

**STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE**

_____)
In re Proceeding to Suspend)
the Certificate of Site and Facility)
of Groton Wind, LLC.)
_____)

No. 2010-01

**OBJECTION OF COUNSEL FOR THE PUBLIC
TO MOTION FOR APPROVAL OF
AMENDMENT TO TOWN OF GROTON AGREEMENT**

Counsel for the Public, by his attorneys, the Office of the Attorney General, hereby objects to the Contested Motion for Approval of Amendment to Town of Groton Agreement. Counsel for the Public objects because the motion seeks relief that is part of an ongoing proceeding over whether Groton Wind has an adequate fire and life safety plan. So far no such plan appears to have been completed despite the passage of over a year since the issue first came up. In addition, there remains unresolved the question of whether the Movant's certificate ought to be suspended. There seems little purpose to amending a certificate that may be revoked or approving a partial measure in the face of a larger and more comprehensive problem with the fire and life safety plan. This motion should be tabled until at a minimum the fire and life safety plan has been finalized and approved, after hearing, by the Committee, and the question of the certificate suspension has been resolved. Then, a full adjudicative proceeding should be held to determine the merits of the motion.

Wherefore, Counsel for the Public prays that the Committee deny the motion or stay it, and grant such other and further relief as may be just.

Respectfully submitted,

COUNSEL FOR THE PUBLIC

ANN M. RICE
DEPUTY ATTORNEY GENERAL



Dated: April 21, 2014

Peter C.L. Roth
Senior Assistant Attorney General
33 Capitol Street
Concord, New Hampshire 03301

CERTIFICATE OF SERVICE

I, Peter C.L. Roth, do hereby certify that I served the foregoing upon the parties by email.

April 21, 2014

/s/ Peter C.L. Roth
Peter C.L. Roth