

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

**In the matter of the
Application for Certification
Pursuant to RSA 162-H of
ANTRIM WIND ENERGY, LLC**

Docket No. 2012-01

**OBJECTION OF COUNSEL FOR THE PUBLIC TO
APPLICANT’S DATA REQUESTS AND MOTION TO QUASH**

Counsel for the Public, by his attorneys, the Office of the Attorney General, hereby objects to all of the Applicant’s Data Requests Propounded on Gregory Tocci, Jean Vissering, and Trevor Lloyd Evans and moves to quash all. In support hereof, Counsel for the Public respectfully represents as follows:

On May 18, 2012, the Chair entered a Report of Prehearing Conference and Procedural Order (the “Order”). In the Order the Chair provided the parties the opportunity to make data requests to other parties. Order at 2. The Order limited the number of such data requests by Applicant to **“50 to each party.”**

On August 8, 2012, the Applicant served three sets of data requests on Counsel for the Public. Those data requests were propounded on witnesses Trevor Lloyd Evans, Jean Vissering, and Gregory Tocci. The total number of those data requests (without beginning to analyze for subparts) is 72.

Counsel for the Public cannot determine which of the data requests to answer and thus objects to all of them, and notifies the Applicant hereby that he will not attempt to answer any of them.

