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\*Also admitted in MA \*\*Also admitted in MA & NY \*\*\*Also admitted in DC, MA, ME, and the USPTO Please respond to the Portsmouth office

August 15, 2016

New Hampshire Site Evaluation Committee Pamela G. Monroe, Administrator 21 South Fruit Street, Suite 10 Concord, NH 03301

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 - Motion to Extend Deadline for

**Supplemental Testimony** 

Dear Ms. Monroe:

Please find enclosed for filing in the above-captioned matter, an original and one copy of the Town of Antrim's Motion to Extend Deadline for Supplemental Testimony.

I have provided members of the distribution list with electronic copies of this Motion, based on the most recent list on the Committee's website for this proceeding.

Please contact me directly should you have any questions.

Very truly yours

Justin C. Richardson

jrichardson@uptonhatfield.com

JCR/nm Enclosure

cc:

**Distribution List** 

## BEFORE THE STATE OF NEW HAMPSHIRE SITE EVALUATION COMMITTEE

## Application of Antrim Wind, LLC NHSEC No. 2015-02

## MOTION TO EXTEND DEADLINE FOR SUPPLMENTAL TESTIMONY

NOW COMES the Town of Antrim, by and through Upton & Hatfield, LLP, and moves to extend the date to file its Supplemental Testimony as follows:

- 1. Supplemental testimony is due August 15, 2016.
- 2. Due to the unavailability of counsel for personal reasons, the Town of Antrim requests a 3-day extension to provide supplemental testimony on Thursday August 18, 2016.
- 3. A 3-day extension "will promote the orderly and efficient conduct of the proceeding and assist in resolving the case fairly" within the meaning of Site 202.17. It will allow the Committee to have the benefit of the views of the Town's governing body in written form, as contemplated by RSA 162-H:16, IV. It will not impact any other deadline in the procedural schedule.
- 4. Counsel for the Public, N.H. Audubon, the Stoddard Conservation Commission,
  Benjamin Pratt, John Griffin, assent to this request. The Stoddard Conservation Commission and
  Richard & Loranne Block (non-abutting) stated that they also intended to request an extension to
  the same date. The Wind Action Group and Janice Longgood oppose this motion. The
  Applicant and remaining parties had not taken a position as of filing this motion.

WHEREFORE Antrim respectfully requests that the Committee grant this motion and allow the Town of Antrim to file its Supplemental Testimony on August 18, 2016.

<sup>&</sup>lt;sup>1</sup> Undersigned counsel purchased a home, finalized divorce and relocated during the month of July, while preparing for trials and/or hearings on other matters that could not be delegated.

Respectfully submitted,

Town of Antrim

By Its Counsel,

UPTON & HATFJELD, LLP

Date: August 15, 2016

By:

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## **CERTIFICATION**

I hereby certify that a copy of the foregoing was this day forwarded to all parties in this proceeding by electronic mail.

Justin C. Richardson