THE STATE OF NEW HAMPSHIRE SITE EVALUATION COMMITTEE

Docket No. 2018-01

PETITION OF THE ANTRIM WIND OPPONENTS FOR DECLARATORY RULING

<u>PETITIONERS' OBJECTION TO ANTRIM WIND ENERGY'S</u> <u>MOTION TO DISMISS PETITION FOR DECLARATORY RULING</u>

NOW COME the Petitioners, 104 individuals, commissions, and entities listed and identified in the list attached hereto as Exhibit 1 ("the Petitioners"), by and through their attorneys, Donahue, Tucker, & Ciandella, PLLC and, pursuant to Rule Site 202.14 (g), hereby object to Antrim Wind Energy, LLC's ("AWE") Motion to Dismiss Petition for Declaratory Ruling. In support thereof, the Petitioners state as follows.

I. FACTUAL AND PROCEDURAL HISTORY

- 1. On March 17, 2017, the Site Evaluation Committee ("SEC") issued an Order and Certificate of Site and Facility with Conditions ("the Certificate") in SEC Docket No. 2015-02 ("Antrim II"), authorizing the construction of nine wind turbines on Tuttle Hill in the Town of Antrim, New Hampshire ("the Project").
- 2. The Certificate provides that (1) AWE "shall immediately notify the Committee of any change in ownership or ownership structure of [AWE] or its affiliated entities and shall seek approval of the Committee for such a change"; and (2) "prior to construction of the Project, [AWE] shall provide documentation demonstrating that debt and/or equity financing required for the construction of the Project is in place to the Committee's Administrator." Certificate at 5.
- 3. On December 21, 2017, Walden Green Energy, LLC ("WGE") submitted a letter to Pamela Monroe, the SEC's Administrator, stating:

Construction equity for the Project will be provided by [WGE], AWE's parent, by RWE Supply and Trading GmbH... Walden Green Energy's majority investor. RWEST is funded by RWE, AG. The ownership, control and flow of equity capital to construct the Project remain entirely consistent with the capitalization program represented during hearings in Docket 2015-02.

See Exhibit 4 to Petition.

- 4. That same day, RWE PI Walden Holding, LLC submitted a letter to Ms. Monroe, echoing WGE's statements that the Project could be funded by 100% equity and that RWE was willing and able to finance the entirety of the Project through equity. See Exhibit 5 to Petition.
- 5. On January 24, 2018, Petitioners, Mary Allen, Richard Block, Annie Law, and Windaction, LLC ("Intervenors"), filed a response to the above-referenced letters, arguing that AWE's letters were inconsistent with AWE's prior representations to the SEC and were inconsistent with the conditions contained in the Certificate and that "the Committee should find the Project is out of compliance with the Certificate." Exhibit 6 to Petition.
- 6. On January 29, 2018, Counsel for the Public ("CFP") filed a Response to Walden Green Energy, LLC's Notice of Financial Documentation, raising similar arguments and requesting that the SEC suspend the Certificate. See Exhibit 7 to Petition.
- 7. On February 8, 2018, Ms. Monroe sent a letter to the Intervenors and Counsel for the Public in which she, and not the SEC, determined that the letters from Messrs. Weitzer and O'Reilly satisfied the conditions in the Certificate. Ms. Monroe concluded, "[a]ccordingly, the Site Evaluation Committee will not hold a hearing on either the Weitzner and O'Reilly correspondence or your responses." See Exhibit 9 to Petition.
- 8. On March 7, 2018, the Intervenors in <u>Antrim II</u> filed a Joint Motion to Reconsider of Decision of Administrator, for Adjudicative Hearing to Determine Satisfaction of Condition

of Certificate of Site and Facility, and to Suspend Certificate of Site and Facility ("Intervenor's Motion").

- 9. On March 27, 2018, the SEC denied the Intervenor's Motion, stating that (1) the Antrim II docket was closed; (2) the Committee's rules establish a process for responding to complaint and determining whether there is a violation of a condition; and (3) that the procedural avenue through which the intervenors should seek relief is through the filing of a petition for declaratory ruling in accordance with Site 203.01. See Order on Joint Motion Filed in Docket No. 2015-02, Application of Antrim Wind Energy, LLC for a Certificate of Site and Facility, at 3 (dated March 27, 2018) ("Chairperson's Order").
- 10. On April 6, 2018, the Petitioners filed a Petition for Declaratory Ruling ("Petition") pursuant to Rule 203.01 and a Motion to Waive the \$3,000.00 filing fee for the submission of the Petition.
- On April 27, 2018, AWE filed a Motion to Dismiss Petition for Declaratory Ruling.
 - 12. The Petitioners hereby object to AWE's Motion to Dismiss.

II. <u>DISCUSSION</u>

AWE asserts seven reasons in support of its Motion to Dismiss: (A) the Petition is defective because the Petitioners did not pay the \$3,000.00 filing fee; (B) the Petitioners waived arguments as to the delegation of authority to the SEC administrator because the Petitioners did not challenge such conditions through a motion for rehearing in accordance with RSA 540:3; (C) the Petitioners' arguments are premised upon a misreading of the financing condition; (D) the Petition seeks relief which is not available through a declaratory ruling; (E) the Petitioners have not identified any particularized legal rights that entitle them to the requested

relief; (F) the decision to finance the project with full equity is not a material change and is consistent with all certificate conditions; and (G) suspension would be procedurally improper.

14. The Petitioners object to AWE's Motion to Dismiss and will address each argument raised by the SEC below.

A. The Petition Should Not Be Dismissed For Failure To Pay The Filing Fee

- The Petition should not be dismissed for failure to pay the filing fee because the Petitioners sought a waiver of the filing fee at the time the Petitioners submitted the Petition. As reflected in the Petitioner's Motion to Waive, the Petitioners filed the Petition under protest following the Petitioners' efforts to raise concerns associated with AWE's compliance with the Certificate in the Antrim II docket. If the SEC denies the Petitioners' Motion to Waive and orders the Petitioners to pay the filing fee, then the Petitioners will address the filing fee matter at that time. However, until the SEC addresses the Petitioners' Motion to Waive, dismissal is premature.
- Moreover, while AWE makes arguments as to why the Petitioner's Motion to Waive should be denied, AWE cites to no authority to support the proposition that the Petition can be denied based solely on the failure to pay a filing fee, let alone in circumstances when the Petitioners have a motion pending for relief from the filing fee. AWE does not assert that the failure to pay the fee is a jurisdictional defect which requires dismissal, nor can the Petitioners find any authority to support such a proposition.¹
- 17. Further, while RSA 162-H:8-a requires the payment of filing fees, there is no express prohibition on the waiver of such fees, and, as a matter of public policy and due process,

AWE asserts that the Chairperson ordered the Petitioners to pay the filing fee. AWE misreads the Chairperson's order. The SEC merely suggested that if a letter were sent with the filing fee, the SEC would treat the previously submitted Joint Motion to Reconsider as a Petition for Declaratory Ruling. There is no statement in the Chairperson's order that could be read to pre-emptively deny the Motion to Waive as it relates to the filing fee.

the SEC should not interpret RSA 162-H:8-a as prohibiting the grant of such a waiver. It is a fundamental tenet of our State Constitution that access to justice cannot be prohibited by the imposition of fees. Cf. Brown v. Brown, 112 N.H. 410 (1972) ("due process prohibits a State from denying access to its courts because of inability to pay") (cases cited); see also N.H. Const. Part I, Article 14. As stated in Petitioners' Motion to Waive, given the public interest being asserted and the basis of the relief sought, the SEC should grant the Motion to Waive and should not dismiss the Petition for failure to pay the filing fee.²

- B. The Petitioners Have Not Waived The Argument Regarding Delegation To The Administrator
- 18. AWE asserts that the Motion to Waive should be dismissed because the Petitioners waived any argument as to the delegation of authority to the SEC's administrator by failing to raise such an issue through a timely filed motion for rehearing. AWE's argument should be rejected because the Certificate does not delegate any authority to the SEC's administrator to make compliance determinations. The Petitioners could not have sought rehearing to a non-existent provision of the Certificate. Indeed, the absence of any such delegation is a fundamental argument raised in the Petition: at Paragraph 24 of the Petition, the Petitioners state that "[a]t no place in the Certificate has the SEC actually delegated to the administrator the role of determining the sufficiency of the documentation provided by AWE, particularly when the sufficiency of that documentation is in dispute."
- 19. In short, AWE's argument that the Petitioners waived any challenge to the delegation of authority to the SEC's administrator should be rejected. The Petitioners do not

² To address AWE's argument that there is no support for the assertion that AWE should be required to pay the filing fee, the Petitioners' assertion is predicated upon the fact that AWE is attempting an end-run around the conditions of the Certificate and AWE's representations to the SEC, as such the SEC is authorized to impose on AWE the costs and expenses associated with determining AWE's compliance with the Certificate. See RSA 162-H:12, V.

contest that the SEC's administrator was the proper recipient of AWE's letters. What the Petitioners challenge is the SEC's administrator's actions taken after receipt of those letters, namely unilaterally determining that those letters were consistent with the Certificate and consistent with AWE's representations to the SEC in the application and the hearings on the merits.

C. The Petitioners Have Not Misread The Financing Condition In The Certificate

- AWE next asserts that the Petition should be dismissed because the Certificate only required AWE to submit letters to the SEC's Administrator, which AWE did. AWE asserts that the Certificate does not require hearings or factual determinations to review the sufficiency of the materials supplied by AWE.
- AWE's argument effectively renders perfunctory the financing condition in the Certificate, devoid of any meaning or effect. As is stated in the Petition, the conditions in the Certificate must be interpreted and informed by the representations made by AWE in the Application and throughout the hearings on the merits. Cf. 1808 Corp. v. Town of New Ipswich, 161 N.H. 772, 775 (2011); Rye v. Ciborowski, 111 N.H. 77, 81 (1971). Under AWE's reading, once the Administrator receives pieces of paper purporting to address the financing condition, the SEC has no further role; AWE is free to finance the Project however it sees fit, regardless of AWE's prior representations. The Certificate cannot be read or interpreted to bring about such an absurd result. See generally STIHL, Inv. v. State of N.H., 168 N.H. 332, 338 (2015) (Court "will not interpret statutory language in a literal manner when such a reading would lead to an absurd result").
- 22. The crux of the Petitioners' argument is this: AWE provided documentation that was fundamentally different from AWE's representations to the SEC; Counsel for the Public and

Intervenors challenged the sufficiency of that documentation in formal filings to the SEC; and the SEC did not address the issues raised by the Intervenors and Counsel for the Public. The Petitioners are challenging the process employed and the sufficiency of the letters provided. The Petitioners have not misread any provision of the Certificate. The Petitioners are challenging the summary process that has been employed and is likely to be employed again which effectively removes them from meaningful involvement in further matters of compliance.

D. The Petitioners Are Seeking Proper Relief Through A Declaratory Ruling

- AWE next asserts that the Petition should be dismissed because the relief in the Petition sought does not fit within the definition of a "declaratory ruling" under RSA chapter 541-A. AWE's argument ignores that the Petitioners filed the Petition at the invitation of the SEC's Chairperson. See Order on Joint Motion Filed in Docket No. 2015-02, Application of Antrim Wind Energy, LLC for a Certificate of Site and Facility, at 3 (dated March 27, 2018) ("The Complainants do, however, have an administrative avenue to seek the relief requested by filing a petition for declaratory ruling in accordance with Site 203.01"). The Petitioners relied upon the Chairperson's suggestion and filed the Petition in accordance with Rule Site 203.01.
- Moreover, a petition for declaratory ruling is the proper procedural avenue for the relief sought by the Petitioners. RSA 541-A:1, V defines "declaratory ruling" as "an agency ruling as to the specific applicability of any statutory provision or of any rule or order of the agency." Here, the Petitioners are seeking a declaratory ruling as to applicability of RSA 162-H:4 (III) to the Certificate in this matter, particularly with regard to the financing contingency. The Petitioners are specifically seeking a ruling as to what degree the SEC, and not its administrator, has to ensure AWE's compliance with the financing contingency and other conditions. Further, the Petitioners challenge the applicability of Rule Site 301.17(d) and Rule

Site 302.01 to the extent AWE or the SEC rely upon that rule for the proposition that the SEC administrator is authorized to determine AWE's compliance with the Certificate. Such determinations squarely fit within the definition of a "declaratory ruling."

25. AWE further asserts that the SEC should deny the Petition because "there is no need to keep the [Antrim II] docket open in order to allow the SEC to perform its function." AWE's Motion at para. 33. In support of its argument AWE references the Chairperson's March 27, 2018 Order that the Antrim II docket is "not an open docket."

AWE's argument ignores that in seeking to keep the docket open, the Petitioners seek to continue to avail themselves of the procedural rights established under RSA chapter 541-A applicable to adjudicatory hearings and Site Rule 202. Such matters clearly involve the applicability of the provisions of RSA chapter 541 that establish the procedures required for contested cases. See RSA 541-A:1, IV (defining "contested cases"); RSA 541-A:31 (establishing requirements for adjudicatory hearings in contested cases). Therefore, the relief sought by the Petitioners clearly falls within the scope of a declaratory ruling under RSA 541-A:1 (V) because they seek a ruling as to the applicability of both a statute (RSA chapter 541-A:31, et. seq.) and a rule of the SEC (Rule Site 202).³

³ AWE's assertion that the Petition should be dismissed because the Petitioners should seek relief through a declaratory judgment action in the Superior Court is disingenuous. This Petition was expressly invited by the SEC's Chairperson. It is certainly not beyond the realm of plausibility that, if the Petitioners filed a declaratory judgment action in Superior Court, AWE would seek to dismiss such a petition for failure to exhaust administrative remedies.

The Petitioners filed this Petition with the SEC at the suggestion of the SEC. The relief sought in the Petition challenges the procedures utilized by the SEC and may impact the SEC's administration in both the Antrim II docket and other dockets. In other words, it is a matter that the SEC should have the initial opportunity to address.

AWE has yet to cite to a specific statute to support the proposition that the Antrim II docket is closed. Rather, AWE appears to assert that the closure of the Antrim II docket is appropriate because closure would be more convenient to AWE. The Petitioners, to the contrary, have provided both clear statutory law and case law to support their assertions that the docket in Antrim II case should remain open and be subject to further hearings before the SEC. AWE's Motion should be denied.

E. The Petitioners Have A Legal Right Sufficient To Bring The Petition

28. AWE asserts that the Petitioners have not sufficiently demonstrated a "particularized legal right" that entitles them to the relief requested in the Petition. AWE asserts that the Petitioners have only asserted a "broad public interest."

⁴ AWE attempts to distinguish <u>Sklar Realty v. Merrimack</u>, 125 N.H. 321 (1984) by asserting that <u>Sklar only</u> involved an interim step, that the Certificate here is a final determination, and, therefore, there is no further right of public participation. For one, AWE provides no support for its proposition that because the Certificate has been issued there is no further right for public involvement in matters of compliance. Additionally, just like in <u>Sklar</u> the issue that precipitated the Petition here is a matter involving a pre-construction activity.

AWE also attempts to distinguish <u>Sklar</u> by asserting that the Petitioners here have an alternative remedy under Site 302.01(a) because they can present complaints to the SEC. AWE ignores that the complaint procedure in Site 302.01 cannot be treated as a substitution for the Petitioners procedural rights established under RSA chapter 541-A. The Petitioners have a right to safeguard their health and safety through ensuring AWE's compliance in the Certificate; these rights cannot be truncated in the manner AWE suggests.

AWE further attempts to distinguish <u>Sklar</u> by asserting that unlike in <u>Sklar</u> "an SEC Certificate does not only have conditions involving pre-construction activity." However, contrary to AWE's assertion, <u>Sklar</u> involved an approval that had post-construction conditions. <u>Sklar</u>, 125 N.H. at 324. The Supreme Court still ruled as it did in <u>Sklar</u>. <u>Id</u>.

⁵ The Petitioners' support also includes citations to prior instances in which the SEC adjudicated matters associated with compliance in the same docket as the SEC considered an application. <u>Application of Groton Wind, LLC for a Certificate of Site and Facility of a Renewable Energy Facility in Groton, N.H.</u>, Docket No. 2010-01 ("<u>Groton Wind</u>"). AWE states that <u>Groton Wind</u> is different because a Motion to Reopen was filed, but that the SEC does not have an "obligation to take up and adjudicate every complaint that comes before it."

AWE elevates form over substance. AWE's argument ignores that the procedural circumstances presented in Groton Wind are nearly identical to those at issue in this matter. AWE presented materials that were contrary to its representations. Counsel for the Public and Intervenors asked the SEC to schedule hearings to address AWE's conflicting representations. Whereas, the SEC treated a similar request in Groton Wind in the same docket, the SEC here declined to consider the Counsel for the Public and the Intervenors' requests for relief on the sole basis that the docket was closed and the relief sought was procedurally improper.

- 29. The SEC should reject AWE's argument because the Petitioners include dozens of individuals that reside in or around the Project area. These include individuals that live on Gregg Lake as demonstrated by the numerous individuals that live on White Birch Point, Gregg Lake Road, and Rachel Lane whose viewsheds will be directly affected by the Project.

 See Exhibit 1 to the Petition.
- The Petitioners also include 11 individuals who were granted intervenor status in the Antrim II docket (not to mention the three other dockets associated with the Project) who the SEC found sufficient interests to merit intervention in this matter. Those intervenors include Bruce and Barbara Berwick, Brenda and Mark Schaefer, and Janice Longgood, about whom the SEC stated that "[t]here is no issue related to the provisions of RSA 162-H, that any residential abutter should be prohibited from addressing." The Petitioners also include Richard Block, Annie Law, Robert Cleland, Ken Henniger, and Jill Fish, to whose intervention AWE did not object. The Petitioners also include the Stoddard Conservation Commission who the SEC stated "demonstrated a substantial interest in the proceedings."
- The Petitioners are individuals who are committed to safeguarding their interests and are committed to ensuring that AWE complies with the Certificate, including AWE's prior representations to the Committee. The only way for the Petitioners to safeguard their interests is to ensure that they will be able to effectively and meaningfully participate in matters pertaining to certificate compliance. This includes ensuring proper funding and oversight for the Project (which the financing condition implicates) and ensuring that the Project is owned by a qualified operator. It also includes ensuring that there is an expeditious, effective, and meaningful procedure through which to raise and actively participate in matters involving AWE's compliance, particularly with regard to matters that implicate the Petitioners' health and safety,

issues associated with noise and shadow flicker. In short, the relief sought in the Petition directly implicates the legal rights of the Petitioners.⁶

- F. The Decision To Finance the Project With Full Equity Is A Material Change And Violates The Certificate.
- AWE asserts that AWE has complied with the terms of the Certificate and that the decision to fund the Project with 100% is equity is consistent with the terms of the Certificate. The Petitioners disagree with AWE's assertions for the reasons set forth in the Petition, which are hereby incorporated by reference.
 - G. Suspension Of The Certificate Is Procedurally Proper.
- Suspension is proper under these circumstances and naturally flows from the relief sought by the Petitioners. The Petitioners assert that the financing condition has not been satisfied and that further developments, namely the publicly announced sale of the Project to TransAlta, heighten the significance of AWE's full-equity proposal. If, as part of the SEC's consideration of the Petition, the SEC determines that the letters should have been reviewed as to their sufficiency and that the financing condition has yet to be satisfied or that the TransAlta transaction merits immediate review of the sufficiency of AWE's full-equity proposal, then suspension would be procedurally proper.

III. CONCLUSION

⁶ With regard to AWE's suggestion that the Petitioners have raised hypothetical concerns, the Petitioners disagree. The Petitioners have pointed to clear instances in the record wherein AWE has made representations to the SEC and then, after obtaining the Certificate, decided on a course of action contrary to those representations. The SEC's administrator did not act solely as a recipient of documents but determined, over the objection of Counsel for the Public and the Intervenors, that AWE satisfied the condition in the Certificate. To date, the SEC has not made any express statements or finding as to AWE's compliance with the Certificate. The Petitioners sought relief from the SEC and were denied on the basis that the docket was "closed."

In light of this history, the Petitioners have shown that, not only has the situation that the Petitioners decried not hypothetical, the situation actually happened.

⁷ Contrary to AWE's suggestion, the Supreme Court has not yet addressed the propriety of suspending the Certificate in light of the issues presented with the financing contingency.

34. The SEC should deny AWE's Motion to Dismiss for each of the reasons set forth above. A petition for declaratory ruling, per the statements of the SEC's chairperson, is a procedurally proper vehicle through which to seek the relief sought in the Petitioner. The Petitioners have not waived the arguments set forth in the Petition, and the Petitioners have not misread or miscomprehended the provisions of the Certificate or applicable laws.

35. The Petitioners have a significant, identifiable interest with regard to the relief sought as abutters and individuals to be directly impacted by the Project.

WHEREFORE, the Petitioners respectfully request that the Subcommittee:

A. Deny AWE's Motion to Dismiss; and

B. Grant such further relief as is just and equitable.

Dated this 4th day of May, 2018

Respectfully submitted,

The Petitioners identified in Exhibit A By and through their attorneys,

DONAHUE, TUCKER & CIANDELLA, PLLC

/s/ Eric A. Maher

Eric A. Maher NHBA # 21185 PO Box 630 Exeter, NH 03833 (603)778-0686 emaher@dtclawyers.com

Certificate of Service

I hereby certify that I served a copy of this Pleading pursuant to Site 202.07 to the current service list in this Docket this 4th day of May, 2018.

/s/ Eric A. Maher Eric A. Maher, Esq.

EXHIBIT 1

Consent to sign Antrim Wind SEC Petition

Name	Address	City	State
Rep. Vincent Paul Migliore	198 Whittemore Point Road South	Bristol	NH
Sue Ozkan	360 Matthews Rd	Alexandria	NH
Susan Hunt	46 Solar Acres Rd	Alexandria	NH
Thomas A. Goltz	1247 Washburn Rd	Alexandria	NH
Mary Allen	21 Summer Street	Antrim	NH
Bruce and Barbara Berwick	72 Reed Carr Rd.	Antrim	NH
Richard Block	63 Loveren Mill Rd.	Antrim	NH
Norman H. Brown	21 Rachel Lane	Antrim	NH
H. Haig Brown	21 Rachel Lane	Antrim	NH
Robert Cleland	43 Farmstead Rd.	Antrim	NH
Victor Daloia	48 White Birch Point Rd.	Antrim	NH
Lisa "Lee" DerHagopian	48 White Birch Point Rd.	Antrim	NH
Dr. Richard Ellis	49 White Birch Point Rd.	Antrim	NH
Sarah Ellis	49 White Birch Point Rd.	Antrim	NH
Eleanor R.Franco	66 White Birch Point	Antrim	NH
Vincent J. Franco	66 White Birch Point	Antrim	NH
Marshall W. Gale	286 Keene Rd.	Antrim	NH
Barbara Gard	243 Pleasant St.	Antrim	NH
Hon. Nancy Gertner	23 Rachel Ln.	Antrim	NH
Sarah J. Gorman	286 Keene Rd.	Antrim	NH
William D. Hamilton	38 White Birch Point	Antrim	NH
Joann B. Kloss	29 White Birch Point	Antrim	NH
Walter J. Kloss	29 White Birch Point	Antrim	NH
Nancy Knowles	75 Bridle Rd.	Antrim	NH
Annie Law	43 Farmstead Rd.	Antrim	NH
Jeffrey Linton	157 Mt. Side Drive	Antrim	NH
Janice Longgood	156 Salmon Brook Rd.	Antrim	NH
Jonathan Lurie	12 White Birch Point Rd.	Antrim	NH
Janice R. Mellen	4 Craig Rd.	Antrim	NH
David Osler	175 Gregg Lake Rd.	Antrim	NH
Martha Osler	175 Gregg Lake Rd.	Antrim	NH
John Reinstein	23 Rachel Ln.	Antrim	NH
Daniel C. Robinson	4 Craig Rd.	Antrim	NH
Gary M. Robinson	5 Brimstone Corner	Antrim	NH
Steven E. Robinson	4 Craig Rd.	Antrim	NH
Mark and Brenda Schaefer	128 Salmon Brook Rd.	Antrim	NH
Willa Schell	21 Rachel Lane	Antrim	NH
Jerome J. Schultz	15 Rachel Lane	Antrim	NH
Marlene B. Schultz	15 Rachel Lane	Antrim	NH
Earle Shumway	187 Gregg Lake Rd.	Antrim	NH
Jeanne Shumway	187 Gregg Lake Rd.	Antrim	NH
Robert Southall	25 White Birch Point	Antrim	NH
Linda Southall	25 White Birch Point	Antrim	NH
Charlene Stephens	44 White Birch Point	Antrim	NH

Frank Wallace	75 Bridle Rd.	Antrim	NH
Paul Youngquist	22 Highland Ave.	Antrim	NH
Jeanne M. Baker	195 Gregg Lake Rd.	Antrim	NH
Carol S. Carnes	195 Gregg Lake Rd.	Antrim	NH
Carol and John White	114 Ledgewood Terrace	Bridgewater	NH
Chris and Halle Neeb	185 Shore Drive North	Bridgewater	NH
David Carlson	47 Abenaki Lane	Bridgewater	NH
Dennis and Linda Cashman	114 Shore Drive South	Bridgewater	NH
Jane L. Hart	44 Mohawk Trail	Bridgewater	NH
John Karen	58 Shore Drive Rd	Bridgewater	NH
John O. Byrne	215 Tomahawk Trail	Bridgewater	NH
Joseph R. Wilkas	46 Shore Drive South	Bridgewater	NH
June Hatfield	79 Pasquaney Lane	Bridgewater	NH
Lori and Jim Lerner	43 Cottage City Rd	Bridgewater	NH
Peter and Sharon Devine	147 Tomahawk Trail	Bridgewater	NH
Peter Silbermann	167 Tomahawk Trail	Bridgewater	NH
Richard Lawrence	41 Abenaki Lane	Bridgewater	NH
Rosamond Carlson	47 Abenaki Lane	Bridgewater	NH
William Weidman	162 Ridge View Dr	Bridgewater	NH
Mary Schneider	31 Pinker Rd	Bridgewater	NH
James Salvucci	24 Wildwood Avenue	Bristol	NH
Leslie Sanderson	66A Windy Ridge Road	Bristol	NH
Mark and Patrice Sullivan	979 West Shore Rd	Bristol	NH
Becca Boudreau	36 Pikes Point Rd	Bristol	NH
Betsy Schneider	36 Pikes Point Rd	Bristol	NH
Alix Olson	148 Jerusalem Rd.	Canaan	NH
Janet Renaud	89 Gould Hill	Greenfield	NH
Fred Kohout	Mayhew Turnpike	Hebron	NH
Gerald Lauther	11 Indian Point Rd	Hebron	NH
Ileana Saros	11 Indian Point Rd	Hebron	NH
Ivan and Barbara Quinchia	33 Pickering Lane	Hebron	NH
Larry and Deborah Goodman	PO Box 310	Hebron	NH
Mary-Jo Monusky	41 North Shore Rd	Hebron	NH
Peter Carey	41 North Shore Rd	Hebron	NH
William Everett	37 Hillside Drive	Hebron	NH
Stuart Miesfeldt	706 Murray Hill Rd	Hill	NH
Donna Ohanian	4 Roy Drive	Hudson	NH
Patricia Kellogg	320 Manns Hill Rd	Littleton	NH
Emily Foley	103 Gilcreast Rd	Londonderry	NH
Durward John "Woody" Miller, Jr.	45 Chaddarin Lane	Plymouth	NH
David Ecklein	66 Cutting Gregory Heights	Rumney	NH
Jim Buttolph	170 Quincy Rd	Rumney	NH
Rick Samson - Coos County Cmr	804 Piper Hill Rd	Stewartstown	NH
Jill Fish	655 Rt. 123 So.	Stoddard	NH
Keneth Henninger	655 Rt. 123 So.	Stoddard	NH
Stoddard Conservation Commission	1 Old Antrim Rd	Stoddard	NH
The WindAction Group	286 Parker Hill Road	Lyman	NH
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Rep. Duane Brown1199 Mt. Moosilauke HwyWentworthJanice McGrory39 Oak St.HarwichTed McGrory39 Oak St.Harwich

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