstrate assurance of continuing compliance with appropriate conditions, on the basis of its proposal to finance the project entirely on a non-recourse basis, while contracting out and securitizing almost all aspects of facility construction and operation?

Can the applicant demonstrate that it proposes for incorporation into any certificate to be issued such decommissioning terms and conditions as will adequately protect the town?⁶

Our rights, duties, privileges, immunities, or substantial interests as residents, registered voters, town officials, town meeting members, property owners and citizens may be affected by these Docket 2012-01 proceedings. Allowing intervention will not impair, but rather will affirmatively serve, the interests of justice. Nor will it interfere with the orderly and prompt conduct of the proceedings, especially as we each have shown our past full cooperation to that end.

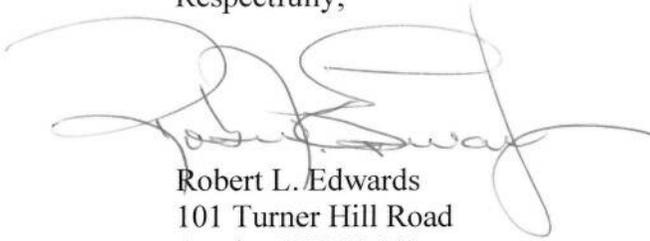
WHEREFORE Robert L. Edwards and Mary E. Allen respectfully request that the Committee grant this Petition for Intervention pursuant to RSA 541-A:32.

We hereby certify that we have today served a copy of this Petition for Intervention electronically and by US Mail, postage prepaid, upon the New Hampshire Site Evaluation Committee as provided in NH Administrative Code, Site 202.07 and that the New Hampshire Site Evaluation Committee will serve necessary parties electronically.

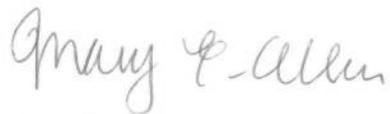
⁵ Without ongoing subsidy from town taxpayers in the form of a PILOT insulating the applicant, but not the town, from the effect of such an increase. Also, what financial capacity exists to continue to satisfy local ad valorem real estate tax obligations if the applicant, or its successors in interest, should prematurely cease facility operation?

⁶ That the Board of Selectmen, several days before the March 2012 town election, prior even to any fact-finding record begun in these proceedings, signed an operating agreement proposing language pertaining to decommissioning will not settle the question.

Respectfully,

A handwritten signature in cursive script, appearing to read "Robert L. Edwards". The signature is fluid and somewhat stylized, with a large loop at the end.

Robert L. Edwards
101 Turner Hill Road
Antrim, NH 03440
(603) 588-6861
sedwards@conknet.com

A handwritten signature in cursive script, appearing to read "Mary E. Allen". The signature is elegant and clearly legible.

Mary E. Allen
21 Summer Street
Antrim, NH 03440
(603) 588-2742
mallen65@hotmail.com