

**STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE**

RE: Petition by Antrim Wind Energy, LLC)
for jurisdiction over renewable energy facility)
SEC Docket Number 2011-02)

MOTION TO RECONFIGURE INTERVENOR GROUPS

Pursuant to the New Hampshire Site Evaluation Committee Rules Site 202.11, Richard Block and Lorraine Carey Block hereby move to reconfigure the grouping arrangement of intervenors in the above-referenced proceeding.

Of the 19 motions to intervene received by the Committee, 10 are from parties whose interests and concerns are extremely similar. This group includes: Richard Block and Lorraine Carey Block, Spencer Garrett, Mark and Brenda Schaefer, Janice D. Longgood, Annie Law, Robert Cleland, Samuel and Michelle Apkarian, Keith and Julie Klinger, Elsa Voelcker, and James Hankard.

The above named intervenors all reside in the North Branch region of Antrim and own property in the immediate vicinity of the proposed wind turbine facility. In the appeal procedures conducted by the Antrim Planning Board and Zoning Board of Adjustment over the last two years regarding Antrim Wind Energy LLC's applications, most of this group served as appellants. They have been working together over the past two years and, for the sake of efficiency in the presentation of witnesses, argument, cross-examination, and other participation in this proceeding, due process would best be served if these 10 intervenors were permitted to intervene as one group.

Likewise, the remaining four citizen intervenors, Robert L. Edwards, Brian Beihl, Barbara Gard, and Mary Allen, have claims similar to each other and it would be appropriate for them to serve as a group.

We have discussed this motion with the parties on the SEC Service List and have to date received assent from: Audubon Society, Harris Center, Town of Antrim Planning Board, Gordon Webber, Annie Law, James Hankard, Janice D Longgood, Keith and Julie Klinger, Mark J and Brenda Schaefer, Robert A Cleland, Samuel E and Michelle D Apkarian, Spencer Garrett, Elsa Voelcker, Mary Allen, Barbara Gard, and Brian Beihl. We have not been able to contact Robert L. Edwards.

In response to a request from Attorney Rachel Aslin Goldwasser, we sent a draft of this document to Attorney Goldwasser as well as to Attorney Susan Geiger (Counsel for the

Applicant) and to Attorney Justin Richardson (Counsel for the Town of Antrim.) In response, Attorney Richardson wrote that the Town of Antrim takes no position on the motion. We have not received a response from either Attorney Goldwasser nor from Attorney Geiger.

We thank you for your consideration of this request.

Dated this 24th day of May, 2011.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Richard Block', with a large, stylized initial 'R'.

Richard Block
63 Loveren Mill Road
Antrim, New Hampshire 03440
603-588-2552

A handwritten signature in black ink, appearing to read 'Lorraine Carey Block', written in a cursive style.

Lorraine Carey Block
63 Loveren Mill Road
Antrim, New Hampshire 03440
603-588-2552