

**STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE**

RE: Petition of Antrim Wind, LLC for SEC Jurisdiction Over a Renewable)
Facility proposed in the town of Antrim, Hillsborough County, NH)

PETITION TO INTERVENE *PRO SE* OF THE WINDACTION GROUP

Pursuant to the New Hampshire Site Evaluation Committee Rules Site 202.11, The Windaction Group¹ ("Windaction") hereby petitions to intervene *pro se* in the above-referenced proceeding.

In support of its Petition to Intervene, Windaction offers the following arguments:

(1.) Windaction can demonstrate a substantial interest which may be affected by the outcome of the proceeding.

The Site Evaluation Committee ("Committee") previously granted Windaction full intervenor status on Docket No. 2012-01 regarding Antrim Wind, LLC's application to construct a similar renewable energy facility proposed for the same geographic area. Windaction's substantial interests in issues pertaining to this matter have not changed since the Committee considered docket 2012-01.

(2.) The intervention of Windaction will be in the interest of justice and will not impair the orderly and prompt conduct of the proceedings by allowing the intervention.

The Committee has granted Windaction intervention status on at least four separate SEC dockets pursuant to RSA 541-A:32, II². In addition, our representative, Lisa Linowes has provided expert testimony on the Timbertop Wind application (Docket No. 2012-04) and previously represented an intervenor group before the Committee in the Groton Wind enforcement proceeding (Docket No. 2010-01). We respect the importance of conducting this proceeding in an orderly manner that will not unduly

¹ The WindAction Group is also known as the Industrial Wind Action Group.

² Docket No. 2006-01 (Lempster Wind, LLC), No. 2008-04 (Granite Reliable Wind, LLC), No. 2010-03 (Brookfield Renewable Power Inc), and No. 2012-01 (Antrim Wind, LLC). While Windaction believes it meets the criteria under Site 202.11(b)(2) for Intervention, we recognize that the Committee has consistently disagreed. We respect the Committee's position on this matter and limit our arguments herein to RSA 541-A:32, II.

delay the Committee or the parties in reaching an outcome. We believe our representative, Lisa Linowes has the requisite knowledge to contribute to the process in a material way that will benefit the Committee. Ms. Linowes has written and spoken extensively on the topic of wind energy development, land use concerns and the interaction of state and local reviews of project applications. There is no history of Windaction abusing the privilege of intervention. Windaction is prepared to work closely with other parties to the proceeding in the interest of maintaining order and respectfully offers that the Windaction's participation, if permitted, would be in the interest of justice.

(3.) Summary

Pursuant to the Committee's December 30, 2014 Order, Windaction files this Petition to Intervene by the deadline set forth by the Committee for Docket 2014-05 and requests that it be permitted to intervene with full standing to participate in all phases and activities of the proceeding.

At this time, Windaction has not assumed a position in favor, or against, the Committee asserting jurisdiction over the proposed project. However, given that the project appears substantially identical to that which was denied by the Committee under Docket 2012-01, Windaction is concerned that a review process by the Committee may prove duplicative and ultimately result in the same outcome.

Dated this 21st day of January, 2015.

Respectfully submitted,



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for the Windaction Group
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