



January 15, 2016

The Honorable Robert R. Scott, Chairman
New Hampshire Site Evaluation Committee
c/o New Hampshire Public Utility Commission
21 South Fruit Street, Suite 10,
Concord, N.H. 03301-2429

**Re: Application of Antrim Wind Energy, LLC for a Certificate of Site and Facility
DOCKET 2015-02**

Dear Sub-committee Chairman Scott:

In accordance with your December 4, 2015 procedural order in the above referenced matter, please find enclosed the timely petition for intervention submitted by the Windaction Group.

Thank you for the opportunity to participate in this docket. If you have any questions, please do not hesitate to contact me by phone at 603-838-6588 or e-mail at llinowes@windaction.org.

Sincerely,

Lisa Linowes
for The Windaction Group

cc: Parties to Docket 2015-02 via electronic mail

**STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE**

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

PETITION TO INTERVENE BY THE WINDACTION GROUP

Pursuant to the New Hampshire Site Evaluation Committee (“Committee” or “SEC”) Rule Site 202.11 and the Committee’s December 4, 2015 Order, the Windaction Group (“Windaction”) files this Petition to Intervene in the above-referenced proceeding. Windaction respectfully requests that it be permitted to intervene with full standing to participate in all phases and activities of the proceeding. In support of its Petition, Windaction offers the following arguments:

1. Windaction is a national organization incorporated under the laws of the State of New Hampshire since 2006. Windaction is dedicated to the research and public education of wind energy development, its costs and impacts on communities, the environment and the regional grid. Windaction subscribers number well over 4,000 with many residing within the ISO-NE control area, including subscribers who neighbor the proposed Antrim project site. Our subscribers have a strong interest in ensuring wind energy proposals are considered in a deliberate and comprehensive manner with a keen focus on those issues articulated under NH RSA 162-H.
2. The health, environmental and economic consequences of this project could prove significant. We believe our subscribers who will be impacted have a right to participate in this proceeding in order to inform the Committee of their interests.
3. The evidentiary record that will be created in this docket and any resulting Committee orders are likely to influence future wind energy applications in New Hampshire and other jurisdictions outside the state. As such, the outcome of this proceeding substantially affects Windaction’s mission.

4. The Antrim Wind application is the first wind energy proposal to be subject to the new SEC rules adopted in December 2015. Windaction actively participated in the rulemaking process and our representative, Lisa Linowes, is well versed in many of the technical details contained in the rules. Windaction strongly supports the SEC Site rules addressing wind energy applications and we believe them to be fair and reasonable. We have a substantial interest in ensuring the new rules are successfully applied.
5. The interests of Windaction and its subscribers will not be adequately represented by any other party to this proceeding.
6. The intervention of Windaction will be in the interest of justice and will not impair the orderly and prompt conduct of the proceedings. The Committee has granted Windaction intervention status in other SEC dockets¹. Ms. Linowes has also provided expert testimony on the Timbertop Wind application (Docket No. 2012-04) and represented an intervenor group before the Committee in the Groton Wind enforcement proceeding (Docket No. 2010-01). While Windaction believes it meets the criteria for intervenor status pursuant to RSA 541-A:32, I, we also recognize that the Committee has ruled in favor of our petitions pursuant to RSA 541-A:32, II. In that regard, Windaction respects 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 Ms. Linowes will contribute to the docket in a material and positive way that will benefit the Committee and the process. Windaction is prepared to work closely with other parties to the proceeding in the interest of maintaining order. Windaction's participation, if permitted, would be in the interest of justice.

¹ Docket No. 2006-01 (Lempster Wind, LLC), No. 2008-04 (Granite Reliable Wind, LLC), No. 2010-03 (Brookfield Renewable Power Inc), No. 2012-01 (Antrim Wind, LLC), No. 2014-05 (Antrim Wind, LLC).

7. Lisa Linowes is the execution director of the Windaction Group and is authorized to represent Windaction's interests in this proceeding. All notices and correspondence pertaining to Docket 2015-02 should be sent to the following:

Lisa Linowes, executive director
The Windaction Group
286 Parker Hill Road
Lyman, NH 03585
(603) 838-6588
lisa@linowes.com or lilinowes@windaction.org

WHEREFORE, Windaction requests leave to intervene in this proceeding to protect its interests and the interests of its subscribers.

DATED this 15th day of January, 2016

Respectfully submitted,

THE WINDACTION GROUP

By:



Lisa Linowes

286 Parker Hill Road
Lyman, NH 03585
(603) 838-6588

cc: Parties to Docket 2015-02 via electronic mail