

STATE OF NEW HAMPSHIRE SITE EVALUATION COMMITTEE

RE: Application of Antrim Wind, LLC for Certificate)
of site and facility to construct up to 30 MW of wind electric)
generation in Antrim, New Hampshire and operate the same.)

MOTION TO COMPEL ANTRIM WIND, LLC TO RESPOND TO DATA REQUESTS BY JANICE DULEY LONGGOOD

Janice Duley Longgood, respectfully requests that the New Hampshire Site Evaluation Committee ("SEC" or "Committee") compel Antrim Wind, LLC ("AWE" or "Applicant") to respond to Janice Longgood's Data Requests in the above-captioned proceeding. In support of its motion, Janice Longgood states as follows:

1. Janice Duley Longgood petitioned to intervene in the above-captioned matter before the SEC. The Committee, through its *Order on Motions to Intervene* dated May 18, 2012, granted Janice Longgood permission to fully participate as an intervenor pursuant to RSA 541-A:32, II.
2. SEC Site 202.12 (a) provides "The presiding officer shall authorize data requests in the nature of interrogatories, requests for production of documents, requests for admission of material facts, depositions and any other discovery method permissible in civil judicial proceedings before a state court when such discovery is necessary to enable a party to acquire evidence admissible in a proceeding and when such method will not unduly delay the prompt and orderly conduct of the proceeding." In its May 18, 2012 *Report of Prehearing Conference and Procedural Order*, the Committee articulated the schedule and procedure for filing and responding to data requests.
3. Janice Longgood propounded data requests on the Applicant on June 1, 2012 per the procedural schedule. In total, nine (9) data requests were submitted to the Applicant.
4. On June 20, 2012, the Applicant provided responses to certain of the data requests and objected to others. The Applicant failed to answer two data requests, claiming the requested information was "unnecessary, unduly burdensome and unlikely to lead to discovery of admissible evidence."
5. The information sought by Janice Longgood is necessary and appropriate to permit her to fully and fairly present her case as a direct abutter to the proposed facility.

6. In request 1 and 2, Longgood requested visual simulations and a horizon profile from her home in the summer months (foliage) and the winter months (without foliage). I believe that the photo simulations contained in the Visual Impact Assessment are not complete and that as a direct property abutter, it is reasonable to request this data as Salmon Brook Road was not considered in the Visual Impact Assessment. I request the Committee compel the applicant to produce the simulations and profiles as described above.

7. Janice Longgood has requested the other parties to ascent to this motion.

Respectfully Submitted this 28th day of June, 2012



Janice Duley Longgood

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cc: Parties to Docket 2012-01