



Susan S. Geiger  
sgeiger@orr-reno.com  
Direct Dial 603.223.9154  
Direct Fax 603.223.9054  
Admitted in NH and MA

April 29, 2013

***Via Hand-Delivery. and Electronic Mail***  
New Hampshire Site Evaluation Committee  
c/o Ms. Jane Murray, Secretary  
29 Hazen Drive  
P.O. Box 95  
Concord, NH 03302-0095

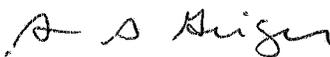
***Re: Docket 2012-01, Application of Antrim Wind Energy, LLC***

Dear Ms. Murray:

Enclosed for filing in the above-referenced docket, please find an original and 9 copies of Applicant's Objection to IWAG's Motion to Prohibit Post-Hearing Submissions.

Please let me know if there are any questions about this filing. Thank you.

Very truly yours,

  
Susan S. Geiger

cc: Service List (electronic mail only)  
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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 IWAG  
MOTION TO PROHIBIT POST-HEARING SUBMISSIONS**

NOW COMES Antrim Wind Energy, LLC ("AWE" or "the Applicant"), by and through its undersigned attorneys, and objects to the Industrial Wind Action Group's Motion to Prohibit Post-Hearing Submissions by Antrim Wind LLC from Becoming Part of the Record and to Strike the Submission by ClimateCounts.Org ("IWAG's Motion") by stating as follows:

1. At the outset it should be noted that IWAG's Motion does not comply with N.H. Admin. Rules Site 202.14 (d) and (e) as it does not indicate IWAG's good faith effort to obtain concurrence with the relief sought, its caption does not state whether it is assented-to or contested, and the body of the motion does not identify the positions of other parties. For these reasons alone, IWAG's Motion should be denied.

2. IWAG's Motion requests that the Applicant's April 25, 2013 letter containing information that updates section B. 4 of AWE's application (i.e. the appointment of Mr. Steve Schauer to the positions of Executive Officer of Antrim Wind Energy, LLC and President of Westerly Antrim, LLC) be excluded from the record of this proceeding. IWAG's Motion argues that the "change in personnel at Antrim Wind Energy, LLC and Westerly Antrim, LLC is entirely irrelevant to the above-captioned matter and should be withheld from the record." IWAG's Motion, ¶ 3.

3. IWAG's Motion must be denied as it overlooks the fact that the purpose of the letter was to comply with RSA 162-H:7, IX which requires an applicant to immediately inform the Site Evaluation Committee ("SEC") of any substantive modification to its application. As of May 1, 2013, the information contained in section B.4 of AWE's application will no longer be accurate. Accordingly, the updated information was provided to comply with RSA 162-H:7, IX.

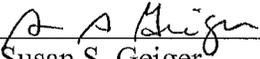
4. IWAG's Motion argues that any information beyond Mr. Schauer's name and titles "would be extraneous and should be withheld from the record." IWAG's Motion, ¶ 4. Contrary to IWAG's assertions, this information is not extraneous; it updates and corrects information about the Westerly management team found at page 54 of the Application. As stated above, the information was provided to comply with RSA 162-H:7, IX.

5. IWAG's request to strike the public comment letter filed by ClimateChange.org must be denied as it overlooks the provisions of RSA 162-H:10, III which require the SEC to "consider and weigh" information submitted by members of the public "before, during and *subsequent to* public hearings." (Emphasis added.) In view of the foregoing statute, the fact that this public comment letter was submitted subsequent to the conclusion of the hearings in this docket is an invalid basis for striking it from the record.

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

- A. Deny IWAG's Motion; and
- B. Grant such further relief as it deems appropriate.

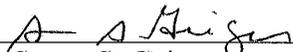
Respectfully submitted,  
**Antrim Wind Energy, LLC**  
By its Attorneys,  
Orr and Reno, P.A.

By:   
Susan S. Geiger  
One Eagle Square  
P.O. Box 3550  
Concord, NH 03302-3550  
603-223-9154  
[sgeiger@orr-reno.com](mailto:sgeiger@orr-reno.com)

Dated: April 29, 2013

Certificate of Service

I hereby certify that on this <sup>29<sup>th</sup></sup> day of April, 2013, 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, excluding Committee Members.

  
Susan S. Geiger

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