

January 10, 2014

Site Evaluation Committee
N.H. Department of Environmental Services
29 Hazen Drive
Concord, New Hampshire 03302-0095

RE: SEC Docket No. 2013-02: Application of Atlantic Wind, LLC for a Certificate of Site and Facility for the Wild Meadows Wind Project

Dear Commissioner Ignatius:

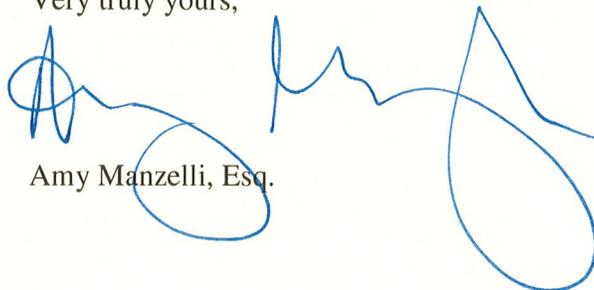
Enclosed for filing in the above-referenced docket, please find an original and 18 copies of the following pleadings:

1. Petition to Intervene of NHWindWatch;
2. Appearances of Attorneys Amy Manzelli and Jason D. Reimers; and
3. Partially Assented-to Motion of NHWindWatch to Join the Motion of Wild Meadows Legal Fund to Deem the Application of Atlantic Wind, LLC Incomplete.

We file items 2 and 3 now because they are time-sensitive. However, we recognize that their filing is contingent upon the decision of the Petition to Intervene.

Thank you for your attention to this matter. Please contact me if you have any questions about these filings.

Very truly yours,



Amy Manzelli, Esq.

cc: Clients
Michael J. Iacopino, Esq.
Barry Needleman, Esq.
Patrick H. Taylor, Esq.
Sherilyn Burnett Young, Esq.
Michael S. Lewis, Esq.
Eric W. Macaux, Esq.
Mary Maloney, Esq.



STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE

Docket No. 2013-02

Application of Atlantic Wind, LLC for a Certificate of Site and Facility
for the Wild Meadows Wind Project

**PARTIALLY ASSENTED-TO MOTION OF NHWINDWATCH TO JOIN THE
MOTION OF WILD MEADOWS LEGAL FUND
TO DEEM THE APPLICATION OF ATLANTIC WIND, LLC INCOMPLETE**

NHWindWatch, by and through its attorneys, BCM Environmental & Land Law, PLLC, respectfully joins in the motion of the Wild Meadows Legal Fund to deem incomplete the application of Atlantic, Wind, LLC, dated January 7, 2014 (Motion), as follows.

1. “All entities planning to construct facilities in the state [are] required to provide full and complete disclosure to the public of such plans.” RSA 162-H:1.
2. The siting process pursuant to RSA 162-H requires that part of the “full and complete disclosure to the public” include information that the Application has control of the full extent of the site, and details of the manner of such control. See RSA 162-H:7, IV (applications “shall contain sufficient information to satisfy the application requirements of each state agency having jurisdiction . . . and shall include each agency’s completed application forms”); RSA 162-H:7, V(b) (applications “shall” “[i]dentify both the preferred choice and any other choices for the site of each major part of the proposed facility”); Site 301.03(b)(6) (applications “shall include” “whether the applicant is the owner or lessee of the site or facility or has some legal or business relationship to it”); Site 301.03(c)(2) (applications “shall contain” “[s]ite acreage, shown on an attached property map and located by scale on a U.S. Geological Survey or GIS map”); Site 301.03(c)(3) (applications “shall contain” “location of residences, industrial buildings, and other

structures and improvements within or adjacent to the site”); Site 301.03(d)(2) (applications “shall include information about other required applications and permits as follows: [d]ocumentation that demonstrates compliance with the application requirements of such agencies”).

3. The application of Atlantic Wind, LLC, fails to fully and completely disclose the requisite site control, especially with respect to the interconnection transmission line and substation.

4. Pursuant to Site 202.14, counsel for Atlantic Wind, LLC, does not assent to this Motion, Counsel for the Public has not responded to a request for assent to this Motion, and Counsel for Wild Meadows Legal Fund assents to this Motion.

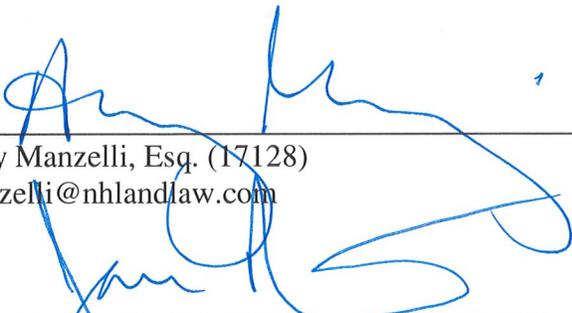
WHEREFORE, NHWindWatch respectfully joins in the request that the designated Chairperson determine that the Application of Atlantic Wind, LLC, is incomplete and issue an order pursuant to Site 301.05 to require the Applicant to augment its Application to identify the particular parcels of land over which it intends its interconnection transmission lines to run and where the substation will be constructed, identify the residences and other structures within and abutting the Project site, and demonstrate that it has the necessary legal rights to build the entire Project on the proposed site.

Respectfully Submitted,

NHWINDWATCH

By its Attorneys,

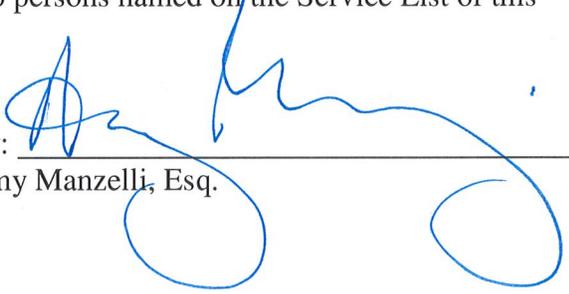
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By: 
Jason Reimers, Esq. (17309)
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CERTIFICATE OF SERVICE

I hereby certify that on this day, January 10, 2014, a copy of the foregoing motion sent by electronic mail or U.S. Mail, postage prepaid, to persons named on the Service List of this docket.

By: 
Amy Manzelli, Esq.