

October 24, 2012

Via Hand Delivery
Ms. Jane Murray, Secretary
New Hampshire Site Evaluation Committee
New Hampshire Department of Environmental Services
P.O. Box 95
29 Hazen Drive
Concord, NH 03302-0095

**Re: Docket No. 2012-001 Application of Antrim Wind Energy, LLC for a
Certificate of Site and Facility for a Renewable Energy Facility**

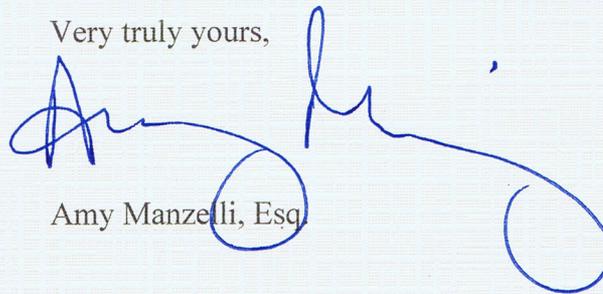
Dear Ms. Murray,

Enclosed please find for filing in this matter the original and fifteen (15) copies of the following:

1. My appearance as counsel for the Audubon Society of New Hampshire;
2. Motion of The Audubon Society of New Hampshire for Late Entry of "First Supplemental Pre-Filed Direct Testimony of Paul Nickerson on Behalf of the Audubon Society of New Hampshire"; and
3. First Supplemental Pre-Filed Direct Testimony of Paul Nickerson on Behalf of the Audubon Society of New Hampshire.

Please contact me with any questions or further needs.

Very truly yours,



Amy Manzelli, Esq.

Cc: Service List
Encl.



THE STATE OF NEW HAMPSHIRE
BEFORE THE
SITE EVALUATION COMMITTEE

DOCKET NO. 2012-01

APPLICATION OF ANTRIM WIND ENERGY, LLC
FOR A CERTIFICATE OF SITE AND FACILITY

**MOTION OF AUDUBON SOCIETY OF NEW HAMPSHIRE
FOR LATE ENTRY OF
“FIRST SUPPLEMENTAL PRE-FILED DIRECT TESTIMONY OF
PAUL NICKERSON
ON BEHALF OF THE AUDUBON SOCIETY OF NEW HAMPSHIRE”**

The Audubon Society of New Hampshire, by and through its attorneys, BCM Environmental & Land Law, PLLC, moves for late entry of the “First Supplemental Pre-Filed Direct Testimony of Paul Nickerson on Behalf of the Audubon Society of New Hampshire,” (“Supplemental Testimony”) and states as follows in support of its motion:

1. Paul Nickerson timely filed his pre-filed testimony and attachments on July 31, 2012.
2. His Supplemental Testimony regards the applicant’s proposed conservation plan and the position of Audubon’s Sanctuaries and Land Management Committee, in part in response to inquiries Counsel to the Public, Senior Assistant Attorney General Peter C. L. Roth, made at the technical session on August 24, 2012.
3. The deadline to have timely filed his Supplemental Testimony passed on October 11, 2012.
4. Due to a serious and ongoing personal situation of Attorney David Howe, who has also appeared for Audubon, Mr. Nickerson did not timely file his Supplemental Testimony.

5. Another witness of Audubon's, Ms. Frances Von Mertens, had intended to timely file supplemental testimony substantively similar to Mr. Nickerson's Supplemental Testimony. However, Attorney David Howe apparently did not coordinate with Ms. Von Mertens either: the October 11, 2012 deadline; or her unavoidable plan to be in South Africa during the rescheduled adjudicatory hearing commencing on October 26, 2012.

6. Immediately following when Audubon realized this on Friday, October 19, 2012, undersigned was contacted. Since then, the Board of Audubon met and voted to retain undersigned, and undersigned prepared and filed the instant motion.

7. The applicant will not be prejudiced by the late entry of Mr. Nickerson's Supplemental Testimony. The applicant already does or should know of Audubon's opinion of the conservation plan based on its participation in the technical session and its original pre-filed testimonies.

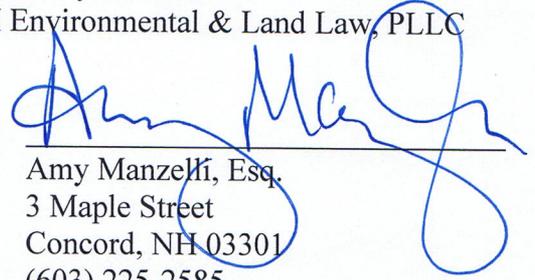
8. Because of this arising out of circumstances beyond Audubon's control and the absence of any prejudice, justice would be served by accepting the late entry of his Supplemental Testimony.

9. Due to the late nature of undersigned's services being sought, undersigned has regrettably been unable to contact all parties for assent on the motion.

Respectfully Submitted
BCM Environmental & Land Law, PLLC

Dated: October 24, 2012

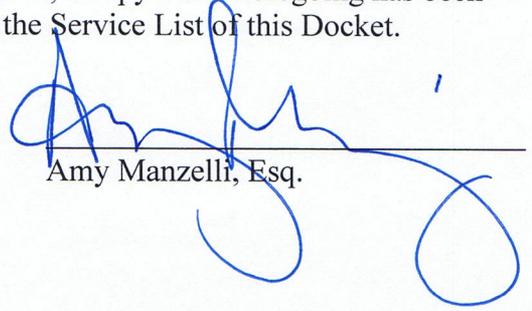
By:



Amy Manzelli, Esq.
3 Maple Street
Concord, NH 03301
(603) 225-2585
manzelli@nhlandlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of October 2012, a copy of the foregoing has been sent via e-mail or first class mail to the parties named in the Service List of this Docket.



Amy Manzelli, Esq.