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July 9, 2012

Via Hand Delivery and Electronic Mail

Ms. Jane Murray, Secretary
New Hampshire Site Evaluation Committee
N.H. Department of Environmental Services
29 Hazen Drive
Concord, NH 03302-0095

***Re: Docket 2012-01 - Application of Antrim Wind Energy, LLC
for a Certificate of Site and Facility for a Renewable Energy Facility***

Dear Ms. Murray:

Enclosed for filing with the New Hampshire Site Evaluation Committee in the above-captioned matter please find an original and 9 copies of Applicant's Objection to Motion to Compel Antrim Wind, LLC to Respond to Data Requests by Janice Duley Longgood. Also enclosed for filing in the above-captioned matter please find an original and 9 copies of Applicant's Response to Partially Assented To Motion by Appalachian Mountain Club to Compel Response to Data Requests.

Please contact me if there are any questions about these filings. Thank you.

Very truly yours,



Susan S. Geiger

Enclosures

cc: Service List, excluding Committee Members
Clark A. Craig, Jr. (by first class mail)

899708_1

**THE STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE**

Docket No. 2012-01

Re: Antrim Wind Energy, LLC

**APPLICANT'S OBJECTION TO MOTION TO COMPEL
ANTRIM WIND, LLC TO RESPOND TO
DATA REQUESTS BY JANICE DULEY LONGGOOD**

NOW COMES Antrim Wind Energy, LLC ("AWE" or "the Applicant"), by and through its undersigned attorneys, and responds to the Motion to Compel filed by Janice Duley Longgood by stating as follows:

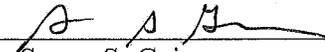
Ms. Longgood's Data Requests 1 and 2 seek visual simulations and a horizon profile from her home in the summer months and in the winter months. The Applicant objects to these requests. The Applicant believes that the photo simulations and other information contained in the Visual Impact Assessment ("VIA") adequately disclose the project's impacts within the 5 mile study area, which includes Ms. Longgood's residence. Granting Ms. Longgood's request would likely lead to additional requests for simulations at many other residences. Conducting such additional simulations is neither feasible nor appropriate. The viewshed maps contained in Figures 1 and 2 of the VIA (Application Appendix 9A) adequately disclose the extent of the Project's visibility at all locations within a 5 mile radius, and the photo simulations contained in the VIA are appropriate as they depict locations that were selected with input from local community members and for their relevance in addressing factors affecting visual impact (i.e. viewer/user groups, landscape units, distances zones and duration/frequency and circumstances of view).

Therefore, the Applicant respectfully objects to these requests on the grounds that they are unnecessary, unduly burdensome and unlikely to lead to the discovery of admissible evidence.

WHEREFORE, in view of the foregoing, the Applicant respectfully requests that the Committee:

- A. Deny Janice Duley Longgood's Motion to Compel; and
- B. Grant such further relief as it deems appropriate.

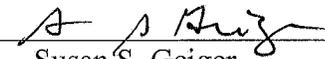
Respectfully submitted,
Antrim Wind Energy, LLC
By its Attorneys,
Orr and Reno, P.A.

By: 
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Dated: July 9, 2012

Certificate of Service

I hereby certify that on this 9th day of July, 2012, a copy of the foregoing Objection was sent by electronic mail or U.S. Mail, postage prepaid, to persons named on the Service List of this docket, excluding Committee Members.


Susan S. Geiger