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July 2, 2012

Ms. Jane Murray, Secretary
New Hampshire Site Evaluation Committee
New Hampshire Department of Environmental Services
P.O. Box 95
29 Hazen Drive
Concord, NH 03302-0095

Re: Docket No. 2012-001 Application of Antrim Wind Energy, LLC for a Certificate of Site
and Facility for a Renewable Energy Facility

Dear Murray:

Enclosed please find for filing in this matter the response of the Audubon Society of New
Hampshire to the Applicant's Response to Motions of Counsel to the Public for Leave to Retain
Consultants.

Very truly yours,

A handwritten signature in blue ink, appearing to read "David Howe", with a long horizontal flourish extending to the right.

David M. Howe

Cc Service List

Enc.

THE STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE

Docket No. 2012 – 01

Re: **Antrim Wind Energy, LLC**

RESPONSE OF THE AUDUBON SOCIETY OF NEW HAMPSHIRE
TO APPLICANT'S RESPONSE TO MOTIONS OF COUNSEL TO THE PUBLIC
FOR LEAVE TO RETAIN CONSULTANTS

NOW COMES the Intervenor, the Audubon Society of New Hampshire ("ASNH"), by its attorney, and respectfully responds to the Applicant's Response to Counsel for the Public's Motions for Leave to Retain Consultants/Expert and in support thereof, ASNH states as follows:

1. Counsel to the Public has filed four motions to retain consultants.
2. ASNH has assented to each of the motions.
3. The Applicant has not objected the hiring of the consultants by counsel to the public, but, with the exception of the proposed cost and scope of work of the proposed avian expert, has objected to the proposed cost and the scope of work of the consultants which include visual, noise and financial experts.
4. ASNH believes that the visual impact of the Applicant's proposed project (the "Project") is a key issue in this proceeding and that the visual impact report of the Applicant's expert does not assess some important visual impacts in the area around the Project and does not adequately assess the visual impacts that it does evaluate.

5. A number of intervenors have requested additional visual impact information, which the Applicant has declined to provide, and a number of those requests are the subject of pending motions to compel.

6. ASNH also believes that the noise impact of the proposed project is an important issue in this case.

8. In its response to written data requests and requests at the technical sessions, the Applicant has declined to provide some additional information or analysis of noise impacts beyond what is in its report.

9. The adequacy of the financial and managerial capabilities of the Applicant to assure the construction and operation of the Project is central to the findings that the Committee must adopt if it approves the Project.

10. The lack of expertise of the other parties in this case and their limited financial wherewithal, together with the veil of confidentiality imposed on financial matters of the Applicant, makes it difficult for the Intervenor to probe these financial issues as well as the technical aspects of the visual, noise and avian issues.

11. Counsel to the Public with the assistance of his proposed experts is therefore uniquely positioned to probe these and therefore protect the public interest.

12. The retention of the proposed experts will not result in “duplicative” work as asserted by the Applicant.

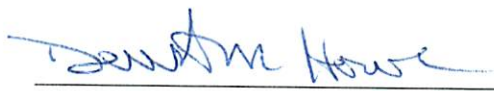
13. The proposed cost and scope of work of the experts requested by Counsel to the Public are reasonable.

WHEREFORE, ASNH respectfully requests that the SEC issue an order granting the motions of Counsel to the Public for leave to hire consultants and granting such other and further relief as justice requires.

Respectfully submitted,

AUDUBON SOCIETY OF NEW HAMPSHIRE

By Its Attorney,



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Certificate of Service

I hereby certify that, on this 2nd day of July, 2012 I have sent the foregoing Response via electronic mail to the persons named on the Service List of this Docket.



David M. Howe