

NEW HAMPSHIRE SITE EVALUATION COMMITTEE  
OF THE NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION



IN THE MATTER OF THE APPLICATION OF SEA 3, INC.

SEC Docket No. 2015-01

**MOTION TO WITHDRAW INDIVIDUAL APPEARANCE AND JOIN WITH THE  
GREAT BAY STEWARDS**

NOW COMES Laura G. Byergo of 16 Caswell Drive, Greenland, New Hampshire, 02840, in her individual capacity and as an intervening party in the above-captioned proceedings (“Byergo”), and respectfully submits this Motion to Withdraw Individual Appearance (“Motion”) so that she can participate on behalf of the Great Bay Stewards, also an intervening party in the case and for whom she serves as trustee.

**Background**

1. The instant case arises from an application by Sea 3, Inc. (“Sea 3”) for a waiver from the approval and certification provisions of RSA Chapter 162-H, relating to energy facility evaluation, siting, construction and operation.
2. Byergo intervened in the above-referenced matter in her individual capacity.
3. Byergo is also a Board Member with the Great Bay Stewards – who is also an intervening party in the case. The SEC granted intervenor status to the Great Bay Stewards on or about June 3, 2015.
4. In an effort to promote a more streamlined process for all parties, Byergo now seeks to withdraw her individual appearance and join with the Great Bay Stewards, for whom she may hereinafter appear from time to time.
5. The Motion should be allowed because Byergo’s withdrawal, as an individual party in the case, prejudices no person or party. Byergo’s withdrawal will, in fact, serve the

interests of justice by streamlining the litigation proceedings now before the SEC. As such, Byergo respectfully requests that the SEC Order her individual party appearance withdrawn forthwith.

6. Byergo as a Greenland, New Hampshire resident, is directly affected by the dramatic expansion of operations contemplated by Sea-3's projected "improvements," as described at pages 7 through 9 of Sea-3's waiver application. Safety, welfare, health and property value are all impacts that Byergo may suffer; just as they are for the other parties who will remain in the case. Accordingly, while Byergo seeks to withdraw as an intervening party, she remains an impacted citizen and would like to remain on the service list as an interested party and receive copies of all relevant filings by the Applicant and any other person or party.

Respectfully submitted,

**LAURA G. BYERGO**

Date: July 25, 2015

By:  \_\_\_\_\_

**CERTIFICATION**

I hereby certify that on this 27th day of July 2015, I served a copy of the foregoing via U.S. First Class Mail on:

Hon. Martin P. Honigberg, Chairman  
Site Evaluation Committee  
c/o NH Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, NH 03301-2429