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October 26, 2015

BY E-MAIL

Mr. David K. Wiesner
Staff Attorney
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301

**Subject: New Hampshire Site Evaluation Committee Rulemaking, Rulemaking Notice
2015-12
SEC Docket No. 2014-04**

Mr. Wiesner:

RENEW Northeast, Inc., (“RENEW”)¹ submits this letter concerning the Site Evaluation Committee’s (“SEC”) Final Rules referenced in the above-captioned matter. To the notice dated October 20, 2015, announcing a stakeholder technical session to be held on October 28, 2015, RENEW urges the addition of two agenda items.

1. Sound Standards

A discussion should be held on the rules for wind turbine sound to address why the SEC decided to implement significantly more restrictive measures in the Final Rules than had been placed on now operating projects. The change in regulatory approach with the Final Rules is especially surprising given the lack of noise complaints regarding the three operating New Hampshire wind energy projects. The SEC restrictions on those projects are also consistent with

¹ The comments expressed herein represent the views of RENEW and not necessarily those of any particular member of RENEW.

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regulatory standards in other jurisdictions. RENEW is concerned that how sound is regulated in the Final Rules could effectively prohibit wind facility development in the state.

2. Shadow Flicker Standards

RENEW also requests review of the SEC decision to change the limit on shadow flicker from the 30 hours per year standard, which was the limit in the drafts throughout this rulemaking until the final day of the SEC's deliberations, to 8 hours per year. As with the sound regulations, RENEW is concerned that how shadow flicker is regulated in the Final Rules could effectively prohibit wind facility development in the state.

Thank you for your attention to my request.

Respectfully submitted,



Francis Pullaro
Executive Director

Copy: Rep. Carol M. McGuire, Chair, Joint Legislative Committee on Administrative Rules
Sen. John Reagan, Vice Chair, Joint Legislative Committee on Administrative Rules
Committee Members, Joint Legislative Committee on Administrative Rules
Pamela G. Monroe, Administrator, Site Evaluation Committee
Scott F. Eaton, Administrative Rules Director, Joint Legislative Committee on
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Aaron J. Mitchell, Committee Attorney, Joint Legislative Committee on
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