MEMORANDUM

APPLICATION OF ANTRIM WIND, LLC Docket No. 2015-02

TO: All Technical Session Participants

FROM: Michael J. Iacopino, Esq.

DATE: April 29, 2016

RE: Technical Session Data Requests

A technical session was held on April 25, 2016 and April 26, 2016 in the above referenced docket. The purpose of this technical session was for the parties to inquire of the Applicant's witnesses regarding expertise, opinions and pre-filed testimony. The following parties were present during all or part of the technical session on each day: Stephen Froling and/or James Newsome for Harris Center for Conservation Education; John Robertson from the Antrim Board of Selectmen; Wes Enman, intervenor; Carol Foss and Frances VonMertens for the Audubon Society of New Hampshire; Lisa Linowes for Windaction Group; Fred Ward, Ph.D., for the meteorologist group; Charles Levesque on behalf of the Levesque/Allen intervenors; Barbara Berwick and Susan Dooley on behalf of the abutting property owners group; Richard Block on behalf of the non-abutting property owners group and Mary Maloney, Counsel for the Public.

At the conclusion of the technical sessions, the following data requests to the Applicant remain outstanding and shall be answered by May 9, 2016:

- 1. The Applicant shall provide a link to the detailed post-construction bird/bat studies referenced by Dana Velleau and Adam Gravel.
- 2. The Applicant shall provide information regarding the privately owned land with conservation easements requiring public access and perpetuity obtained from the GRANIT database by David Raphael and LandWorks.
- 3. The Applicant shall provide the data indicating why Hedgehog Mountain did not emerge as a photo-simulation site (David Raphael).
- 4. Data check: Mr. Raphael will check to see if he has a chart or draft with the numerical ratings that led to his conclusions of low, medium or high effects, if available.
- 5. Mr. Raphael will provide all camera data used in taking the photographs from the Rollins wind facility that are contained within his report.

- 6. Mr. Raphael will provide a list of all of the sites that were field checked for visual impact by him or his staff.
- 7. The Applicant will provide information identifying the widest surface area of the road that is to be constructed and the widest area of clearing required for construction of the road (Butler, Martin).
- 8. The Applicant shall provide information identifying the maximum ledge cut (at the entrance after Route 9) and the maximum fill area. This information should include the station and duration of both the cut and the fill (Butler, Martin).
- 9. The Applicant will check to see if Siemens has an environmental health and safety plan that can be provided (Kenworthy, Marcucci, Cavanaugh, Stovall).
- 10. The Applicant will provide the distance from the Longgood residence to the nearest turbine (Kenworthy, Marcucci, Cavanaugh, Stovall).
- 11. The Applicant will provide a copy of the blasting plan used for the Kingdom Community Wind Farm in Vermont (Kenworthy, Marcucci, Cavanaugh, Stovall).
- 12. The Applicant shall provide information identifying the highest measured wind shear obtained by Mr. O'Neil and Epsilon Associates.
- 13. The Applicant shall provide the location of the actual anemometer placements for the background sound study performed by Mr. O'Neil.
- 14. Lisa Linowes, on behalf of Windaction Group, will provide the full Acciona document from the Canadian wind farm project which she referenced during the course of the technical session.
- 15. The Applicant will provide a copy of the Groton Wind post-construction sound monitoring results obtained by Mr. O'Neil.
- 16. Mr. O'Neil shall provide the wind data for all of the receptor locations utilized during his sound study.
- 17. The Applicant shall advise whether or not property No. 77 in the shadow flicker report is the Dooley-Longgood residence. If not, the Applicant should identify which residence is the Dooley-Longgood residence in the shadow flicker report.
- 18. Mr. O'Neil shall provide photos of the sound monitor locations.
- 19. Mr. O'Neil will provide the raw decibel data that was associated with the wind data referenced above.

The foregoing shall be provided to all of the parties on or before May 9, 2016. Copies shall <u>not</u> be provided to the Committee. To the extent that the Applicant objects to providing the above referenced material, the requesting party must file a Motion to Compel with the Committee. To the extent that any other party objects to providing information referenced above, the Applicant will be required to file a Motion to Compel with the Committee.

Any questions regarding this memorandum or the data requests made at the technical session should be directed to counsel to the Committee.

April 29, 2016

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