

**STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE**

**APPLICATION OF GRANITE RELIABLE POWER, LLC
NO. 2014-03**

OBJECTION OF THE WINDACTION GROUP TO MOTIN FOR IN CAMERA REVIEW

The Windaction Group, through its representative, Lisa Linowes, respectfully objects to Granite Reliable Power LLC's ('Applicant') Motion for In Camera Review To Determine Discoverability of its Safety Plan. We concur with the arguments set forth in the objection filed by Counsel for the Public and will not duplicate his statements in this filing. In addition, we wish to explain our reasons for why the Safety Plan is important for our review.

At the May 1, 2014 prehearing conference, Ms. Linowes informed the parties, including the Applicant's attorneys, that it would be seeking various reports to determine if there were any prohibitions on certain kinds of vegetation and the placement of the vegetation. Ms. Linowes cited the safety plan in particular. (See Transcript 5/1 pg 69 ln 1-24) At the time, the parties acknowledged the safety plan existed and no objection was raised regarding the plan being provided. We do not believe our data request for the safety plan in any way attempts to broaden the scope of the proceeding nor are we interested in relitigating issues that have already been settled. The Windaction Group is willing to adhere to a protective order in this matter if it is the desire of the Committee and the Applicant that the document be kept confidential.

Respectfully submitted this day of August 18, 2014



The Windaction Group

cc: Parties to Docket 2014-03