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August 29, 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

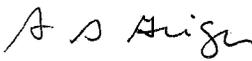
***Re: Docket 2012-01 - Application of Antrim Wind Energy, LLC
for a Certificate of Site and Facility for a Renewable Energy Facility***

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 Response to Motion of Counsel for the Public to Continue Hearing, Extend Deadlines, and Hold Scheduling Conference and to Industrial Wind Action Group's Motion to Postpone Hearing and Enlarge Time Period for Issuing or Denying a Certificate for the AWE, LLC Application.

Please note that because this filing concerns, among other things, extending the supplemental filing deadline of September 5, 2012, it would be very helpful to the numerous parties to this docket if an order regarding this matter could be issued as soon as possible.

Very truly yours,


Susan S. Geiger

Enclosures

cc: Service List, excluding Committee Members
Clark A. Craig, Jr. (by first class mail)
915929_1

THE STATE OF NEW HAMPSHIRE

SITE EVALUATION COMMITTEE

Docket No. 2012-01

Re: Antrim Wind Energy, LLC

APPLICANT'S RESPONSE TO
MOTION OF COUNSEL FOR THE PUBLIC TO CONTINUE HEARING,
EXTEND DEADLINES, AND HOLD SCHEDULING CONFERENCE
AND TO
INDUSTRIAL WIND ACTION GROUP'S MOTION TO POSTPONE HEARING
AND ENLARGE TIME PERIOD FOR ISSUING OR DENYING A
CERTIFICATE FOR THE AWE, LLC APPLICATION

NOW COMES Antrim Wind Energy, LLC ("AWE" or "the Applicant"), by and through its undersigned attorneys, and responds to the above-referenced Motions filed by Counsel for the Public and Industrial Wind Action Group ("IWAG") by stating as follows:

1. The Applicant does not object to a postponement of the commencement of the adjudicative hearings in this docket until at least October 15, 2012, so long as the deadline for all parties' supplemental filings and the date of the final prehearing conference are extended beyond the current dates of September 5, 2012 and September 7, 2012, respectively, and so long as the deadline for the Site Evaluation Committee's ("SEC" or "Committee") order is not delayed beyond November 30, 2012.
2. For purposes of developing adjustments to the current procedural schedule in light of the foregoing, the Applicant respectfully requests that the parties to this docket and Counsel for the Committee participate in a structuring conference immediately following the oral argument on the subdivision issue that is scheduled for September 6, 2012.

3. As indicated in Counsel for the Public's Motion, the undersigned counsel contacted the parties to this proceeding via electronic mail on August 27, 2012 concerning the Applicant's position outlined above, and Counsel for the Public has indicated that he is comfortable with it.

4. Counsel for the Public's assertions in paragraph 12 of his Motion imply that if the Committee denies the Applicant's request for subdivision approval, the Project cannot be built. The Applicant strongly disagrees. Although the Applicant has indicated it will pursue its legal remedies or other solutions should the Committee determine that it does not have authority to grant the Applicant's subdivision request, the adjudicative hearings should not be delayed for that reason. The Committee should proceed with the adjudicative process in this docket notwithstanding the possibility that the Applicant may need to take additional steps to resolve the subdivision issue prior to construction. *See, e.g.,* RSA 162-H:16, VII. (SEC may condition the certificate upon the results of required federal and state agency studies whose study period exceeds the application period.)

WHEREFORE, AWE respectfully requests that the Presiding Officer issue an order prior to August 31, 2012 that:

- A. Schedules a structuring conference to be held September 6, 2012 immediately following the scheduled oral argument in this docket;
- B. Extends the deadline for all parties' supplemental filings beyond September 5, 2012;
- C. Extends the date of the final prehearing conference beyond September 7, 2012;

- D. Postpones the commencement of the adjudicative hearings in this docket until at least October 15, 2012;
- E. Extends the deadline for the Committee's order from October 31, 2012 to no later than November 30, 2012; and
- F. Grants such further relief as is deemed appropriate.

Date: August 29, 2012

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

By:  (for)

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Certificate of Service

I hereby certify that on this 29th day of August, 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.


Susan S. Geiger