Revel by Administrator via C-mail on 10/6/2019 CB:12p.m. PG

### STATE OF NEW HAMPSHIRE SITE EVALUATION COMMITTEE

RE: Antrim Level, LLC Petition for Declaratory Ruling or, in the Alternative, Motion for Expedited Approval of Change in Ownership Structure SEC Docket Number 2019-03

#### **MOTION TO INTERVENE OF RICHARD BLOCK**

Pursuant to New Hampshire Site Evaluation Committee Rules Site 202.11 and RSA 541-A:32, Richard Block hereby moves for permission to intervene in the above-referenced proceeding. In support of his Motion to Intervene, Richard Block offers the following arguments:

### **1.)** Richard Block can demonstrate a substantial interest which may be affected by the outcome of the proceeding.

Richard Block has been a resident and voter of Antrim since 1988. He owns and resides on approximately 242 acres of property on Loveren Mill Road, from one-half to one-and-a-half miles from and directly facing and in full view of Tuttle Hill, the site of the Antrim Wind Energy, LLC turbines. Concern for the potential noise, visual disturbance, and negative effect on his property value has caused Richard Block to actively participate and oppose this proposed project from the beginning, as a litigant and intervenor in several Superior Court cases against the Town of Antrim and as an approved Intervenor and Committee-designated spokesperson in all prior SEC proceedings relating to Antrim Wind Energy, LLC (Dockets 2011-02, 2012-01, 2014-05, 2015-02, and 2018-03).

## 2.) The interest of Richard Block will not be adequately protected by other parties.

In exercising its discretion, Richard Block respectfully asks that the Committee consider whether his interests will be adequately protected by other parties. Since he, as a resident of the North Branch region of Antrim where the wind facility is being constructed, is concerned that his interests have not been fairly addressed thus far by the Town Boards of Antrim, he does not believe that any other party to this proceeding can adequately represent his interests in proceedings before the Committee.

# 3.) The intervention of Richard Block will be in the interest of justice and will not impair the orderly and prompt conduct of the proceedings by allowing the intervention.

Richard Block petitioned for and was granted Intervenor status in Antrim Wind Energy, LLC's prior cases before the Committee (SEC Dockets 2011-02, 2012-01, 2015-02, and 2018-03), served in those hearings as the spokesperson for the non-abutting group of Intervenors, and thus understands and respects the hearing process.

Pursuant to the SEC Order of September 25, 2019, Richard Block files this Motion to Intervene by the deadline set forth by the Committee for Docket 2019-03 and requests that he be permitted to intervene with full standing to participate in all phases and activities of the proceeding. Richard Block respects the importance of conducting this proceeding in an orderly manner that will not unduly delay the Committee nor the parties in reaching an outcome. He is prepared to work closely with other parties to the proceeding in the interest of maintaining order and respectfully offers that his participation, if permitted, would be in the interest of justice.

Dated this 2<sup>nd</sup> day of October, 2019.

Respectfully submitted,

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