

MEMORANDUM

APPLICATION OF ANTRIM WIND, LLC

Docket No. 2015-02

TO: All Technical Session Participants

FROM: Michael J. Iacopino, Esq.

DATE: July 19, 2016

RE: Technical Session Data Requests

A technical session was held on July 12 and July 13, 2016. The purpose of the technical session was to allow all parties the opportunity to examine and question witnesses about their opinions, expertise, and pre-filed testimony. The following parties were represented during all or part of the technical session on each day: Harris Center for Conservation Education; the Town of Antrim ; Wes Enman, intervenor; the Griffin Pratt intervenors, the Audubon Society of New Hampshire (Audubon); Windaction Group (Windaction); the meteorologist intervenor group; the Levesque/Allen intervenors; the abutting property owners group; the non-abutting property owners group, Mary Maloney, Counsel for the Public and the Applicant, Antrim Wind LLC.

At the conclusion of the technical sessions, the following data requests remain outstanding and shall be answered on or before July 29, 2016.

1. The Town of Antrim will provide, in writing, the amount of tax payments that Lempster Wind made to the Town of Lempster for the years 2009 to 2014. (Richardson).
2. Windaction will provide a copy of the Google Map of the property in Lempster that was shown to Mr. Thurber. (Linowes)
3. The Town of Antrim will supply a copy of the questions asked during the straw poll and the results. (Antrim BOS)
4. Mr. Enman shall provide a copy of the questionnaire sent to Lempster residents regarding the Lempster Wind project, the cover letter that accompanied it and copies of the actual responses. (Enman)
5. Mr. Enman shall disclose source citations for the quotes provided in his testimony. (Enman)
6. Dr. Ward shall provide a list of the limitations that are not specifically stated in ISO 9613-2, as referenced in his pre-filed testimony. (Ward)

7. Dr. Ward shall provide the information/publications that support his statement in his pre-filed testimony (Page 8, line 21) that cloudiness is minimal with westerly winds. (Dr. Ward)
8. Mr. Jones shall provide all e-mail correspondence with the Stoddard Selectboard regarding Mr. Jones' participation in this docket. (Jones)
9. Mr. Jones shall provide electronic versions of the publications authored by Mr. Vanderpole (Jones)
10. Mr. Jones shall provide the minutes of any meeting of the Stoddard Board of Selectmen where the Mr. Jones was authorized to submit pre-filed testimony in this docket on behalf of the Town or any agency thereof. (Jones)
11. Audubon shall provide the minutes of the Audubon Policy Committee, the Joint Policy and Land Committee, and the minutes of the Audubon Board, where intervention in this docket was discussed and/or approved. (Audubon)
12. Audubon shall provide the minutes of the Audubon Policy Committee meetings where the 2007 Energy Conservation Policy and the 2012 NH Audubon Policy on Wind Energy Projects were discussed and/or approved. (Audubon)
13. Audubon shall provide the final policy recommendation/report that was developed collaboratively by the NGOs (AMC, Audubon and others), regarding the siting of wind projects in NH. (Audubon)
14. Audubon shall provide documentation that demonstrates the date on which the 2 cabins at Willard Pond were removed. (Audubon)
15. Audubon shall provide the total amount of revenue that Audubon received from the tree cutting on Goodhue Hill in 2011-2012, any documents relating to the decision to clear-cut in that area, and any correspondence related to same. (Audubon)
16. Audubon shall provide a full copy of the NH Forest Legacy Program Report. (Data Response DB 5-2, only had every other page). (Audubon)
17. Mr. Buscher shall provide examples of guidelines for photo simulations that govern the type of animations that were submitted with the pre-filed testimony. (Buscher - Audubon)
18. Mr Levesque shall provide an amended copy of Chris Wells' testimony, striking his title from the cover page. (Levesque)
19. Mr. Levesque shall provide a copy of the draft pre-filed testimony of Chris Wells. (Requested by Attorney Richardson objection by Mr. Levesque)

20. Mr. Levesque shall provide a narrative of the algorithms and the assumptions, including the equalized assessed value of the property in Antrim over time, that were used in the excel financial model described in Mr. Levesque's pre-filed testimony. (Levesque)
21. Mr. Levesque shall provide an explanation for the source of the statement in Mr. Levesque's pre-filed testimony on Page 2, Lines 16-18, that the PILOT agreement gives away over 5 million dollars in revenue over the life of the project. (Levesque)
22. Mr. Levesque shall provide a calculation of the total amount of revenue that was billed by Mr. Levesque's company for biomass projects, broken down by heating vs. electric generation, during the last 5 years. (Requested by Attorney Richardson objection by Mr. Levesque.)
23. Ms. Allen shall provide a list of the nearby protected areas that are referenced in her pre-filed testimony at Page 8, Line 23. (Allen)
24. Ms. Linowes shall provide the spreadsheets that support the answer provided to the Applicant's data request #5. (Linowes)
25. Ms. Linowes shall provide the Boston Globe article that contained a discussion about long-term PPAs. (Linowes)
26. Ms. Linowes shall provide the calculations used in converting energy prices from natural gas in pounds per MMBtu to energy hours per MW hour. (Linowes)
27. Mr. Block shall provide a list of the scenic resources that Landworks should have identified, but failed to identify, in its Visual Impact Assessment. (Block)
28. Mr. Block shall identify the resources that Landworks "screened out" of the Visual Impact Assessment and the reasons why those should have been included in the VIA. (R. Block)
29. Ms. Carey-Block shall provide the "soon to be released infrasound health study findings," referenced in Exhibit LB-3 (Animal Deaths Article) to her pre-filed testimony, if those findings have been released. (L. Carey-Block)
30. Each non-abutting intervenor shall provide a statement as to how the project, if constructed, will personally impact each of them, if not already included in pre-filed testimony. (R. Block, L. Block, Law, Henninger, and Voelcker)
31. Ms. Connelly shall explain why "user activity" was included in the rating sheet, how "user activity" is used in the methodology, and where the "user activity" methodology is articulated in the submittal, and why it is not included in the BLM form/method. (Connelly)

32. Ms. Connelly shall provide an explanation about whether the BLM methodology includes a “worst case” scenario provision and where within the methodology that provision is located.
33. For the 105 miles of the conservation land used in the GIS analysis, Ms. Connelly shall provide the breakdown between public and private land (percentage of each), the portion of the conserved land that was conserved for scenic purposes (in percent), and the conservation purpose generally (i.e. wildlife, water quality). (Connelly)

The foregoing shall be provided to all of the parties on or before July 29, 2016. Copies shall not be provided to the Committee. To the extent that the any party objects to providing the above referenced material, the requesting party must 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.



July 19, 2016

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