

April 17, 2013

New Hampshire Site Evaluation Committee
Attn: Ms. Jane Murray, Secretary
29 Hazen Drive
Concord, NH 03302

Re: SEC Docket 2012-1 – Application of Antrim Wind Energy LLC for a Certificate of Site and Facility

Dear Chairman Ignatius and Members of the Committee:

We, the undersigned companies, organizations and citizens of New Hampshire, are concerned about the New Hampshire Site Evaluation Committee's ("SEC") recent denial of a Certificate of Site and Facility for the Antrim Wind Energy (AWE) project in Antrim, NH.

As residents committed to having New Hampshire assume a leadership role in developing clean, renewable sources of energy production, it is imperative that projects such as this are given due consideration that is consistent with prior precedents and current industry practice.

We care deeply about our natural environment and the anticipated effects of climate change on our economy, our communities and the natural capital that is unique to our state. We support clean, renewable energy due to the many benefits it can bring our state and our region by improving air and water quality, reducing CO2 emissions and reducing the amount of damage done by the extraction, processing and transport and combustion of the fossil fuels that currently power our economy. We also support the economic development benefits that these projects can bring to our state as well as the long-term, stably priced power that will benefit us all.

We view the recent decision by the Site Evaluation Committee to deny the Antrim Wind Energy project a certificate based on relatively short-term (and subjective) visual impacts to be flawed and myopic. It departs from earlier precedents set by this committee related to the aesthetic impacts from wind energy projects, discourages much needed investment in this area and seriously frustrates clear state policies designed to encourage renewable energy.

All energy projects carry a degree of undesired impacts, and we understand the charge of this committee to evaluate whether those impacts exceed acceptable limits. What is deemed palatable or reasonable, however, needs to be viewed in the context of our current energy and climate challenges, which pose the greatest risk to our long-term security and the integrity of our ecosystems.

After 11 days of evidentiary hearings and three days of deliberations, we understand this Committee found that the project would not have unreasonable adverse impacts on the natural environment, air and water quality or public health and safety. We also understand that the Applicant has committed to embrace the measures listed below as a means of minimizing impacts to the surrounding landscape. .

- AWE has entered binding agreements to permanently conserve large tracts of forested land
- AWE has committed to use innovative technology to eliminate night time lighting on turbines
- AWE has reached agreements with the Town of Antrim, the Appalachian Mountain Club and the Harris Center for Conservation Education

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In light of these factors, we strongly encourage the Committee to reconsider its decision and carefully evaluate all of the relevant facts and evidence to ensure that the Antrim Project is held to the same standards as previous wind projects before the Committee. Otherwise, the Committee risks setting a new, disturbing precedent that we believe will seriously jeopardize future investment in renewable energy development in New Hampshire.

Thank you for your attention to our request; we appreciate your consideration of our views.

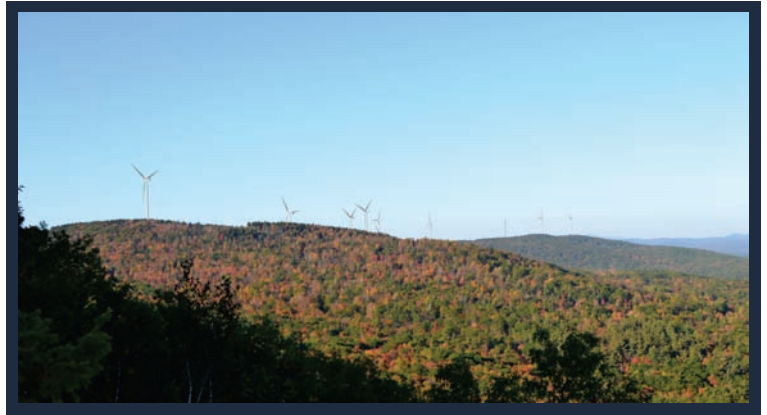
Respectfully Signed,

Mike Bellamente, Director, Climate Counts

Project Overview

Environmental Benefits

- Energy & Emissions
 - Emissions-free electricity to supply enough power to serve 13,500 average NH homes annually
 - Annual CO2 emissions reduced by almost 60,000 tons; over 150 tons of other harmful pollutants (Resource Systems Group (RSG) study) reduced annually – that is **2.4 billion pounds** in avoided CO2 in 20 yrs
 - Displacement of fossil fuel based electricity provides fresh water savings of more than **17,500,000 gallons** each year (RSG)
- Conservation
 - AWE's voluntary efforts led to agreements whereby the Project would **permanently conserve over 800 acres** of valuable forestland, while directly impacting only 60 acres for an 11 acre facility – an unprecedented voluntary conservation benefit
- Avian and Bat Protection Plan
 - AWE's innovative adaptive management plan for avian and bat plan put forth by an applicant and received the support of USFWS and NHF&G. It includes a proven strategy for reducing mortality of bats using seasonal curtailment (a first in NH)
- Agreement with AMC
 - AWE commits to use innovative radar activated nighttime lighting to virtually eliminate light intrusion from the project (a first in NH), satisfying Appalachian Mountain Club' concerns about Project's visual impacts



Proposed AWE Project viewed from Bald Mtn

Economic Benefits

- \$55M in economic development impact to the region (University of New Hampshire study)
- 86 FTE jobs during construction and 13 FTE jobs during operations
- Over \$8.9M paid to the Town of Antrim via PILOT agreement –more per MW than any other project in NH with a PILOT agreement
- \$3.8M spent to date on permitting and development activities (at-risk money based on Project's outstanding attributes relative precedent NH wind projects)
- Millions of dollars in utility property tax to benefit New Hampshire schools
- UNH and National studies show no adverse impact to property values

Town Support

- Antrim voters have consistently supported the Project in straw polls, surveys and the overwhelming defeat of an anti-wind ordinance
- Town of Antrim entered into an Agreement with AWE that specifically allows for 10 turbines up to 500 feet tall, after public discussion on the Project
- Antrim zoning, as upheld by NH Superior Court, specified that the Project is an allowed use in the zoning district and is exempt from height restrictions

Favorable Siting Attributes Compared to Precedent NH Wind Projects

- Close to point of interconnection with grid = **no new transmission** is needed for the Project, which avoids all impacts associated with new overhead lines.
- Far fewer road miles per MW of installed capacity than other wind projects
- Only project to use radar activated lights

Visual Impact

- The SEC decision was based primarily on impacts to Willard Pond, which is part of conservation land privately owned by NH Audubon
- SEC decision, in part, found that Willard Pond and its surroundings (a natural environment similar to the vast majority of land in NH) cannot coexist with a wind project
- Other projects have been located in areas with more pristine wilderness settings, closer to undeveloped lakes and ponds (including Lempster Wind, which is adjacent to Pillsbury State Park with three undeveloped ponds within 3 miles of turbines)

If the decision is upheld, it sets detrimental precedent for future wind development and clean energy investment in the State and region.

SEC Decision

- SEC found that the Project will not have an unreasonable adverse impact on the natural environment, public health and safety, the orderly development of the region, or air and water quality
- The Project was denied due to an SEC finding that the project would cause an unreasonable adverse impact on aesthetics
- Creates a troubling precedent that past decisions do not matter, that renewable energy and conservation are fundamentally incompatible, and that aesthetic concerns of one abutter (NH Audubon) can block a renewable energy project that would, if built, positively contribute to the region's economic development, air quality and renewable energy portfolio
- 11 days of adjudicative hearings (Oct-Dec 2012) and 3 days of Committee deliberations (February 5-7 2013) and no order of decision issued yet

NH Audubon's Willard Pond

- Willard Pond is an artificial impoundment, not a natural lake
- It is accessed by road, with a parking area and boat launch that allows electric motorized boats
- Nothing in the Antrim Master Plan, Open Space Plan or any other State document identifies Willard Pond as a protected scenic resource



Proposed AWE Project viewed from Willard Pond