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Admitted in NH and MA

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)

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**THE STATE OF NEW HAMPSHIRE**

**SITE EVALUATION COMMITTEE**

**Docket No. 2012-01**

**Re: Antrim Wind Energy, LLC**

**APPLICANT'S RESPONSE TO  
PARTIALLY ASSENTED TO MOTION BY APPALACHIAN MOUNTAIN CLUB  
TO COMPEL RESPONSE TO DATA REQUESTS**

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 the Appalachian Mountain Club ("AMC") by stating as follows:

1. AMC Data Request Nos. 1- 2 and 1-3 are related. They concern inquiries about the Project's visibility beyond the 5 mile radius study area, and seek information relative to visual impacts within a 10 mile radius from the turbine locations. AMC 1-2 seeks data or information used to justify the Applicant's statement "that natural conditions of atmospheric and linear perspective will mitigate potential visual impacts beyond 5 miles for this Project at this location, hence are not in need of further study." AMC 1-3 seeks a map and an expanded list of visual resources impacted to a 10 mile radius from the project that are not topographically or vegetatively screened, and the expected duration and number of turbines visible from those vantage points. This request also seeks the raw ARC-GIS data files used to generate Figures 1 and 2 in Appendix 9A of the Application. Although the Applicant believes that its 5 mile radius visual impact analysis is adequate and appropriate to support a determination that the Project will not have an unreasonable adverse effect on aesthetics, the Applicant nonetheless has agreed

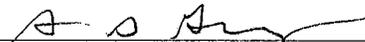
to create and provide a 10 mile radius viewshed map and to identify the major potential view points within that area. The Applicant has also agreed to provide the ARC- GIS data layers for the original viewshed analysis.

2. AMC Data Request No. 1-7 seeks data and assumptions for the Applicant's silence on commercially available technologies to mitigate the Project's visual impacts, including tower coloration and night time red lighting. This request also seeks correspondence and communications with vendors of these products and any cost estimates of deploying such technologies. The Applicant objects to providing details of correspondence and pricing with vendors of aviation lighting products. All pricing information is the result of confidential negotiations and is commercially sensitive information. In addition, it is irrelevant due to the fact that the technology is not currently approved by the Federal Aviation Administration ("FAA"), as the Applicant has explained at the technical sessions. The Applicant has agreed to provide copies of correspondence with the FAA dealing with potential use of an Audio Visual Warning System ("AVWS") at the project, as well as the contact at the FAA regarding AVWS proposals for the project.

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

- A. Deny AMC'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.

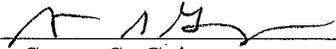
By:  \_\_\_\_\_

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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 Response was sent by electronic mail or U.S. Mail, postage prepaid, to persons named on the Service List of this docket, excluding Committee Members.

  
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Susan S. Geiger

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