



Industrial Wind Action Group

facts, analysis, exposure of wind energy's real impacts

December 31, 2010

Michael J. Iacopino, Presiding Officer
c/o Thomas S. Burack, Chairman
New Hampshire Site Evaluation Committee
N.H. Department of Environmental Services
29 Hazen Drive
Concord, New Hampshire 03302-0095

Re: Docket No. 2010-03 Joint Application by Granite Reliable Power, LLC and Brookfield Renewable Power Inc.

Dear Attorney Iacopino:

Industrial Wind Action Group respectfully submits the attached motion to intervene pertaining to the above referenced matter.

If you have any questions, please contact me by phone at 603-838-6588 or by e-mail at llinowes@windaction.org.

Sincerely,

Lisa Linowes
for the Industrial Wind Action Group

**STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE**

RE: Docket 2010-03 Joint Application By Granite Reliable Power, LLC And Brookfield Renewable Power Inc. For Approval To Transfer Equity Interests In Granite Reliable Power, LLC Under RSA Ch. 162-H

MOTION TO INTERVENE *PRO SE* OF INDUSTRIAL WIND ACTION GROUP

Pursuant to the New Hampshire Site Evaluation Committee ("Committee") Rules Site 202.11, Industrial Wind Action Group ("IWA") hereby moves for permission to intervene *pro se* in the above-referenced proceeding.

In support of its Motion to Intervene, IWA offers the following arguments:

(1.) IWA can demonstrate a substantial interest which may be affected by the outcome of the proceeding.

The Committee granted IWA full intervenor status on Docket 2008-04 pertaining to the Granite Reliable Power LLC proposal to construct a wind electric generation facility and associated transmission and interconnection facilities in Coos County, New Hampshire. IWA's substantial interest in issues pertaining to this matter have not changed since the Committee approved the project¹. Further, economic conditions involving wind energy development within the United States and New England, in particular, have changed markedly since Docket 2008-04 was completed. Given the current economic conditions it is prudent to examine the financial, managerial and technical abilities of Brookfield Renewable Power Inc.

(2.) There are no alternative means by which the interest of IWA can be protected.

IWA represents individuals and groups whose interests span both the immediate and regional resources impacted by the project. IWA does not anticipate that any party to this proceeding can represent the interests of IWA's subscribers. Further, there are no alternative proceedings in which IWA's substantial interest in the outcome of this matter can be protected. It is appropriate, therefore, for IWA to

¹ Attached is IWA's original letter requesting intervenor status.

participate in this proceeding in order to provide information on whether this project will serve the interests of our subscribers.

(3.) The intervention of IWA will be in the interest of justice and will not impair the orderly and prompt conduct of the proceedings by allowing the intervention.

Pursuant to the SEC Order of December 17, 2010, IWA files this Motion to Intervene by the deadline set forth by the Committee for Docket 2010-03 and requests that it be permitted to intervene with full standing to participate in all phases and activities of the proceeding. As noted, IWA participated in the original Docket 2008-04. IWA has experience in this matter and other similar proceedings in New Hampshire and Vermont. We respect the importance of conducting this proceeding in an orderly manner that will not unduly delay the Committee or the parties in reaching an outcome. IWA is prepared to work closely with other parties in the interest of maintaining order and respectfully offers that the Group's participation, if permitted, would be in the interest of justice.

Dated this 31th day of December, 2010.

Respectfully submitted,



Lisa Linowes
for Industrial Wind Action Group
286 Parker Hill Road
Lyman, NH 03585
(603) 838-6588

cc: Parties to Docket 2010-03

**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 TO INTERVENE *PRO SE* OF INDUSTRIAL WIND ACTION GROUP

Pursuant to the New Hampshire Site Evaluation Committee Rules Site 202.11, Industrial Wind Action Group (“IWA”) hereby moves for permission to intervene *pro se* in the above-referenced proceeding.

In support of its Motion to Intervene, IWA offers the following arguments:

(1.) IWA can demonstrate a substantial interest which may be affected by the outcome of the proceeding.

IWA is a national organization comprised of subscribers who reside throughout the United States, including neighbors to the lands on which the wind electric generation facility and associated transmission and interconnection facilities proposed by Granite Reliable Power, LLC will be constructed. Our subscribers number over 1500 with the majority residing in the eastern U.S. states including New Hampshire and its three bordering states. IWA subscribers have a strong interest in ensuring wind energy proposals are considered in a deliberate and comprehensive manner with a keen focus on the impacts and costs of such development. Up to a third of IWA subscribers reside within the ISO-NE control area and will be directly and substantially affected by the outcome of this proceeding.

IWA has a substantial interest in issues about which findings are required under NH RSA 162-h related to investment in or construction of the wind-turbine facility proposed by Granite Reliable Power. The issues are as follows:

- A. Investment in or construction of the wind electric generation facility and associated transmission and interconnection facilities proposed by Granite Reliable Power, LLC will have an undue adverse effect on:

1. Aesthetics and scenic and natural beauty, including undue adverse impacts to lands and waters, and to the views and enjoyment of those residing in the State of New Hampshire and to visitors to the State.
 2. The natural environment including but not limited to migratory or resident animal, bat and bird populations; plant communities; forest health and fragmentation; interior forest habitat; water, wetland, or watershed resources; state- or federally-listed species.
- B. Investment in or construction of the wind electric generation facility will not meet the need for present and future demand for adequate and reliable electric power.

(2.) The interest of IWA will not be adequately protected by other parties.

In exercising its discretion, we respectfully ask that the Committee consider whether the party's interest will be adequately protected by other parties. IWA has not taken a position in favor of or opposed to wind energy development per se, however, the organization has raised concern as to whether the benefits of these projects justify the costs, both in money, reliability of our electric system, and impacts to the land and surrounding properties. Given this stance, we do not believe that any other party to this proceeding can represent the interests of IWA subscribers. We are compelled to note that the majority of motions to intervene received by the Committee were from individuals or entities that either a) have a financial interest in the outcome of these proceedings or b) reflect parties with local interests.

(3.) There are no alternative means by which the interest of IWA can be protected.

IWA represents individuals and groups whose interests span both the immediate and regional resources impacted by the project. IWA does not anticipate that any party to this proceeding can represent the interests of IWA's subscribers. Further, there are no alternative proceedings in which IWA's substantial interest in the outcome of this matter can be protected. It is appropriate, therefore, for IWA to participate in this proceeding in order to provide information on whether this project will serve the interests of our subscribers.

(4.) The intervention of IWA will be in the interest of justice and will not impair the orderly and prompt conduct of the proceedings by allowing the intervention.

Pursuant to the SEC Order of August 27, 2008, IWA files this Motion to Intervene by the deadline set forth by the Committee for Docket 2008-04 and requests that it be permitted to intervene with full standing to participate in all phases and activities of the proceeding. IWA has experience in these matters and has participated in similar proceedings in New Hampshire and Vermont. We respect the importance of conducting this proceeding in an orderly manner that will not unduly delay the Committee or the parties in reaching an outcome. IWA is prepared to work closely with other parties to the proceeding in the interest of maintaining order and respectfully offers that the Group's participation, if permitted, would be in the interest of justice.

Dated this 17th day of September, 2008.

Respectfully submitted,

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cc: Parties to Docket 2008-04