

**STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE**

RE: Application of Granite Reliable Power, LLC for Certificate)
of site and facility to construct up to 99 MW of wind electric)
generation in Coos County, New Hampshire and operate the same.)

**MOTION FOR RECONSIDERATION OF DEADLINE
TO SUBMIT DATA REQUESTS**

Industrial Wind Action Group (“IWA”), responding to the revised procedural as approved by Thomas B. Getz, presiding officer of the Site Evaluation Committee (“Committee”) on October 14, 2008, hereby respectfully moves the Committee for reconsideration of the deadline of October 20, 2008 approved for Ms. Linowes, Ms. Keene, and other parties wishing “to take advantage of the revised date for propounding data requests”. In support of this motion, it is stated as follows:

1. On October 14, Chairman Getz signed the order granting petitions to intervene and revising the procedural schedule pertaining to Docket #2008-04. The order granted Ms. Linowes, Ms. Keene, and other parties not including Counsel to the Public, the opportunity to submit data requests to the Applicant by October 20. Counsel to the Public deadline was unchanged at November 3.

2. The October 14 order was not received by the parties until October 20, the same day as the revised deadline for data requests to be submitted by the parties other than Counsel to the Public.

In order to allow for the development of an evidentiary record in this case and to provide a fair opportunity to develop information pertaining to this case, IWA respectfully asks the Committee for the following consideration:

- A. Deadline for data requests to be extended to November 3, 2008 with responses due by November 17, 2008, identical to the deadlines afforded Public Counsel.

B. Allow for the November 3 deadline to apply to other parties who wish to take advantage of the revised date for propounding data requests.

C. Grant such further relief as it deems equitable and appropriate.

Dated this day of October 21, 2008

INDUSTRIAL WIND ACTION GROUP

By:

Lisa Linowes

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IWA has contacted all of the parties regarding this motion. Their responses are listed below:

Support: Counsel to the Public Peter Roth, Granite Reliable Power, LLC, Kathlyn J. Keene, Robert A. Keene, Jon Odell

Neutral: AMC, Clean Power Development, LLC, Wayne R. Urso

No Response: Sonja M. Sheldon, NH Wind Energy Association

cc: Parties to Docket 2008-04