
EXHIBIT D

APPLICANT'S ORGANIZATION, MANAGERIAL, AND TECHNICAL EXPERTISE

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Introduction

This exhibit addresses OAR 345-021-0010(1)(d) and provides information about the organizational experience of the Applicant to construct and operate the proposed Facility and provides evidence to support a finding by the EFSC as required by OAR 345-022-0010.

D.1 Applicant's Previous Experience

OAR 345-021-0010(1)(d)(A) *The applicant's previous experience, if any, in constructing and operating similar facilities;*

RESPONSE

Baseline Wind, LLC (Applicant) is owned by First Wind Oregon Holdings, LLC, a wholly owned subsidiary of First Wind Holdings, LLC, the parent of the First Wind group of companies. First Wind Holdings, LLC is an independent North American wind energy company focused on the development, ownership, and operation of wind farms. The Applicant does not have previous experience as it was formed as an LLC specifically for this project; however, First Wind Holdings, LLC has a long history of developing and operating wind projects in the northeastern and western regions of the U.S., including Hawaii.

First Wind Holdings, LLC is a U.S.-owned company founded in 2002. With headquarters in Boston, Massachusetts, First Wind Holdings, LLC's core development areas are located in the northeast, west, and Hawaii. First Wind Holdings, LLC's project experience began with the Kaheawa Wind Power I project, which became operational in 2006. Currently, First Wind Holdings, LLC has an operating portfolio of 11 projects, with a net production capacity of 735 MW. Successful development of projects is due, in large part, to First Wind Holdings, LLC's integrated capabilities, including project development, engineering and construction, and operations. First Wind Holdings, LLC has experience with siting and permitting projects across the U.S., including working with local, state, and federal governments in Hawaii (HI), Utah (UT), Washington (WA), New York (NY), Vermont (VT), and Maine (ME). Several of the projects that have been sited and permitted by First Wind Holdings, LLC included challenging aspects, such as the first wind project constructed on an EPA brownfield site in the U.S. (Steel Winds, Lackawanna, NY), the first project permitted under the Bureau of Land Management's (BLM's) 2005 Programmatic EIS (Milford Wind I and II, Fillmore, UT), and the first wind projects project that acquired a Habitat Conservation Plan (HCP) under Section 10 of the ESA in the U.S. (Kaheawa Wind Power, Hawaii).

Table D1 presents First Wind Holdings, LLC assets that are operational, or currently under construction (and planned to be operational by 2012).

Table D1: First Wind Holdings, LLC Project Portfolio

Project Name	Location	Control Structure	Capacity (MW)	Status
Milford Wind	Utah	Own	204	Operating
Milford Wind II	Utah	Own	102	Operating
Kaheawa Wind	Hawaii	Own	30	Operating
Kahuku Wind	Hawaii	Own	30	Operating
Kahuku Wind II	Hawaii	Own	21	Construction
Sheffield Wind	Vermont	Own	40	Operating
Mars Hill Wind	Maine	Own	42	Operating

Table D1: First Wind Holdings, LLC Project Portfolio

Project Name	Location	Control Structure	Capacity (MW)	Status
Stetson Wind	Maine	Own	57	Operating
Stetson Wind II	Maine	Own	26	Operating
Rollins Wind	Maine	Own	60	Operating
Cohocton Wind	New York	Own	125	Operating
Steel Winds	New York	Own	20	Operating
Steel Winds II	New York	Own	15	Construction
Palouse Wind	Washington	Own	110	Construction
Total			872	

First Wind Holdings, LLC is also actively developing additional projects in all of the states listed above, as well as California, Arizona, Nevada, New Mexico, and Oregon.

D.2 Qualifications of Applicant's Personnel

OAR 345-021-0010(I)(d)(B) *The qualifications of the applicant's personnel who will be responsible for constructing and operating the facility, to the extent that the identities of such personnel are known when the application is submitted;*

D.2.1 General Qualifications

RESPONSE

First Wind Holdings, LLC develops projects with the perspective of long-term operation and ownership.

First Wind Holdings, LLC has built a company around the integrated capabilities needed to successfully develop, construct, and operate projects. As a result of this fundamental approach, First Wind Holdings, LLC is able to bring a depth and breadth of experience to all phases of project development. During project development, First Wind Holdings, LLC incorporates best practices from day one to ensure that all projects are developed efficiently and successfully. First Wind Holdings, LLC also believes that long-term commitments built on strong relationships will foster constructive community involvement during project development and the public engagement process.

First Wind Holdings, LLC draws upon the resources of its extensive wind resource analysis, site assessment, and permitting staff; its experience in energy development origination and financing; and its experience with stakeholder outreach during all phases of project development to ensure efficient and inclusive project development.

First Wind Holdings, LLC's environmental group oversees all environmental permitting and compliance efforts. The group consists of a team of staff experts that oversee outside consultants covering a variety of disciplines including, but not limited to avian species, cultural resources, endangered flora and fauna, and sound evaluation. At the time of construction, a dedicated construction environmental monitor is also hired, reporting directly to First Wind Holdings, LLC's Environmental Affairs Department, to ensure the project is constructed in accordance with the requirements of applicable permits and approvals.

First Wind Holdings, LLC's experienced transmission group leads the company's transmission efforts from assisting with prospecting for potential development sites to working with utilities around the country to interconnect individual projects.

First Wind Holdings, LLC has a very experienced team of financial professionals with a strong record of being successful at obtaining financing for its projects. Since 2004, First Wind Holdings, LLC has raised over \$5 billion and, since the beginning of 2009, First Wind Holdings, LLC has refinanced, raised, or received approximately \$2.6 billion in more than 25 refinancing and capital raise activities and customer prepayments. These activities include project debt financings, tax equity, corporate financings, government grants, and customer prepayments.

During the construction phase of its projects, First Wind Holdings, LLC draws on the experience of its site design, planning, project management, and construction and compliance team to ensure compliant, on-time, and on-budget projects. First Wind Holdings, LLC has an in-house group of engineering and construction personnel who oversee and coordinate the activities of a number of outside consultants. These consultants perform a variety of tasks both before and during construction including, but not limited to, geotechnical studies, foundation design, substation and electrical design, equipment transportation services, and engineering, procurement and construction (EPC). An EPC contractor is chosen for each project to manage all aspects of on-site construction as well as some of the engineering and procurement activities. In addition to the EPC contractor, First Wind Holdings, LLC's construction staff is on-site at each project during construction to oversee and coordinate construction activities.

First Wind Holdings, LLC's meteorology group is experienced in all aspects of wind resource assessment from site prospecting, energy analysis, and turbine micro-siting to analysis of operating plants. The meteorology group is composed of meteorologists, engineers, and a GIS analyst with expertise in the latest standards and modeling techniques. First Wind Holdings, LLC also has an in-house team to install and service meteorological towers and sonic detection and ranging units. Having its own team to service its data gathering efforts allows First Wind Holdings, LLC to respond rapidly if maintenance is required and keep a consistent and adequate standard on all wind resource assessment campaigns.

First Wind Holdings, LLC continues to own and operate its projects after commercial operation and, as such, has a staff of on-site and off-site professionals who manage the day-to-day O&M as well as overall asset management of the projects. First Wind Holdings, LLC's O&M philosophy places a high value on hands-on operational control, helping assure that its wind farms are well-run and safe, consistent with utility operating practices, providing excellent clean energy availability for its customers. Currently, First Wind Holdings, LLC assigns a full-time Operations Manager for each project supported by an additional individual dedicated to site management. Working together, First Wind Holdings, LLC's on-site staff manages all third party contracted turbine O&M services, oversees local community involvement activities, and ensures permit compliance. Contract compliance, project reporting, and procurement functions for all operating projects are supported by a team of operating and finance managers.

During operation, First Wind Holdings, LLC's wind farms are centrally managed and power generation is tracked at its Data Analysis Control Center (DACC). The DACC is First Wind Holdings, LLC's national remote monitoring and control system, located in Boston, MA. The

DACC also includes backup monitoring and control capabilities located in Temecula, California (CA).

The following section contains brief resumes of key First Wind Holdings, LLC's personnel responsible for the development, and future construction and operation of the Facility.

D.2.1.1 Executive Management

Paul Gaynor has served as First Wind Holdings, LLC's Chief Executive Officer since 2004 and served as President from 2004 until 2009. Mr. Gaynor has also served as a member of the Board of Directors since 2008. Prior to joining First Wind Holdings, LLC in 2004, Mr. Gaynor served as chief financial officer of Noble Power Assets, LLC, a private equity backed power plant acquisition company from May 2003 to April 2004. Between September 2002 and April 2003, he held concurrent positions with the Singapore Power Group: (i) Senior Vice President and Chief Development Officer of the Singapore Power Group and (ii) Chief Operating Officer of Singapore Power International, an unregulated international subsidiary. In August 2000, he joined the Singapore Power Group as Senior Vice President and Chief Financial Officer, where he was responsible for all financial matters of the company. Between 1998 and 2000, Mr. Gaynor worked for PSG International in London, a joint venture of GE Capital and Bechtel Enterprises as Senior Vice President and Chief Financial Officer. Prior to that, Mr. Gaynor worked for GE Capital and GE Power Systems for nearly 10 years in a variety of positions. Mr. Gaynor serves on the Board of Managers of Deepwater Wind Holdings, LLC, an affiliate of First Wind Holdings, LLC. Mr. Gaynor has a B.S. from Worcester Polytechnic Institute and an M.B.A. from the University of Chicago.

Michael Alvarez has served as the President and Chief Financial Officer since 2009, following service as Executive Vice President from 2006 to 2009, and as Chief Operating Officer from 2006 to May 2010. Prior to joining First Wind Holdings, LLC, Mr. Alvarez served as the vice president of strategic planning of Edison International from 2005 to 2006. Prior to that, he served as executive vice president, chief financial officer, and general counsel of Nexant, Inc., a privately held San Francisco based company that provides software and advisory services to the global energy industry, from 2000 to 2006. Before Nexant, Mr. Alvarez was employed by PSG International in London, where he managed the development of the \$2.3 billion, 1,700-kilometer TransCaspian natural gas pipeline. Before PSG International, Mr. Alvarez was president of Kenetech Energy Systems, the project development subsidiary of Kenetech Corporation, a developer of environmentally-preferred electric power plants, principally wind, biomass, and natural gas. Mr. Alvarez serves on the Board of Managers of Deepwater Wind Holdings, LLC, an affiliate of First Wind Holdings, LLC, and as a Trustee of the California State Parks Foundation. Mr. Alvarez has a B.A. in economics and a J.D. from the University of Virginia.

Kurt Adams has served as First Wind Holdings, LLC's Executive Vice President and Chief Development Officer since October 2008, and before that, served as the Senior Vice President of Transmission from May to October, 2008. Prior to joining First Wind Holdings, LLC in May 2008, Mr. Adams served as the Chairman of the Maine Public Utilities Commission from 2005 to 2008. While Chairman, Mr. Adams served as a member of the New England Conference of Public Utilities Commissions, the National Association of Regulatory Utility Commissions (NARUC), the NARUC Electricity Committee, the NARUC Competitive Procurement Committee, and as Maine's representative on the New England State Committee on Electricity. Prior to serving as the Chairman of the Maine Public Utility Commission, Mr. Adams was Governor John Baldacci's Chief Legal Counsel from 2003 to

2005. Prior to that, Mr. Adams was the Vice Chairman of the Energy Practice Group at the law firm of Bernstein, Shur, Sawyer & Nelson in Portland, Maine. Mr. Adams has a B.A. in government from Skidmore College, an M.A. in International Affairs from George Washington University and a J.D. from the University of Maine Law School.

D.2.1.2 Project Development

Kelly O'Brien oversees all development activities for First Wind Holdings, LLC's projects in its Hawaii and West regions. Ms. O'Brien joined First Wind Holdings, LLC as Vice President of Business Development in Hawaii in July 2009. She has over 19 years experience in the energy industry. She began her career in natural gas and capacity trading and supply optimization working for the third largest shipper on the Florida Gas Transmission pipeline system. From there, Ms. O'Brien moved to the supply side as a Manager of Gas Origination for Duke Energy Trading and Marketing. In 1997, she joined Duke's fledgling development group and spent the next six years developing natural gas-fired power plant projects throughout the United States and was responsible for nearly \$2 billion in projects that came on-line in 2001 and 2002. In 2005, Ms. O'Brien joined FPL Energy's wind team, developing projects in several states, including a 99-MW wind farm in Minnesota that reached commercial operation in the fourth quarter of 2006. Before taking her current position at First Wind Holdings, LLC, she worked at BP Alternative Energy for three years as the Director of Wind Power Development in the western region. Ms. O'Brien holds a B.S. in Business Administration from the University of Florida.

Ben Fairbanks joined First Wind in 2007 and is currently the Director for wind project development in the Northwest. Mr. Fairbanks is responsible for managing wind energy project development, from initial site prospecting/evaluation, through financial close and the start of construction. Mr. Fairbanks and his team have developed a pipeline of over 1,000 MW and will commence construction on First Wind's first project in the Northwest this summer. Prior to joining First Wind, Mr. Fairbanks worked with Tetra Tech, Inc. managing environmental and engineering tasks for energy projects in the mid- and western U.S. During this time Mr. Fairbanks managed, reviewed, and/or contributed to the development of over fifty wind energy projects. Mr. Fairbanks has a Bachelors of Science in Environmental Science from Western Washington University's Huxley College.

Ryland Moore has served as the Northwest Region's Business Development Manager for First Wind since 2010. Mr. Moore focuses on land leases and acquisitions, meteorological tower campaigns, wind project prospecting, assisting the environmental permitting process, public relations and landowner outreach, preconstruction efforts, including obtaining building permits, site preparation, and coordination between general contractors and subcontractors. Mr. Moore has over 10 years of experience in land and water right acquisition projects, with a focus on agricultural lands throughout Oregon, Washington, Idaho, and northern California. Mr. Moore earned his Master's in Community and Regional Planning from the University of Oregon and his B.S. in Natural Resources with a concentration in Economics from the University of the South in Sewanee, Tennessee.

D.2.1.3 Environmental Permitting

Dave Cowan oversees the Environmental Affairs group at First Wind Holdings, LLC. He is responsible for all aspects of environmental permitting and compliance for projects throughout the United States. He routinely advises the President and CEO on permitting risks and secures documentation for financing. As the Senior Environmental Permitting

Executive at First Wind Holdings, LLC, Mr. Cowan oversees permit compliance on projects totaling more than 500 MW and currently operating in Maine, New York, Utah and Hawaii, with several hundred MW of additional projects currently under development around the U.S. He oversaw development of the first HCP to benefit endangered species for a wind energy project in the U.S. (Maui's Kaheawa Wind project). Mr. Cowan represents First Wind Holdings, LLC before environmental and energy siting boards, and participates in regional and national environmental forums on behalf of the industry, actively shaping environmental regulations and wind power policy. Mr. Cowan began working for First Wind Holdings, LLC in 2004, when the company was under the name UPC Wind Management, LLC. Prior to that, he served as Senior Environmental Specialist for Devine Tarbell & Associates from 1993 – 2004. From 1987 – 1993, Mr. Cowan served as a Research Associate for Normandeau Associates, Inc. Lastly, from 1984 – 1986, he was a Research Associate with the Cornell Laboratory of Ornithology. Mr. Cowan holds a Masters Degree in Marine Science from the State University of New York at Stony Brook, and a Bachelor of Science in Wildlife Biology from the State University of New York College of Environmental Sciences and Forestry. He is a Certified Wildlife Biologist (The Wildlife Society) and a Professional Wetland Scientist (Society of Wetland Scientists).

Irina Makarow leads permitting efforts for First Wind Holdings, LLC's projects throughout the western mainland United States. Irina has been providing environmental permitting services to consulting firms, state governments, and private industry for over 24 years, with the last 12 years focused on energy generation. She has acquired permits for all types of media (water, air, land use, wetlands) at all levels of local, state and federal government, and has a strong background in federal consultations under the Endangered Species Act (ESA), Section 106 of the National Historic Preservation Act, and the National Environmental Policy Act. Ms. Makarow holds Bachelor of Engineering and Masters of Engineering Degrees in Metallurgical Engineering from McGill University (Canada).

D.2.1.4 Meteorology

Mohit Dua leads First Wind Holdings, LLC's Wind Resource Group. Since joining First Wind Holdings, LLC in 2005, Mr. Dua has been responsible for developing the group's standards, analysis methodologies, and modeling techniques. Before working at First Wind Holdings, LLC, he was conducting research at the Wind Energy Center in the University of Massachusetts, Amherst, where he also obtained an M.S. in Mechanical Engineering with specialization in renewable energy. Prior to that, he worked for 4 years in the field of energy efficiency for The Energy and Resources Institute in India. Mr. Dua has an M.S. and B.E. in Mechanical Engineering.

D.2.1.5 Transmission Planning and Interconnection

Tom Siegel, Vice President of Transmission for First Wind Holdings, LLC, is responsible for all aspects of interconnecting and integrating wind projects into utility grids throughout the U.S. Tom has over 21 years of experience at First Wind Holdings, LLC, Pacific Gas & Electric, the California ISO, and PECO Energy, mostly in the areas of Transmission Planning, Transmission Operations, and Energy Market Compliance.

D.2.1.6 Construction Management and Engineering

Jed Dailey leads First Wind Holdings, LLC's Wind Construction Department in the West (including Hawaii). Prior to joining First Wind Holdings, LLC in 2007, Mr. Dailey worked for

eight years in a project management role for M.A. Mortenson Company, a general contractor in the renewable energy sector. Four of these years were spent in M.A. Mortenson's Energy Group, which was focused solely on wind energy design and construction. Mr. Dailey was the Project Manager for M.A. Mortenson on the Kaheawa Wind Project I Facility (First Wind Holdings, LLC's first wind energy project). Two years later, he joined First Wind Holdings, LLC to lead the construction efforts. Since joining First Wind Holdings, LLC, he has successfully managed and constructed First Wind Holdings, LLC's Stetson project, Milford 2 project, Kahuku Wind Project, and is managing our 2011 and 2012 pipeline in the West. Since starting in the wind industry, Mr. Dailey has directly managed and constructed projects in aggregate of more than 500 MW and brings a wealth of engineering, construction, and logistics experience to our renewable project development and construction team.

D.2.1.7 Origination

Mark Klein is an energy professional with strong technical and broad commercial abilities gained from 24 years experience in the oil, gas, electric, and metals' industries. Over a 12-year span, he has previously served as Vice President of Electricity Trading with two major west coast utilities. Mr. Klein has extensive knowledge of the western U.S. electricity, natural gas, renewable energy, and coal markets, and has international experience both commercially (coal, renewable generation, and emission trading in the United Kingdom) and in energy trading and risk management. In his current role, Mr. Klein directs the origination activities for First Wind Holdings, LLC's renewable projects in the eastern and western United States.

D.2.1.8 Operations, Maintenance, and Asset Management

Steven Chwiecko is the Senior Vice President of Asset Management and Operations for First Wind Holdings, LLC. Steven is responsible for overseeing First Wind Holdings, LLC's leases, power sales agreements, Renewable Energy Certificate (REC) sales contracts, and interconnection agreements for current operating wind projects. Mr. Chwiecko has more than 25 years of experience in the unregulated power generation area, focusing on asset management and acquisitions. Prior to joining First Wind Holdings, LLC, Mr. Chwiecko was responsible for Asset Management and Acquisitions for a portfolio of 16 power/transmission projects for Atlantic Power Corporation, one the largest Canadian Power Income Funds. Prior to that, he served at El Paso Merchant Energy where he originated the acquisition of electric generating "qualifying" facilities and executed restructuring of facility-related power purchase agreements. Mr. Chwiecko also served for 12 years as Chief Financial Officer at Adirondack Hydro Development Corporation. He earned a B.S. in Geology from St. Lawrence University and an M.B.A. from Rochester Institute of Technology.

D.2.1.9 Finance and Legal

Arthur Snell has served as Associate General Counsel for Real Estate Development since March 2009. Prior to joining First Wind Holdings, LLC, Mr. Snell was a Senior Associate at Goodwin Procter, LLP practicing in their Real Estate area from 2004 to 2008. Mr. Snell holds a B.S. degree from Bryant College in Business Management and a J.D. from the Boston University School of Law.

Steve Schauer manages all project finance, tax equity, corporate debt capital, and treasury operations for First Wind Holdings, LLC. Mr. Schauer joined First Wind Holdings, LLC in

November 2008, and has over 18 years of experience in the energy and power financing sector. Since joining First Wind Holdings, LLC, he has led the development and execution of a \$376-million construction financing for a 204-MW wind energy project in Milford, UT. Prior to joining First Wind Holdings, LLC, he was the Executive Director of Solar Development for FPL Energy, where he was responsible for development of solar projects in the southwest region of the United States. At FPL Energy, he was also Assistant Treasurer where his team was responsible for raising over \$3.4 billion in financing for 31 wind and solar energy projects over a 6-year period. Prior to joining FPL, Mr. Schauer was Director of Origination, Energy & Shipping Group for BTM Capital, where he was originator for leasing products to the Energy and Power sectors. Steve also worked for 10 years for Bank of America as a Senior Relationship Manager in the Energy & Utilities Division in Boston.

D.3 Qualifications of Known Contractors

OAR 345-021-0010(1)(d)(C) *The qualifications of any architect, engineer, major component vendor, or prime contractor upon whom the applicant will rely in constructing and operating the facility, to the extent that the identities of such persons are known when the application is submitted;*

RESPONSE

D.3.1 Facility Development and Permitting

First Wind Holdings, LLC has assembled an experienced team to develop and permit the Facility, including, but not limited to:

- HDR Engineering, Inc., in cooperation with subconsultant Historical Research Associates, Inc. (HRA), is responsible for completing wetland, wildlife, scenic resource, noise, and archaeological surveys and analyses, as well as developing the Baseline Wind Energy Facility ASC. HDR Engineering, Inc. has demonstrated success in developing and permitting energy projects across the U.S.
- Northwest Wildlife Consultants, Inc. which specializes in Columbia Basin and Great Basin wildlife and botanical surveys, monitoring and environmental permitting for wind power and other energy projects.
- Westwood Land and Energy Development Consultants which is providing preliminary Facility design services. As energy development consultants, Westwood has supported all phases of wind facility development for projects across the country since 1997.

D.3.2 Facility Design

Final design of the Facility will be conducted prior to construction, and will take into account site specific data and constraints, including permitting conditions. First Wind Holdings, LLC has not yet chosen a firm for this task. First Wind Holdings, LLC typically selects a firm that is capable of completing design, procurement, and construction management.

D.3.3 Facility Construction

As noted above, the Applicant has not selected a prime contractor for construction of the proposed Facility, but will hire qualified contractors with direct experience in wind energy facility construction to design and build the proposed Facility. First Wind Holdings, LLC also maintains a dedicated internal construction management team that oversees the construction contractor.

D.4 Applicant's Past Performance

OAR 345-021-0010(1)(d)(D) *The past performance of the applicant, including but not limited to the number and severity of any regulatory citations in constructing or operating a facility, type of equipment, or process similar to the proposed facility;*

RESPONSE

First Wind Holdings, LLC has successfully developed, managed the construction of, and is operating eleven wind energy projects in six states. First Wind Holdings, LLC has experience with constructing projects under the overview of multiple agencies, with permit and approval requirements spanning the full spectrum of regulatory compliance.

A single regulatory citation was issued to Kaheawa Wind Power, a subsidiary of First Wind Holdings, LLC, in connection with the construction of the Kaheawa Pastures Wind Project in 2005. Kaheawa Wind Power, LLC was issued a citation by the Hawaii Department of Land and Natural Resources for construction being conducted outside of disturbance limits. Kaheawa Wind Power paid the associated fine, and since that time, First Wind Holdings LLC uses environmental construction monitors to maintain compliance with regulatory and permit requirements at all of its construction sites.

D.5 Applicant With No Previous Experience

OAR 345-021-0010(1)(d)(E) *If the applicant has no previous experience in constructing or operating similar facilities and has not identified a prime contractor for construction or operation of the proposed facility, other evidence that the applicant can successfully construct and operate the proposed facility. The applicant may include, as evidence, a warranty that it will, through contracts, secure the necessary expertise; and*

RESPONSE

OAR 345-021-0010(1)(d)(E) is not applicable.

D.6 ISO-Certified Program

OAR 345-021-0010(1)(d)(F) *If the applicant has an ISO 9000 or ISO 14000 certified program and proposes to design, construct and operate the facility according to that program, a description of the program;*

RESPONSE

The Applicant does not have an ISO 9000 or ISO 14000 certified program.

D.7 Mitigation

OAR 345-021-0010(1)(d)(G) *If the applicant relies on mitigation to demonstrate compliance with any standards of Division 22 or 24 of this chapter, evidence that the applicant can successfully complete such proposed mitigation, including past experience with other projects and the qualifications and experience of personnel upon whom the applicant will rely, to the extent that the identities of such persons are known at the date of submittal.*

RESPONSE

The Applicant will oversee and ensure that identified mitigation actions are successfully implemented. First Wind Holdings, LLC has successfully developed and implemented mitigation for impacts to wetlands, important wildlife habitat, and other resources on a number of wind projects. The following projects are examples of First Wind Holdings, LLC projects which have included a mitigation component:

D.7.1 Kaheawa Wind Project - Habitat Conservation Plan

The Kaheawa Wind Project was the first operating U.S. wind farm to complete a HCP under the ESA to protect four listed bird species that might be impacted by the project. The HCP also supports the issuance of an Incidental Take License (ITL) in accordance with Chapter 195-D, Hawaii Revised Statutes, issued by the State Department of Land and Natural Resources. Under the HCP, Kaheawa Wind will contribute a minimum of \$1,000,000 to the mitigation efforts, including research activities, to build the knowledge base on the species identified. And, under certain circumstances Kaheawa Wind may also contribute as much as \$3,756,000 over the life of the project to ensure a net benefit to the species.

D.7.2 Kahuku Project - Habitat Conservation Plan

An HCP covering seven listed species was approved for the Kahuku Project in May 2007, and is currently being implemented. It also was developed in support of consultation under the federal ESA and ITL from the Hawaii State Department of Land and Natural Resources. Funding of \$291,500 will be provided for three years of management at Hamakua Marsh to a qualified contractor or personnel approved by the U.S. Fish and Wildlife Service (USFWS) and Hawaii State Department of Land and Natural Resources. Predator trapping and baiting will begin during the first breeding season after permit issuance to remove predators (e.g., cats, rats, mongoose). Predator trapping will be conducted year-round using traps, leg holds, and/or snares. Vegetation maintenance will be conducted to remove and prevent invasive species from encroaching on waterbird nesting habitat and to enhance available nesting habitat where possible. Monitoring of reproductive activity and waterbird populations will quantify the effectiveness of the predator control methods. Monitoring of reproductive activity will be conducted weekly from December through September. For bats, activities include a combination of on-site surveys to add to the knowledge base of the species' status on O'ahu; on-site research into bat interactions with the wind facility; and implementation of bat habitat improvement measures to benefit bats as determined based on the results of ongoing research, in consultation with DLNR, USFWS and Endangered Species Recovery Committee (ESRC).

To ensure the success of the mitigation effort, Kahuku Wind Power will establish a \$100,000 Hawaiian Hoary Bat Contingency Fund.

D.7.3 Rollins Wind – Bald Eagle Management Plan

A post-construction Eagle Conservation Plan was developed and implemented in June 2011 for the Rollins Wind Project. The objectives of the plan are to document injuries and fatalities of birds and bats during project operations and in particular to monitor nesting activity and behavior patterns of bald eagles in the vicinity of the project. Protocols for the plan were developed jointly with the USFWS and Maine Department of Inland Fisheries and Wildlife (MDIFW). Rollins Wind consults regularly with USFWS and MDIFW to review the results of monitoring and to discuss the scope and timing for continued monitoring, modifications to monitoring, and any appropriate mitigation.

D.7.4 Avian and Bat Protection Plans

Since the issuance of the February 2011 USFWS Land-based Wind Energy Guidelines, First Wind Holdings, LLC has been working with USFWS regions to develop Avian and Bat Protection Plans (ABPP) for its projects, even though the USFWS guidance is still in draft form. First Wind Holdings, LLC is actively coordinating the development of ABPPs for its projects in development, construction, and operation in Utah, California, and Oregon. Each ABPP focuses on the site-specific concerns regarding avian and bat species, post-construction surveys, and mitigation measures. Mitigation may include, but is not limited to, post-construction avian fatality monitoring, additional acoustic bat surveys, carcass removal, and vegetation management to deter the presence of prey that can attract avian species. First Wind Holdings, LLC works with experienced consultants to develop, implement, and monitor the various mitigation measures developed for each project, including Northwest Wildlife Consultants, WEST Consultants, CH2M Hill, SWCA Environmental Consultants, Stantec, and LSI.

D.8 Proposed Site Certificate Condition

Similar to the conditions proposed by previously-approved wind energy facilities in the vicinity of the Facility, the Applicant proposes the following condition:

Condition 32

Before beginning construction, the certificate holder shall notify the Department of the identity and qualifications of the major design, engineering, and construction contractor(s) for the Facility. The certificate holder shall select contractors that have substantial experience in the design, engineering and construction of similar facilities. The certificate holder shall report to the Department any change of major contractors.