

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

In the matter of the)
Application for Certification)
Pursuant to RSA 162-H of)
Antrim Wind Energy, LLC)
_____)

Docket No. 2015-02

**MOTION OF COUNSEL FOR THE PUBLIC FOR ADDITIONAL FUNDS
FOR KELLIE CONNELLY AND FOR AN ORDER DIRECTING
ANTRIM WIND ENERGY LLC TO BEAR THE COSTS THEREOF**

NOW COMES Counsel for the Public, and hereby moves, pursuant to RSA 162-H:10, V, for additional funding in the amount of \$10,000 for Kellie Connelly, Counsel for the Public’s visual impacts expert in order for MS. Connelly to complete her work in this matter, and for an order directing Antrim Wind Energy, LLC (“AWE” or “Applicant”), to bear the costs thereof. In support hereof, Counsel for the Public respectfully represents as follows:

1. On February 16, 2016 the N.H. Site Evaluation Committee (Committee) granted Counsel for the Public’s Motion to Retain Kellie Connelly as a visual impacts expert in the instant matter determining that “Ms. Connelly’s services will assist Counsel for the Public and the Subcommittee in determining in the impact of the Project, as currently proposed, on the aesthetics of the region.” See, *Application of Antrim Wind Energy, LLC for a Certificate of Site and Facility*, N.H. Site Eval. Comm., # 2015-02; Order on Motion to Retain Consultant, 2/16/16, p. 3.

2. At that time Ms. Connelly estimated the cost of her services to be \$68,400.00 and the Committee ordered AWE to pay Ms. Connelly's costs and expenses up to that amount. *Id.* In addition the Committee stated that "[i]f further expenses are to be incurred, Counsel for the Public shall notify the Subcommittee with an appropriate motion." *Id.* p. 4

3. Ms. Connelly has notified Counsel for the Public that despite her best efforts to keep costs within that budget, she's had additional unanticipated costs and expenses in the way of subcontractor costs, a 2nd site visit, and review of extensive rebuttal testimony that was filed AWE's visual impacts expert. Ms. Connelly indicated that she will need an amount not to exceed \$10,000 to complete her work in this matter.

4. Counsel for the Public has contacted counsel for AWE seeking AWE's assent and has been advised that AWE assents to this motion. Due to the nature of the relief requested, Counsel for the Public did not seek assent of the other parties.

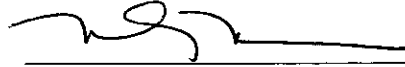
5. WHEREFORE, Counsel for the Public requests that the SEC enter an order:

- a. Authorizing additional funding of \$10,000 for Counsel for the Public's visual impact expert pursuant to RSA 162-H:10, V:
- b. Directing the Applicant to bear the additional fees and costs; and
- c. Granting such other relief as may be just.

Respectfully submitted

COUNSEL TO THE PUBLIC
By his attorney

JOSEPH A. FOSTER
ATTORNEY GENERAL



Dated: 9/21/16

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Certificate of Service

I, Mary E. Maloney, do hereby certify that I caused the foregoing to be served upon each of the parties named in the Service List of this Docket.

Dated: 9/21/16



Mary E. Maloney