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Admitted in NH and MA

July 2, 2013

VIA HAND-DELIVERY

New Hampshire Site Evaluation Committee
c/o Ms. Jane Murray, Secretary
29 Hazen Drive
P.O. Box 95
Concord, NH 03302-0095

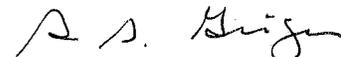
Re: Docket 2012-01, Application of Antrim Wind Energy, LLC

Dear Ms. Murray:

Enclosed for filing in the above-referenced docket, please find an original and 9 copies of Applicant's Unassented-To Motion to Strike Intervenor Gregg Lake Association's Late-Filed Submission.

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)
1029471_1.DOC

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

DOCKET NO. 2012-01

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

APPLICANT'S UNASSENTED-TO MOTION TO STRIKE
INTERVENOR GREGG LAKE ASSOCIATION'S LATE-FILED SUBMISSION

NOW COMES Antrim Wind Energy, LLC ("AWE" or "the Applicant") by and through its undersigned attorneys, and respectfully moves the New Hampshire Site Evaluation Committee ("Committee" of "SEC") to strike from the record of this proceeding the letter from Intervenor Gregg Lake Association ("Gregg Lake") dated June 28, 2013 in which Gregg Lake objects to the Applicant's motion for rehearing and motion to re-open the record in this case. In support of this motion, the Applicant states as follows:

1. On July 26, 2012, Gregg Lake filed an untimely intervention motion to which the Applicant objected in writing on August 1, 2012.
2. The Presiding Officer issued an order on August 22, 2012 recognizing that Gregg Lake's motion to intervene was "exceedingly late in the proceedings" and therefore limited Gregg Lake's participation in the docket to cross-examining witnesses at the adjudicative hearings, and making its argument as to whether or not the Subcommittee should grant or deny a Certificate of Site and Facility. *Order on Outstanding Motions* (Aug. 22, 2012) at 19.
3. Gregg Lake did not participate in the adjudicative hearings in this docket.

4. The Applicant filed a timely motion for rehearing in this docket on June 3, 2013 and some parties (other than Gregg Lake) filed objections on or before June 13, 2013 in accordance with the 10-day deadline established by N.H. Admin. R. Site 202.14 (f).

5. On June 28, 2013, Gregg Lake, through its President, Jeanne M. Baker, filed a letter in this docket reporting the results of a vote taken by Gregg Lake members concerning whether to support the AWE project, and urging “to let stand the earlier SEC decision” and requesting “that the matter not be re-opened.” The letter constitutes an untimely objection to the Applicant’s motion for rehearing and motion to re-open the record in this docket. This correspondence cannot be viewed as “public comment” because Gregg Lake is an intervenor in this docket. In addition, copies of the motion were not served by Gregg Lake upon the Applicant as required by N.H. Admin. R. Site 202.07. In view of the foregoing, the letter should be stricken from the record of this proceeding.

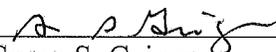
6. Pursuant to N.H. Admin. R. Site 202.14 (d) and (e), the undersigned has contacted the parties to this proceeding by electronic mail in an effort to obtain concurrence with the relief sought herein. The following responses to the request for concurrence were received prior to the filing of the within motion: the Town of Antrim, Gordon Webber and Marie Harriman concur; the Edwards-Allen joint intervenors dissent; Windaction.org does not agree; Robert Southall, Katharine Sullivan, the Abutter Intervenors and North Branch Intervenors do not concur; and NH Audubon does not assent.

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

- A. Strike from the record of this proceeding the letter dated June 28, 2013 from Gregg Lake Association; and
- B. Grant such further relief as it deems appropriate.

Respectfully submitted,

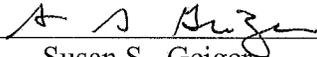
Antrim Wind Energy, LLC
By its attorneys,
ORR & RENO, P.A.
One Eagle Square
P.O. Box 3550
Concord, NH 03302-3550

By: 
Susan S. Geiger
Telephone: (603) 223-9154
Email: sgeiger@orr-reno.com

July 2, 2013

Certificate of Service

I hereby certify that on this 2nd day of July, 2013, a copy of the foregoing Motion was sent by electronic 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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