

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

_____)	
RE: Application of Granite Reliable)	
Power, LLC for Certificate of site and)	Docket No. 2008-04
facility to construct up to 99 MW of wind)	
electric generation in Coos County,)	
New Hampshire and operate the same)	
_____)	

**OBJECTION OF COUNSEL FOR THE PUBLIC
TO ADMISSION OF APPLICANT’S EXHIBIT 56**

Counsel for the Public, Senior Assistant Attorney General Peter C.L. Roth (“Counsel For the Public”), by his attorneys, the Office of the Attorney General, hereby objects to the Applicant’s admission into evidence of Exhibit 56 to the Supplement to the Application. In support hereof, Counsel for the Public respectfully represents as follows:

1. On February 24, 2009, two weeks before the hearing on this project, the Applicant submitted its Supplemental Volume 6 to the Application. Volume 6 included 23 additional exhibits, presumably for inclusion in the Application that had already been deemed “sufficient.” See Order dated, August 14, 2008.
2. Among the supplemental exhibits is No. 56, entitled “Economic Impact of Granite Reliable Power Wind Power Project in Coos County, New Hampshire,” authored by Ross Gittell and Matt Magnusson and dated, February 2009 (the “Economic Impact Paper”).
3. The only reference to the Economic Impact Paper is in the Supplemental testimony of Mark Lyons and Pip Decker who testified that they

believe that Project would have a positive impact but “we decided that it would be useful to further quantify that impact.”

4. There is no testimony submitted by the authors of the Economic Impact Paper and it is not expected that there will be any opportunity by the parties to conduct discovery on the statements and conclusions made in the Economic Impact Paper or to cross-examine the authors of that paper.

5. Allowing the submission of the Economic Impact Paper would deny the parties due process. Its admission as evidence should be denied.

Respectfully submitted this 6th day of March, 2009,

PETER C.L. ROTH
COUNSEL TO THE PUBLIC

By his attorneys

KELLY A. AYOTTE
ATTORNEY GENERAL

/s/ Peter C.L. Roth
Peter C.L. Roth
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Certificate of Service

I, Peter C.L. Roth, do hereby certify that I caused the foregoing to be served by electronic mail on each of the parties on the Service List.

Dated: March 6, 2009

/s/ Peter C.L. Roth
Peter C.L. Roth