



November 21, 2016

Pamela G. Monroe
Administrator
Site Evaluation Committee
21 S. Fruit Street, Suite 10
Concord, NH 03301-2429

Ref: Docket 2015-02 Antrim Wind Energy

Dear Ms Monroe

Please find enclosed for filing the Post Hearing Memorandum of the Harris Center for Conservation Education.

Respectfully submitted



Stephen Froling
Corporate Counsel
Harris Center for Conservation Education

STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE

Docket 2015 - 2

REF: Antrim Wind Energy, LLC

Application for Site and Certificate

POST HEARING MEMORANDUM OF INTERVENOR,
HARRIS CENTER FOR CONSERVATION EDUCATION

Comes now the Intervenor, Harris Center for Conservation Education (“HCCE”), by its undersigned counsel, and as and for its Post Hearing Memorandum, respectfully shows:

1 HCCE has been neutral in this matter from start to finish. As we said in our Petition for Intervention (¶ 11):

“For the avoidance of doubt, HCCE wishes to state that it should not be identified as ‘for’ the Proposal or ‘against’ the Proposal. It is ‘for’ a full development of the facts and ‘for’ a decision based on science.”

2 HCCE has not presented any evidence in this matter nor has it examined any witness.

3 Nevertheless, there has been speculation by various parties and assertions that inferences may be drawn from HCCE’s silence. We urge the Committee to disregard those assertions and to decide the matter without relying on HCCE’s silence as evidence of any material fact.

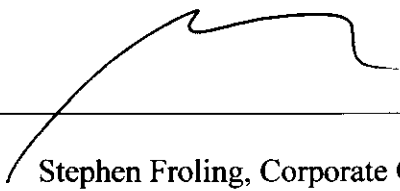
4 HCCE has expressed the following view in various Letters of Intent in evidence (*See. e.g., AWE Land Conservation and Mitigation Package, pages 12 (Ott), 54 (Cotran), 72 (P Whittemore), 94 (Micheli), 115 (H Whittemore)*):

“The Parties [being HCCE, AWE and various named landowners] further recognize that, if the Project proceeds, the Agreement and Easement will make a valuable contribution to the conservation interests of stakeholders in this region.”

Respectfully submitted,

HARRIS CENTER OF CONSERVATION EDUCATION

By _____


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CERTIFICATE OF SERVICE

I hereby certify that the within Memorandum was served this day by electronic mail to all parties shown on the current service list in this Docket.



Stephen Froling

Dated: November 21, 2016