

**ATTORNEY GENERAL  
DEPARTMENT OF JUSTICE**

33 CAPITOL STREET  
CONCORD, NEW HAMPSHIRE 03301-6397

JOSEPH A. FOSTER  
ATTORNEY GENERAL



ANN M. RICE  
DEPUTY ATTORNEY GENERAL

October 14, 2013

Via Electronic Mail and Messenger Mail

Jane Murray, Secretary  
New Hampshire Site Evaluation Committee  
29 Hazen Drive  
Concord, New Hampshire 03301

Re: Application of Groton Wind, LLC  
Docket No. 2010-01

Dear Ms. Murray:

Enclosed please find the State's Partially Assented-To Motion to Continue Deadline for Providing Specified Information to the Committee for filing in the above-referenced matter.

Thank you for your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "M.C. Evans".

Mary C. Evans  
Legal Assistant  
Transportation & Construction Bureau  
(603) 271-3675

mce  
Enclosure  
cc: Service List (via electronic mail)  
958192

STATE OF NEW HAMPSHIRE  
SITE EVALUATION COMMITTEE

Docket No. 2010-01

Application of Groton Wind, LLC for a Certificate of Site and Facility

**PARTIALLY ASSENTED-TO MOTION TO CONTINUE DEADLINE FOR  
PROVIDING SPECIFIED INFORMATION TO THE COMMITTEE**

NOW COMES the State of New Hampshire, Department of Safety (“the Department”), by and through its attorneys, the Office of the Attorney General, and respectfully moves that the New Hampshire Site Evaluation Committee (“the Committee”) continue the deadline for providing specified information to the Committee in the above-captioned matter. In support of this Motion, the Department says as follows:

1. This Motion seeks a continuance of the deadline for providing specified information to the Committee due to undersigned just learning that Investigator Ron Anstey is out of the office this week for a personal family emergency.
2. A prehearing conference was held on this matter on October 2, 2013. Prior to that conference, an agenda for the prehearing conference was issued and which required Investigator Anstey to file copies of all correspondence of any nature between the Applicant, Applicant’s representative or agents pertaining to the fire code, life safety code, or building code and whether “on-board” fire suppression equipment is required. *See* Agenda for Prehearing Conference on October 2, 2013 at 3, ¶ D(2). In addition, the agenda also required Investigator Anstey to file a copy of “all relevant and applicable building, life safety and fire codes supporting the claim set forth in his correspondence dated August 12, 2013.” *See* Agenda for Prehearing Conference on October 2, 2013 at 3, ¶ D(3).

3. Lastly, at the prehearing conference, based on undersigned counsel's notes, Investigator Anstey was to provide the codes he believes were applicable so that the Site Evaluation Committee had them.

4. The deadline for all of these above submissions was within 10 days of the prehearing conference, which is tomorrow, assuming Columbus Day is considered a legal holiday. If not, the deadline is today.

5. Undersigned counsel was just informed today that Investigator Anstey is out of the office this week due to a family emergency. Accordingly, a brief extension until October 21, 2013 is requested so that the remaining information may be compiled in Investigator Anstey's absence.

6. A good faith effort was made to obtain concurrence with the relief sought in this Motion from all the parties. As of the time this Motion was finalized, the following parties have indicated their positions: Counsel for the Public, Senior Assistant Attorney General Peter Roth concurs with the requested relief; and no other party responded.

WHEREFORE, the Department respectfully requests that the Committee:

- A. Continue the deadline for providing specified information to the Committee to October 21, 2013; and
- B. Grant such further relief as it deems appropriate.

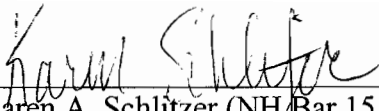
Respectfully submitted,

THE STATE OF NEW HAMPSHIRE  
DEPARTMENT OF SAFETY

By its attorneys,

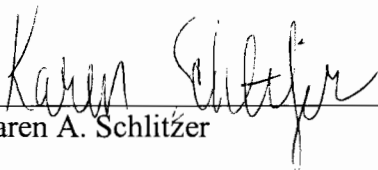
JOSEPH A. FOSTER  
ATTORNEY GENERAL

October 14, 2013

  
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Karen A. Schlitzer (NH/Bar 15169)  
Senior Assistant Attorney General  
Transportation & Construction Bureau  
33 Capitol Street  
Concord, New Hampshire 03301-6397  
(603) 271-3675

**Certificate of Service**

I certify that a copy of the foregoing has on this 14<sup>th</sup> day of October, 2013, been electronically mailed to the parties on the service list.

  
\_\_\_\_\_  
Karen A. Schlitzer

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