

**THE STATE OF NEW HAMPSHIRE  
SITE EVALUATION COMMITTEE**

**Docket No. 2015-02**

**APPLICATION OF ANTRIM WIND ENERGY, LLC  
FOR A CERTIFICATE OF SITE AND FACILITY**

**INTERVENOR'S OBJECTION TO APPLICANT'S MOTION TO STRIKE CERTAIN  
SUPPLEMENTAL PRE-FILED TESTIMONY**

NOW COMES the Allen/Levesque Intervenors ("Intervenors") respectfully submits this Objection to the Antrim Wind Energy, LLC (referred to as "Applicant") Motion To Strike Certain Supplemental Pre-Filed Testimony filed with the SEC ("Committee") filed on August 26, 2016.

1. On March 25, 2016, the Committee issued a Procedural Schedule stating that Supplemental Pre- Filed Testimony was due on August 15, 2016. At the request of several of the parties, the Committee issued an Order on August 15, 2016, extending that deadline to August 18, 2016.

2. On July 13, 2016, the Committee held a technical session for the intervenor and Counsel for the Public's witnesses. During the technical session, Counsel for the Committee discussed the deadline for filing supplemental pre-filed testimony and the appropriate purposes for such testimony. At that session, Counsel for the Committee reviewed the long-standing practice of the Committee, stating that supplemental testimony is not intended to allow parties to submit additional material or make arguments that they could have made at the time initial pre-filed testimony was due. Rather, it is intended for parties to provide information that was not available to them at the time their original pre-filed testimony was filed.

3. On August 26, 2016, the Applicant filed a Motion to Strike Certain Supplemental Pre-Filed Testimony. In this Motion, Applicant argues that the supplemental testimony filed by the August 18, 2016 deadline by Mr. Block, Ms. Law and Mr. Cleland, Ms. Berwick, and Mr. Jones does

not reference any information that was unavailable to them at the time their initial pre-filed testimony was filed. The Applicant further argues that this supplemental testimony improperly seeks to introduce new material that could have been included in their initial testimony and that it should be stricken from the proceeding as a result.

4. The Applicant did not include it in their Motion to Strike but the Town of Antrim's supplemental testimony also introduces new material that could have been included in their initial testimony and so also does not meet the Committee's long standing practice of not allowing this in supplemental testimony. The Allen/Levesque Intervenor group objects to the Applicant's Motion to Strike to the extent that it does not include all supplemental testimony filed that does not meet the Committee's standard and specifically that filed by the Town of Antrim.

5. The Allen/Levesque Intervenor group respectfully requests that, should the Committee decide to grant Applicant's Motion to Strike this supplemental testimony, that it also include the Supplemental Testimony filed by the Town of Antrim Board of Selectmen.

Respectfully submitted,

A handwritten signature in blue ink that reads "Charles A. Levesque". The signature is written in a cursive style with a large initial "C".

Charles A. Levesque, for the Allen/Levesque Intervenor Group

Dated: August 31, 2016

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Certificate of Service

I hereby certify that, on the date written below, I caused this Motion to be served by electronic mail as provided in NH Administrative Code, Site 202.07, to the Distribution List available on the SEC website for this docket.

A handwritten signature in black ink that reads "Charles A. Levesque". The signature is written in a cursive, flowing style.

August 31, 2016

Date:

Charles A. Levesque