Robert Scott, Chairman c/o Pamela G. Monroe, Administrator New Hampshire Site Evaluation Committee 21 South Fruit Street, Suite 10 Concord, New Hampshire 03301-2429

pamela.monroe@sec.nh.gov

RE: Docket No. 2015-02 Application of Antrim Wind Energy, LLC for a Certificate of Site and Facility

Dear Chairman Scott,

Attached please find for filing in this matter the Motion to Intervene of Richard Block and Loranne Carey Block.

Sincerely,

Richard Block Loranne Carey Block 63 Loveren Mill Road

Antrim, New Hampshire 03440

Foranne Carey Block

STATE OF NEW HAMPSHIRE SITE EVALUATION COMMITTEE

RE: Application for a Certificate of Site and Facility By Antrim Wind Energy, LLC)
)
SEC Docket Number 2015-02)

MOTION TO INTERVENE *PRO SE* OF RICHARD BLOCK AND LORANNE CAREY BLOCK

Pursuant to the New Hampshire Site Evaluation Committee Rules Site 202.11 and RSA 541-A:32, Richard Block and Loranne Carey Block hereby move for permission to intervene *pro se* in the above-referenced proceeding. In support of their Motion to Intervene, Richard Block and Loranne Carey Block offer the following arguments:

(1.) Richard Block and Loranne Carey Block can demonstrate a substantial interest which may be affected by the outcome of the proceeding.

Richard Block and Loranne Carey Block have been residents and voters of Antrim since 1988. They own and reside on approximately 242 acres of property on Loveren Mill Road, from one-half to one-and-a-half miles from and directly facing and in full view of Tuttle Hill, the site of the proposed Antrim Wind Energy, LLC turbines. Concern for the potential noise, visual disturbance, and negative effect on their property value has caused Richard Block and Loranne Carey Block to actively participate and oppose this proposed project from the beginning, as litigants and intervenors in several Superior Court cases against the Town of Antrim and as approved Intervenors and Committee-designated spokespersons in all three prior SEC proceedings relating to Antrim Wind Energy, LLC (Dockets 2011-02, 2012-01, and 2014-05).

(2.) The interest of Richard Block and Loranne Carey Block will not be adequately protected by other parties.

In exercising its discretion, we respectfully ask that the Committee consider whether the party's interest will be adequately protected by other parties. Since we, as residents of the North Branch region of Antrim where the proposed wind facility would be constructed, are concerned that our interests have not been fairly addressed thus far by the Town Boards of Antrim, we do not believe that any other party to this proceeding can adequately represent our interests in proceedings before the Committee.

(3.) The intervention of Richard Block and Loranne Carey Block will be in the interest of justice and will not impair the orderly and prompt conduct of the proceedings by allowing the intervention.

We petitioned for and were granted Intervenor status in Antrim Wind Energy, LLC's prior cases before the Committee (SEC Dockets 2011-02, 2012-01, and 2014-05), served in those hearings as spokespersons for the North Branch group of intervenors, and as such understand and respect the hearing process.

Pursuant to the SEC Order of December 4, 2015, Richard Block and Loranne Carey Block file this Motion to Intervene by the deadline set forth by the Committee for Docket 2015-02 and request that we be permitted to intervene with full standing to participate in all phases and activities of the proceeding. We respect the importance of conducting this proceeding in an orderly manner that will not unduly delay the Committee or the parties in reaching an outcome. We are prepared to work closely with other parties to the proceeding in the interest of maintaining order and respectfully offer that our participation, if permitted, would be in the interest of justice.

Dated this 14th day of January, 2016.

Foranne Carey Block

Respectfully submitted,

Richard Block

Loranne Carey Block 63 Loveren Mill Road

Antrim, New Hampshire 03440

603-588-2552

snowstar@tds.net