

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:

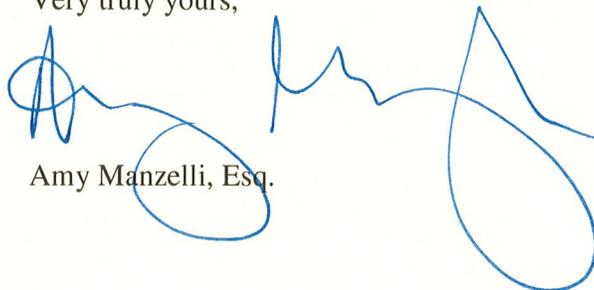
Enclosed for filing in the above-referenced docket, please find an original and 18 copies of the following pleadings:

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

PETITION OF NHWINDWATCH TO INTERVENE

NHWindWatch, by and through its attorneys, BCM Environmental & Land Law, PLLC, respectfully petitions the New Hampshire Site Evaluation Committee (SEC) to intervene in the above-captioned proceedings pursuant to Site 202.11 and RSA 541-A:32, as follows:

1. On December 12, 2013, Atlantic Wind, LLC (“Atlantic Wind”), owner and developer of the Wild Meadows Wind Project, filed an application to develop a 75.9 megawatt (MW) wind energy facility consisting of 23 wind turbines of 3.3 MW each, situated along the ridgelines in Alexandria and Danbury, New Hampshire.
2. NHWindWatch is a member-based nonprofit organization in the Newfound Lake region comprised of approximately 2,000 members.
3. NHWindWatch is dedicated to providing education and information about industrial wind power projects.
4. The Board of Directors of NHWindWatch is comprised of the following individuals:

<u>Name and Address</u>	<u>Title</u>
Lori Lerner 43 Cottage City Rd., Bridgewater, NH 03222	President
Nancy Watson 35 Stone Glade Lane, Groton, NH 03241	Vice President

Carole Binder 15 Starr Ave. East, Andover, MA 01810	Treasurer
Betsy Schneider 36 Pikes Point Rd., Bristol, NH 03222	Asst. Treasurer
Russell Blair 69 King St., Norfolk, MA 02056	Secretary
Joe Wilkas 459 High St., Walpole, MA 02081	General Board

5. All Board members, core volunteers, and a significant portion of the general membership own property located either in close proximity to the proposed project site, or in an area nearby enough to be impacted by the proposed project.

6. Many members of NHWindWatch recreate in the properties that comprise the site and in nearby areas including Cardigan Mountain and Newfound Lake, including snowmobiling, hiking, hunting, and swimming.

7. Many members of NHWindWatch will experience unobstructed views of the proposed project from home, or from where they recreate in the area.

8. Amongst the sound, aesthetic, environmental, property value, economic, and other expected impacts of the proposed project, members of NHWindWatch will be specifically impacted because of the proximity of the proposed project to their homes and recreational areas.

9. Site 202.11(a) provides that “[p]ersons seeking to intervene in a proceeding shall file petitions with the committee” Site 202.11(b) provides that “[t]he presiding officer shall grant a petition to intervene if:

(1) The petition is submitted in writing to the presiding officer, with copies mailed to all parties named in the presiding officer’s order of notice of the hearing, at least three days before the hearing;

(2) The petition states facts demonstrating that the petitioner’s rights, duties, privileges, immunities or other substantial interests

might be affected by the proceeding or that the petitioner qualifies as an intervenor under any provision of law; and

(3) The presiding officer determines that the interests of justice and the orderly and prompt conduct of the proceedings would not be impaired by allowing the intervention.”

See also RSA 541-A:32 (imposing identical standard by statute).

10. NHWindWatch has met the requirements of Site 202.11(b).

WHEREFORE, NHWindWatch respectfully requests the designated Chairperson to grant this petition to intervene.

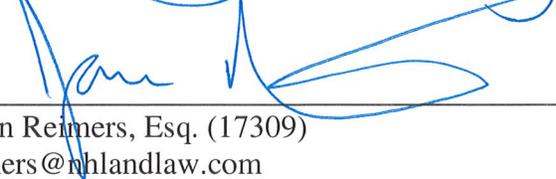
Respectfully Submitted,

NHWINDWATCH

By its Attorneys,
BCM Environmental & Land Law, PLLC
3 Maple Street
Concord, NH 03301
(603) 225-2585

By: 

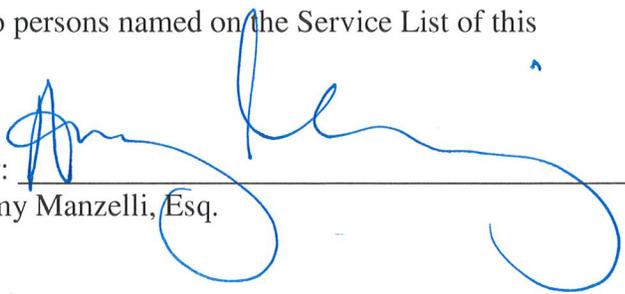
Amy Manzelli, Esq. (17128)
manzelli@nhlandlaw.com

By: 

Jason Reimers, Esq. (17309)
reimers@nhlandlaw.com

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.