

**STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE**

RE: Motion of Granite Reliable Power, LLC to Amend a Certificate of)
Site and Facility with Expedited Relief - SEC Docket 2014-03)

PETITION TO INTERVENE *PRO SE* OF THE WINDACTION GROUP

Pursuant to the New Hampshire Site Evaluation Committee Rules Site 202.11, The Windaction Group¹ (“Windaction”) hereby petitions to intervene *pro se* in the above-referenced proceeding.

In support of its Petition to Intervene, Windaction offers the following arguments:

(1.) Windaction can demonstrate a substantial interest which may be affected by the outcome of the proceeding.

The Site Evaluation Committee ("Committee") previously granted Windaction full intervenor status on Dockets Nos. 2008-04 and 2010-03. Windaction's substantial interests in issues pertaining to this matter have not changed since the Committee approved the project.

(2.) The intervention of Windaction will be in the interest of justice and will not impair the orderly and prompt conduct of the proceedings by allowing the intervention.

The Committee has granted Windaction intervention status on four separate SEC dockets pursuant to RSA 541-A:32, II². Our representative, Lisa Linowes has provided expert testimony on the Timbertop Wind application (Docket No. 2012-04) and currently represents an intervenor group before the Committee in the Groton Wind enforcement proceeding (Docket No. 2010-01). We respect the importance of conducting this proceeding in an orderly manner that will not unduly delay the Committee or the parties in reaching an outcome. There is no history of Windaction abusing the privilege of intervention. We believe our representative, Lisa Linowes has the requisite knowledge to contribute to the

¹ The WindAction Group is also known as the Industrial Wind Action Group.

² Docket No. 2006-01 (Lempster Wind, LLC), No. 2008-04 (Granite Reliable Wind, LLC), No. 2010-03 (Brookfield Renewable Power Inc), and No. 2012-01 (Antrim Wind, LLC). While Windaction believes it meets the criteria under Site 202.11(b)(2) for Intervention, we recognize that the Committee has consistently disagreed. We respect the Committee's position on this matter and limit our arguments to RSA 541-A:32, II.

process in a material way that will benefit the Committee. Ms. Linowes has written and spoken extensively on the topic of wind energy development and its impact on the natural environment, local communities and energy markets.

As an intervenor in the initial Docket No. 2008-04 (Granite Reliable Wind, LLC), Ms. Linowes is very aware of the High Elevation Mitigation Settlement Agreement and the intent of the parties at the time. We are concerned that several assertions made by Brookfield Renewable Power, Inc. ("Brookfield") in its March 11, 2014 motion and the later reply letter to Counsel for the Public (April 3, 2014) are inconsistent with representations made by Noble Environmental in 2009. Further, the amended re-vegetation plans included with the motion do not provide specific details as to the extent of the new impacts or why Brookfield's revisions offer "similar or greater benefits as the relevant re-vegetation requirements in the original Mitigation Plan."

Windaction has no interest in expanding the scope of review in this docket. However, we do believe that the Committee's decisions must be made based on the best available information. Windaction is prepared to work closely with other parties to the proceeding in the interest of maintaining order and respectfully offers that the Windaction's participation, if permitted, would be in the interest of justice.

Pursuant to the Committee's March 13, 2014 Order, Windaction files this Petition to Intervene by the deadline set forth by the Committee for Docket 2014-03 and requests that it be permitted to intervene with full standing to participate in all phases and activities of the proceeding.

Dated this 7th day of April, 2014.

Respectfully submitted,



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for the Windaction Group
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