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Admitted in: NH

July 11, 2019

Via Electronic Mail Only

Pamela G. Monroe, Administrator
New Hampshire Site Evaluation Committee
21 South Fruit Street
Suite 10
Concord, NH 03301

Re: Antrim Wind Energy, LLC
Antrim, NH

Dear Ms. Monroe:

Pierce Atwood LLP represents Antrim Wind Energy, LLC ("Antrim Wind") and Antrim Level, LLC ("Antrim Level"). Antrim Wind is the holder of the Certificate of Site and Facility ("Certificate") with regard to the construction and operation of a 28.8 MW wind energy project in Antrim, NH. You will recall that by decision dated February 15, 2019, the Site Evaluation Committee ("Committee") authorized the transfer of the ownership interests in Antrim Wind from Walden Green Energy Northeast Wind, LLC and Walden Antrim, LLC to Antrim Level. (SEC Docket No. 2018-03). The transfer of ownership interests in Antrim Wind was completed on March 28, 2019. As the construction of the wind facility nears completion and Antrim Wind prepares for commencement of operations, I am writing with regard to the staffing of the facility once it is operational.

In the Joint Petition of Walden Green Energy Northeast Wind, LLC, Walden Antrim LLC and Antrim Level LLC for Approval of the Transfer of Membership Interests in Antrim Wind Energy, LLC ("Joint Petition"), and during the adjudicative hearing on the Joint Petition, Antrim Level described how it intends to staff the wind facility. Specifically, it was stated that under the terms of the existing Service and Maintenance Agreement ("SMA") between Siemens and Antrim Wind, Siemens will provide two full-time employees on site. In addition, Antrim Level (TransAlta) will have one full-time employee on site throughout the term of Antrim Wind's operations. Furthermore, it was described that upon expiration of the SMA, Antrim Level will make the determination as to whether to extend the Siemens SMA, insource turbine maintenance to its own staff, or enter in to a new contract with another experienced and qualified third party for turbine service and maintenance. In accordance with the terms and conditions of the Certificate, Antrim Wind is required to notify the Administrator, in writing, of any modification or replacement of the Operations and Maintenance Agreement within 60 days of such modification or replacement.

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In Antrim Wind Energy, LLC SEC Docket No.2015-02, the applicant indicated that it would seek to hire two full-time staff to work on-site along with the technicians from Siemens.

During the adjudicative hearing on the Joint Petition and after the issuance of the February 15, 2019 Decision and Order Approving the Transfer of Ownership Interests in Antrim Wind, the Town of Antrim sought clarification from Antrim Level with regard to how it planned to staff the operation of the facility. In response, Gary Woods, Managing Director of Gas and Renewable Operations at TransAlta Corporation, sent a letter to the Town of Antrim dated March 14, 2019 describing in detail how the company plans to staff Antrim Wind. A copy of that letter is enclosed for your information. As set forth in Mr. Woods' letter, TransAlta believes that its staffing plan for the Antrim Wind facility represents a significant upgrade when compared to the plan proposed by the original proponent. TransAlta's staffing model is based on a combination of onsite field personnel, centralized control room monitoring by the Wind Control Center, direct support from other field locations and shared service support from TransAlta's main office.

By letter dated March 18, 2019, Attorney Justin Richardson responded to the letter from Mr. Woods (copy enclosed). Attorney Richardson notes, among other things, that based on the explanation provided in the March 14, 2019 letter from Mr. Woods, TransAlta's plan appears to meet or exceed the two-employee minimum that had been proposed by the original proponent. We believe that TransAlta's staffing plan, as set forth in its March 14, 2019 letter to the Town of Antrim, is consistent with the Joint Petition and testimony offered at the adjudicative hearing and is consistent with the terms of the Certificate.

As noted above, the Certificate provides that "the Applicant shall notify the Administrator of the Committee, in writing, of any modifications or replacement of the Operation and Maintenance Agreement within sixty days of such modification or replacement." Accordingly, while we believe that TransAlta's staffing plan is consistent with the terms of the Certificate, to the extent that the original project proponent's plan to hire two full-time employees to work on-site could be considered a condition of the Certificate, please accept this letter as notice that Antrim Level plans to staff the operation of the wind facility in the manner described in the March 14, 2019 letter from Mr. Woods to the Town of Antrim.

Please contact me should you have any questions with regard to this matter. Thank you.

Very truly yours,



Mark E. Beliveau

MEB/adm
Encl.



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Managing Director, Gas and Renewable Operations
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March 14, 2019

Via Electronic Mail Only

Town of Antrim
Select Board
c/o Justin C. Richardson, Esq.
Upton & Hatfield, LLP
159 Middle Street
Portsmouth, NH 03801

Dear Board Members:

Re: Antrim Wind Energy Facility

We understand that the Board has a question on how we will be staffing the operation of the Antrim Wind Facility as compared to what was described in SEC Docket No. 2015-02. We are happy to provide additional detail on how we plan to staff Antrim Wind and would welcome the opportunity to meet with you in Antrim at your convenience if that would be helpful. Also, we would like to invite one of the members of the Select Board, at their convenience, and, at TransAlta's expense, to visit an operating TransAlta wind facility in Southern Alberta and to tour both the Wind Control Center (WCC) and our head office to witness our capabilities first hand.

As discussed at length at the hearing, and in our written testimony, TransAlta is an extremely experienced owner and operator of wind generation facilities, with over 1300MW of wind generation operating across North America. Moreover, as shown at the hearing, of upmost importance to TransAlta is safety and, we believe that our safety policies and procedures bear that out. We are very proud of our safety performance at our wind facilities which ranks among industry leaders.

Rather than diminishing the staffing described in SEC Docket No. 2015-02, TransAlta's staffing plan for the Antrim Wind Facility represents a significant upgrade versus that which was proposed by the original proponent. In contrast to TransAlta, the original proponent had no experience operating wind facilities and lacked the critical expertise and infrastructure supporting TransAlta's entire wind fleet, all of which will be applied to the Antrim Facility. TransAlta's staffing model is a combination of onsite field personnel, centralized control room monitoring, direct support from other field locations, and shared service support from our head office.

With respect to on site staffing, TransAlta's standard approach is 10 towers per technician (minimum of two). And, because we have established service arrangements with contractors such as Siemens at several of our other sites, we have not needed to prescribe if the technicians are staffed directly by TransAlta or the contractors, as we have, and impose, the same expectations for operation of each of our facilities. As outlined in TransAlta's testimony, TransAlta's initial staffing plan for Antrim is as follows:

- Two technicians, employed by Siemens, who will be responsible for turbine maintenance. These employees will be onsite employees;
- One TransAlta Lead Technician – This employee will be responsible for maintaining the balance of plant and coordinating with the Siemens technicians. This employee will be onsite, on call 24x7, and will report to the TransAlta Northeast US Supervisor;
- One TransAlta Northeast US Supervisor – This employee will oversee operations at TransAlta's Big Level (90 MW) facility in Pennsylvania, as well as the 29 MW Antrim facility. This employee will be headquartered at the Big Level facility but will have overall accountability for Antrim as well, and will be on site at Antrim on a regular basis;
- The Antrim Wind Energy Facility will also be monitored 24x7 from TransAlta's Wind Control Center (WCC) in Pincher Creek, Alberta. The WCC has six full time employees responsible for monitoring and managing TransAlta's wind fleet. The WCC has a 24-hour toll free number that can be called in case of emergency in addition to the TransAlta Lead Technician on site. The WCC can shut down and restart turbines if required and can also dispatch local emergency personnel;
- In addition to these dedicated staff, Antrim Wind Energy will also be overseen and supported by:
 - **Anik Whittom**, TransAlta's Manager, Wind Operations. Anik leads all the operations functions of TransAlta's wind business in North America including Environmental Health & Safety, operations, maintenance, and engineering. Anik is located in Matane, Quebec, but will be required to visit Antrim frequently;
 - **Robert Fyke**, Wind Operations Safety Advisor. Robert provides safety expertise and support. He is located at a TransAlta wind site in Ontario, Canada, but frequently travels to the field, which will include Antrim;
 - **Samantha Hoffman**, Electrical Engineer. Samantha is accountable for the function of electrical engineering at all our wind sites in North America. She is located at our wind facilities in Alberta, Canada, and is required to frequently travel to sites which will include Antrim;
 - **Ethan Mollasalehi**, Mechanical Engineer. Ethan is accountable for the function of mechanical engineering at all our wind sites in North America. He is located at a wind site in Ontario, Canada, and is required to frequently travel to other field locations which will include Antrim; and

- **Charles Doubrough**, Controls Engineer. Charles is accountable for maintaining both our field and control center control systems in North America. He is located at a wind facility in Ontario, Canada but is required to travel frequently to field locations which will include Antrim.

Furthermore, as discussed at length during the hearing, TransAlta's operating and safety standards, protocols and programs will all be implemented at the Antrim Wind Facility ensuring safe and reliable operation of the facility. In addition to the employees listed above, Antrim will be supported by our corporate environmental Health and Safety, Technical and Diagnostic Services, Supply Chain Management and Electrical System Reliability departments.

We believe that our plan on how we will staff Antrim Wind more than assures that we will operate Antrim Wind in continuing compliance with the terms and conditions of the Certificate.

We hope that the foregoing addresses the Board's question. TransAlta is excited to continue working with the Board in years to come. To support its ongoing relationship with the Town, as mentioned above, TransAlta would like to invite one of the members of the Select Board, at their convenience (and at our expense), to visit an operating TransAlta wind facility in Southern Alberta and to tour both the WCC and our head office in order to permit us to demonstrate both TransAlta's operating capabilities and safety protocols, as well as the capabilities of the WCC and corporate team which will support and enhance the operations of the Antrim Wind Facility.

If you have any questions, please feel free to contact me.

Yours truly,

TRANSALTA CORPORATION



GARY WOODS
Managing Director
Gas and Renewable Operations

Russell F. Hilliard
James F. Raymond
Barton L. Mayer
Heather M. Burns
Lauren Simon Irwin
Justin C. Richardson
Michael S. McGrath*
Jeanne S. Saffan**
Peter W. Leberman
Sabrina C. Beavens***
Susan Aileen Lowry
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Serving New Hampshire since 1908

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* Also admitted in MA
** Also admitted in MA & NY
*** Also admitted in MA & FL
**** Also admitted in MN

March 18, 2019

Via Electronic Mail

Mark Beliveau, Esq.
Pierce Atwood, LLP
1 New Hampshire Ave Ste 350
Portsmouth, NH 03801

Re: Joint Petition of TransAlta to Acquire Antrim Wind Energy, LLC
NHSEC Docket No. 2018-03

Dear Mark:

Thank you for providing TransAlta's March 14, 2019 letter outlining its staffing plan for the Antrim Wind Energy, LLC ("Antrim Wind") project. As I indicated, the February 15, 2019 decision by the Site Evaluation Committee ("SEC") stated on Page 6 that "TransAlta will have one full-time employee on site throughout the term of AWE's operations." This appeared to be an error because the March 17, 2017 decision issuing the certificate stated that Antrim Wind "will hire two full-time employees who, along with 2-3 Siemens' technicians, will work on-site and ensure operation of the Project in compliance with the Certificate. App.35, at 18-19; App. 2, at 6." Pages 67; 81 – 82.

Based on Mr. Woods' explanation, TransAlta's plan appears to meet or exceed the 2 employee minimum. As a result, there is no reason to seek clarification of the February 15, 2019 SEC decision. However, I caution that the Town does not have the authority modify or waive the requirements of the SEC. In addition, because of the importance of public safety and emergency response, the Town reserves the right to request that two on-site employees be maintained if necessary for public safety or other reasons.

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I understand that the Board may put this matter on its next or future agenda and the Town may reach out to Mr. Woods thereafter. If you have any questions, please feel free to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read "Justin C. Richardson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Justin C. Richardson
jrichardson@uptonhatfield.com
(603) 436-7046

JCR
cc: Donna Hanson, Town Administrator