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August 1, 2012

**Via U.S. and Electronic Mail**

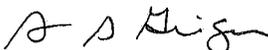
Ms. Jane Murray, Secretary  
New Hampshire Site Evaluation Committee  
N.H. Department of Environmental Services  
29 Hazen Drive  
Concord, NH 03302-0095

***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 Gregg Lake Association's Motion to Intervene. Please contact me if there are any questions about this filing. 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 OBJECTION TO  
GREGG LAKE ASSOCIATION'S  
MOTION TO INTERVENE**

NOW COMES Antrim Wind Energy, LLC ("AWE"), by and through its undersigned attorneys, and objects to the Motion to Intervene filed by the Gregg Lake Association ("GLA") by stating as follows:

1. GLA's Motion should be denied because it is untimely, not in the interests of justice, and will impair the orderly and prompt conduct of these proceedings. *See* RSA 541-A:32, I. and II.

2. GLA filed its Motion on July 23, 2012 - 83 days after the May 1, 2012 intervention deadline established by this Committee's Order and Notice of Prehearing Conference dated March 20, 2012. Such delay is inexcusable as AWE promptly caused the Order and Notice to be published in newspapers of general circulation statewide and in Hillsborough County, and caused additional notice to be published as required by the Committee's Order. *See* Affidavit of Susan Geiger (April 10, 2012.) Nineteen parties took notice and filed to intervene in a timely fashion. GLA has not asserted that it did not receive adequate notice, nor does it offer any explanation or justification for its lengthy delay in filing its Motion.

3. Granting the Motion will be unfair to the nineteen other parties that have followed the Committee's Order and Notice and timely filed for intervention. The addition of another party at this stage of the proceedings will cause potential delays and unnecessary complication for those parties, the Applicant and Counsel for the Public. The statutory deadlines established by RSA 162:H-6-a and 162:H-7 do not allow for this process to continue indefinitely. If interested parties may continue to intervene long after deadlines have elapsed, then the existing parties will be forced to continually adjust to a shifting slate of interested parties, settled issues may be re-raised at improper times, and the orderly and prompt conduct of these proceedings will be impaired. Moreover, allowing late-filed interventions sets a dangerous precedent, as it may encourage parties in future proceedings to deliberately delay their intervention requests in order to bog down the proceedings for projects they oppose.

4. If the Committee does grant GLA's Motion to Intervene, it should establish appropriate limitations under RSA 541-A:32, III to avoid injustice to the existing parties. GLA should be required to conform to the existing procedural schedule and should be required to accept the administrative record as it now stands. These limitations will help to minimize unnecessary burdens and delays that GLA's untimely intervention will create for the Committee and the existing parties.

WHEREFORE, AWE respectfully requests that the Presiding Officer:

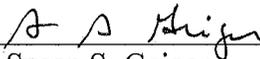
- A. Deny GLA's Motion to Intervene;
- B. In the alternative, if the Presiding Officer grants GLA's Motion to Intervene, the Committee should require GLA to conform to the existing schedule and to

accept the record as it now stands in order to minimize injustice to the existing parties; and

C. Grant such further relief as is deemed appropriate.

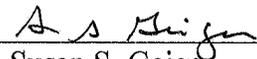
Date: August 1, 2012

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

By:   
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Certificate of Service

I hereby certify that on this 1<sup>st</sup> day of August, 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.

  
Susan S. Geiger.

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