

January 12, 2016

Robert Scott, Chairman
c/o Pamela G. Monroe, Administrator
New Hampshire Site Evaluation Committee
21 South Fruit Street, Suite 10
Concord, New Hampshire 03301-2429

pamela.monroe@sec.nh.gov

RE: Docket No. 2015-02 Application of Antrim Wind Energy, LLC for a Certificate of Site and Facility

Dear Chairman Scott,

Attached please find for filing in this matter the Motion to Intervene of Annie Law and Robert Cleland.

Sincerely,

Annie Law & Robert Cleland
43 Farmstead Rd.
Antrim, New Hampshire 03440

**STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE**

RE: Application for a Certificate of Site and Facility)
By Antrim Wind Energy, LLC)
SEC Docket Number 2015-02)

MOTION TO INTERVENE *PRO SE* OF Annie Law and Robert Cleland

Pursuant to the New Hampshire Site Evaluation Committee Rules Site 202.11 and ~~R.S.A.~~ 541 Annie Law and Robert Cleland hereby move for permission to intervene *pro se* in the above-referenced proceeding. In support of our Motion to Intervene, Annie Law and Robert Cleland offer the following arguments:

(1.) Annie Law and Robert Cleland can demonstrate a substantial interest, which may be affected by the outcome of the proceeding.

We petitioned for and were granted Intervenor status in the Antrim Wind Energy, LLC's prior cases before the Committee (SEC Dockets 2011-02, 2012-01, and 2014-05). We live on Windsor Mountain, within 1.5 miles directly across the valley from the proposed wind facility, with a full view of the ridgeline from Tuttle Hill all the way to Bald Mt. We are concerned about the destruction of the habitat of wild animals and birds that we see on a daily basis, the reduction in our property values, the noise of the proposed wind turbines and also what the overall effects will be on our health due to the proximity of the site.

(2.) The interest of Annie Law and Robert Cleland will not be adequately protected by other parties.

In exercising its discretion, we respectfully ask that the Committee consider whether our interest will be adequately protected by other parties. Since we, as residents of the North Branch region of Antrim where the proposed wind facility would be constructed, are concerned that our interests have not been fairly addressed thus far by the Town Boards of Antrim, we do not believe that any other party to this proceeding can adequately represent our interests in proceedings before the Committee.

(3.) The intervention of Annie Law and Robert Cleland will be in the interest of justice and will not impair the orderly and prompt conduct of the proceedings by allowing the intervention.

We petitioned for and were granted Intervenor status in Antrim Wind Energy, LLC's prior cases before the Committee (SEC Dockets 2011-02, 2012-01, and 2014-05) and as such understand and respect the hearing process. Pursuant to the SEC Order of December 4, 2015, Annie Law and Robert Cleland file this Motion to Intervene by the deadline set forth by the Committee for Docket 2015-02 and request that we be permitted to intervene with full standing to participate in all phases and activities of the proceeding. 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. We are prepared to work closely with other parties to the proceeding in the interest of maintaining order and respectfully offer that our participation, if permitted, would be in the interest of justice.

Dated this 12th day of January, 2016.

Respectfully submitted,

Annie Law and Robert Cleland
43 Farmstead Rd.
Antrim, NH 03440
603-588-3157