

**STATE OF NEW HAMPSHIRE  
SITE EVALUATION COMMITTEE**

Concerning an Application for a Certificate of Site and Facility  
Antrim Wind Energy LLC  
Docket No. 2012-01

**OBJECTION OF THREE INTERVENOR GROUPS**

North Branch Resident Intervenors  
Abutters' Group Intervenors  
Edwards-Allen Joint Intervenors

**To The**

**APPLICANT'S UNASSENTED-TO MOTION TO STRIKE  
GREGG LAKE ASSOCIATION'S LATE-FILED SUBMISSION**

The North Branch Intervenor Group, the Abutters' Intervenor Group, and the Edwards-Allen Intervenor Group, as recognized by the New Hampshire Site Evaluation Committee in SEC Docket 2012-01, jointly submit this objection to the Applicant's Unassented-to Motion to Strike the Gregg Lake Association's Late-filed Submission. The Intervenors joining in this action are all residents and voters in the Town of Antrim and are described as follows:

1. North Branch Resident Intervenors: (Richard and Lorraine Carey Block; Annie Law; Robert A. Cleland; Elsa Voelcker; James Hankard; Samuel E. and Michele D. Apkarian)
2. Abutter's Group Intervenors (Janice Longgood; Mark J., Brenda and Nathan Schaefer; Clark Craig Jr.)
1. Edwards-Allen Joint Intervenors: (Robert L. Edwards and Mary E. Allen)

The Intervenor, so described, argue that the Applicant's Motion to Strike the Gregg Lake Association's ("GLA" or "the Association") Late-filed Submission should be denied for these reasons: (1) The GLA is an approved Intervenor which has been granted the right to state its position to the SEC; and (2) The information in this late-filed submission is significant and could not have been submitted to the SEC earlier.

### **Argument**

Although their participation has been limited by the SEC due to their late entry into this hearing process, the GLA has been granted the right to make their argument to the SEC as to whether or not a Certificate should be approved for the Antrim Wind, LLC application.

Since the GLA, as a group, only meets twice a year, the opportunities for them to determine the group consensus are limited. The most recent meeting was not held until June 15, 2013 at which time a vote was held to determine the GLA's support or non-support of the AWE project. In addition, the families who were not able to participate in that meeting were contacted in order to give all an opportunity to submit their votes.

The result of this vote is significant information which informs the SEC of the GLA's position on the approval of this project, and thus it should be accepted. The letter submitted by the GLA on June 28, 2013, although past the deadline for objections to the Applicant's Motion for Rehearing, is not a formal motion of objection, but rather a letter containing significant information regarding the position of the Association. Thus this letter should not be subject to the deadline restrictions applying to Objections to the Applicant's Motion for Rehearing. The Applicant has likewise submitted numerous late-filed letters of information.

Since the GLA's letter is not a formal Motion or Objection, the Applicants' charges and request that their letter be stricken from the record is groundless.

Additionally, the inclusion of Marie Harriman in the list of concurring parties is improper, since Ms. Harriman is not an Intervenor in this case and in fact has not materially participated in these proceedings. Her name should be stricken from the record.

### **Conclusion**

WHEREFORE, the North Branch, Abutters', and Edwards-Allen Joint Intervenor's Groups respectfully requests that the Committee summarily discard the Applicant's Motion to Strike the Gregg Lake Association's Late-filed Submission.

Respectfully submitted,

Dated: July 9, 2013



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Richard Block  
spokesperson for North Branch Resident Intervenor's



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Janice Longgood  
spokesperson for Abutters' Group Intervenor's



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Robert L. Edwards, Joint Intervenor with Allen



Mary E. Allen, Joint Intervenor with Edwards

**Certificate of Service**

I, Richard Block, certify that on July 9, 2013, I served a copy of the foregoing on the Parties and Intervenors, as identified on the official service list, by electronic mail.



Richard Block