



January 13, 2016

Martin P. Honigberg, Esq.  
Chairman  
New Hampshire Site Evaluation Committee  
21 South Fruit Street, Suite 10  
Concord, NH 03301-2429

**RE: NH Site Evaluation Committee Docket No. 2015-02: Application of Antrim Wind Energy, LLC for a Certificate of Site and Facility for Construction of a Wind Project in Antrim New Hampshire**

Dear Chairman Honigberg:

Pursuant to RSA 541 – A:32 and the New Hampshire Code of Administrative Rules, Site 202.11, please find for filing with the New Hampshire Site Evaluation Committee (the “Committee”), the International Brotherhood of Electrical Workers’ (“IBEW”) Petition to Intervene in the above captioned matter, and a corresponding Certificate of Service.

Thank you.

Very truly yours,

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Joseph Casey  
International Representative  
for Business Development,  
International Brotherhood of  
Electrical Workers

Enclosures

Cc: Distribution List for Docket No. 2015-02

**STATE OF NEW HAMPSHIRE  
SITE EVALUATION COMMITTEE**

_____ )	
RE: )	
Application of Antrim Wind Energy, LLC )	
for a Certificate of Site and Facility for )	SEC DOCKET No. 2015-02
Construction of a Wind Project )	
in Antrim New Hampshire )	
_____ )	

**PETITION TO INTERVENE OF THE  
INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS**

Now comes the Petitioner, the International Brotherhood of Electrical Workers (“IBEW”), and pursuant to RSA 541 – A:32 and Site 202.11 of the New Hampshire Code of Administrative Rules, hereby respectfully petitions the Site Evaluation Committee (“the SEC” or “the Committee”) to permit it to intervene in the above captioned matter. In support of its petition, the International Brotherhood of Electrical Workers states as follows:

1. On October 2, 2015, Antrim Wind Energy, LLC filed an application for a Certificate of Site and Facility with the Site Evaluation Committee.
2. Petitioner, the International Brotherhood of Electrical Workers, is a labor organization representing more than three thousand (3,000) employees in New Hampshire. Most of these employees reside in the state of New Hampshire.
3. The International Brotherhood of Electrical workers have an interest in the proposed facility because of their expertise and experience in constructing wind turbines. Furthermore, the proposed facility will produce clean energy. The IBEW asserts that future employment of those which they represent depend greatly on the development of clean energy. Petitioner asserts that the development of the proposed facility has the potential to begin a trend of similar clean energy facilities being constructed. Additionally, the IBEW asserts that development of clean energy facilities similar to the proposed facility in the above captioned matter, that employ New Hampshire citizens will greatly benefit local businesses, New Hampshire workers, and their families.
4. The IBEW has a substantial interest in the above captioned matter that may be affected by the proceeding because they would be prospective recipients of the contract to construct the proposed 9-turbine wind farm on behalf of Antrim Wind Energy, LLC. This represents approximately 84 full-time

positions during the construction and 12 full-time positions for the life of the project that the International Brotherhood of Electrical Workers' employees could potentially fill. Given the substantial and specific interest that the IBEW has in the proposed facility, we do not believe that any other party to this proceeding can adequately represent the interests of the International Brotherhood of Electrical Workers.

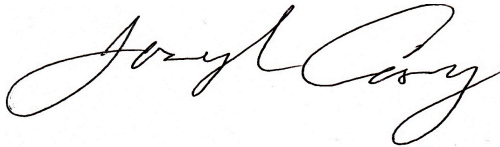
5. The International Brotherhood of Electrical Workers respectfully requests the Committee to consider granting this Petition to Intervene because there are no alternative proceedings in which the IBEW's substantial interest in the outcome of this matter can be protected.
  
6. The intervention of the International Brotherhood of Electrical Workers will be in the interest of justice and will not impair the orderly and prompt conduct of the proceedings by allowing the intervention. The IBEW files this Petition to Intervene by the deadline set forth by the Committee for Docket 2015-02 and requests that it be permitted to intervene with full standing to participate in all phases and activities of the proceeding. The International Brotherhood of Electrical Workers respects the importance of carrying out an orderly and timely proceeding that will not unduly delay the Committee or the parties in reaching an outcome in the above captioned matter. Furthermore, the International Brotherhood of Electrical workers is resolved to work closely with the other parties involved in the matter in the interest of maintaining order, and respectfully offer's that the IBEW's participation, if permitted by the Committee, would be in the interest of justice.

**REQUEST FOR RELIEF**

WHEREFORE, the International Brotherhood of Electrical Workers respectfully requests that the Site Evaluation Committee issue an order granting its Petition to Intervene and granting such other and further relief as it deems appropriate and necessary.

Dated this 13th day of January, 2016

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Joseph Casey". The signature is written in black ink on a white background.

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On Behalf of the International Brotherhood of Electrical Workers  
Joseph Casey  
International Representative for Business Development  
International Brotherhood of Electrical Workers

**CERTIFICATE OF SERVICE**

I hereby certify that, on the date written below, I served the enclosed Petition to Intervene to be served via first class or electronic mail as provided in New Hampshire Administrative Code, Site 202.07, to the persons/parties named on the enclosed Distribution List of this Docket.

Date: 1/13/2016

A handwritten signature in cursive script that reads "Joseph Casey".

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On Behalf of the International Brotherhood of Electrical Workers  
Joseph Casey  
International Representative for Business Development  
International Brotherhood of Electrical Workers