

**STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE**

Docket No. 2015-02

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

**OBJECTION OF ANNIE LAW AND ROBERT CLELAND TO
MOTION TO STRIKE CERTAIN SUPPLEMENTAL TESTIMONY**

NOW COME Annie Law and Robert Cleland (“Intervenors”), and respectfully submit this objection to a motion filed by Antrim Wind Energy LLC (“AWE” or the “Applicant”) seeking to strike certain supplemental testimony. In support of this objection, the Intervenors state the following:

I. Background

1. On March 25, 2016, the Committee issued the procedural schedule for this docket stating that supplemental pre-filed testimony was due on August 15, 2016. The Committee issued a second order on August 15, 2016 granting an extension until August 18, 2016.

2. The Intervenors submitted their supplemental pre-filed testimony on August 18, 2016 in accordance with the Committee’s requirements. The Intervenors’ supplemental filing consisted of two documents. The first document contained the supplemental testimony of the Intervenors. The second was a Property Value Impact & Zoning evaluation involving a Municipal Wind Project proposed for Brewster, Massachusetts. The impact study was prepared by Michael S. McCann, a State Certified General Real Estate Appraiser. Mr. McCann is not an expert witness in this proceeding but he previously appeared before the Committee in that capacity. (SEC Docket #2010-01, Groton Wind).

3. The Intervenors appeared at the July 12-13, 2016 technical session and were available to answer questions as part of the non-abutting property owner panel. The Intervenors, and each of the other

non-abutting property owners were asked by Attorney Justin Richardson to individually state how construction of the project would impact their lives. While there is no transcript of the technical session, the Annie Law described the peace and solitude of the mountain, as well as the abundance of wildlife. She explained how they value these attributes of the area and how the area would be greatly affected in the event of the wind farm being approved. The Intervenor also stated that their property value would be greatly reduced and they would not be able to sell their home if the wind farm was approved and constructed.

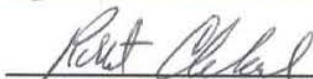
II. Argument

It is the Intervenor's understanding that supplemental testimony could include materials which address topics or support issues raised during any technical session that is scheduled after pre-filed testimonies have been filed. The Intervenor's supplemental information was filed in a timely manner and its intent was to provide a more complete response to questions asked of the Intervenor during the technical session. Perhaps the connection to the technical session should have been made more apparent in the supplemental testimony, but this should not negate the Intervenor's intent to elaborate on why they believe their property value will be harmed if the project is constructed. It now appears that the Applicant is trying to distort or disregard the dialogue that happened between the parties during the technical session. Such an action should not be rewarded.

WHEREFORE, in view of the foregoing, the Intervenor respectfully request that the Committee deny the Applicant's motion to strike and permit their supplemental testimony to remain in the record.

Dated this day of September 2, 2016





cc: Parties to Docket 2015-02