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Town Board Members
Robert W. Cantwell, III
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Via Electronic Filing

September 20, 2016

Hon. Kathleen H. Burgess, Secretary
New York State Public Service Commission
Empire State Plaza, Agency Building 3
Albany, NY 12223-1350

RE: Case 12-F-0575, Horse Creek Wind Farm Project, Jefferson County, NY

Dear Secretary Burgess:

On behalf of the Clayton Town Board, I am writing to raise concerns about marketing material recently circulated by Avangrid/Iberdrola in advance of their upcoming information session on September 21 in Depauville, NY. A copy of the marketing material is enclosed for your reference.

First the depicted project area map on Page 2 of the marketing material (the "Marketing Map") is misleading and inaccurate. It does not accurately reflect the Project Map outlined in the revised Public Involvement Program document on file with the PSC (the "PIP Map"). The Marketing Map shows an expanded Site Boundary, including the Chaumont Barrens, a protected preserve of rare alvar grasslands and karst limestone bedrock unique to the region. It also includes County Route 179 between Depauville and the Clayton-Lyme town limit, a residential area in the Chaumont River valley. Neither area is included in the Project Area shown on the PIP Map (see Revised Public Involvement Plan, Figures 1 and 2). Should stakeholders presume the project area has expanded, and that the project area shown in the PIP is now inaccurate?

The Marketing Map is also misleading and inaccurate because it is excessively cropped. This cropping obscures the project's proximity to major population centers like the Villages of Clayton and Chaumont. It also conceals the Project's proximity to Lake Ontario and the St. Lawrence River tourism corridor. This obfuscation can only be viewed as an attempt to mislead the public regarding the actual extent of the Project's likely impact area. In reality, the impact area is likely to extend 10 miles from the Site Boundary, at a minimum, including a variety of sensitive environmental, cultural, aesthetic, and economic resource areas.

Second, the statistics presented on Page 2 are dubious at best, and show a total lack of transparency on the part of Avangrid Renewables and Iberdrola. There is no indication of how questions were specifically phrased, no disclosure of what methods were used in selecting poll recipients, no indication of how many survey takers reside within the project area or adjacent impact area, no reported margins of error, and no indication that an outside auditing firm was retained to verify results. Any one of these methodological errors could indicate a biased result. But taken together, these omissions and lack of transparency suggest a knowingly fraudulent misrepresentation regarding the true level of public opposition to the Horse Creek Project. The developer should refrain from publishing statistics without revealing industry-standard authenticity and accuracy methodologies. In the future, the Town of Clayton would be interested in working with the Developer to design a fair and unbiased study, conducted during a time of peak local population, with the goal of obtaining an accurate gauge of public support or opposition to the Project.

We look forward to working with the DPS and the Developer in reviewing this project and protecting the health, safety, and welfare of our community residents. If you have any questions, please feel free to contact me at (315) 686-3512.

On behalf of the Town Board,

A handwritten signature in blue ink that reads "David M. Storandt, Jr." with a stylized flourish at the end.

David M. Storandt, Jr.
Supervisor
Town of Clayton, NY

Avangrid Renewables
7650 North State Street, Suite 1
Lowville, New York 13367



PUBLIC OPEN HOUSE

HORSE CREEK WIND PROJECT
Wednesday, September 21, 2016
2-4 p.m. and 6-8 p.m.

Depauville Fire Department
15231 School St.
Depauville, NY 13632

Please join us at our public open house to learn more about the Horse Creek Wind Project. Attendees can visit several educational stations for more information on the project, permitting and environmental study process, interconnection study process, meteorology studies and engineering and construction. Wind energy experts will be available to answer questions.

We look forward to seeing you there!

For more information, contact 315-874-4231 or HorseCreekWind@avangrid.com.

www.avangridrenewables.us/horsecreek



Working Together

For a Clean Energy Future

Renewable resources like wind energy can lead us to a better and cleaner future, as wind turbines create no air pollution, no water pollution or hazardous emissions and consume no water. That means cleaner air, cleaner water and a cleaner community. Plus, homegrown energy creates local jobs and supports manufacturing in the U.S. By choosing renewable energy today, we can create a better future for our communities.

At Avangrid Renewables, we are proud to be a part of the communities where we live and work. We have a history of successful wind energy partnerships in the

North Country that have brought real economic benefits for local business owners, schools and the community as a whole. An opportunity exists in Jefferson County for us to work together to create a clean energy future.



EXPECTED LOCAL ECONOMIC BENEFITS

-  150 Construction jobs
-  10 Permanent, full-time jobs
-  Up to \$1 million annually in direct lease and easement payments to landowners (\$30 million over 30 years)
-  Up to \$1.5 million annually in increased revenues to county and local municipal tax bases to help defray costs for schools, public safety and county services (\$45 million over 30 years)
-  \$5 million estimated project spending on local goods and services during development and construction

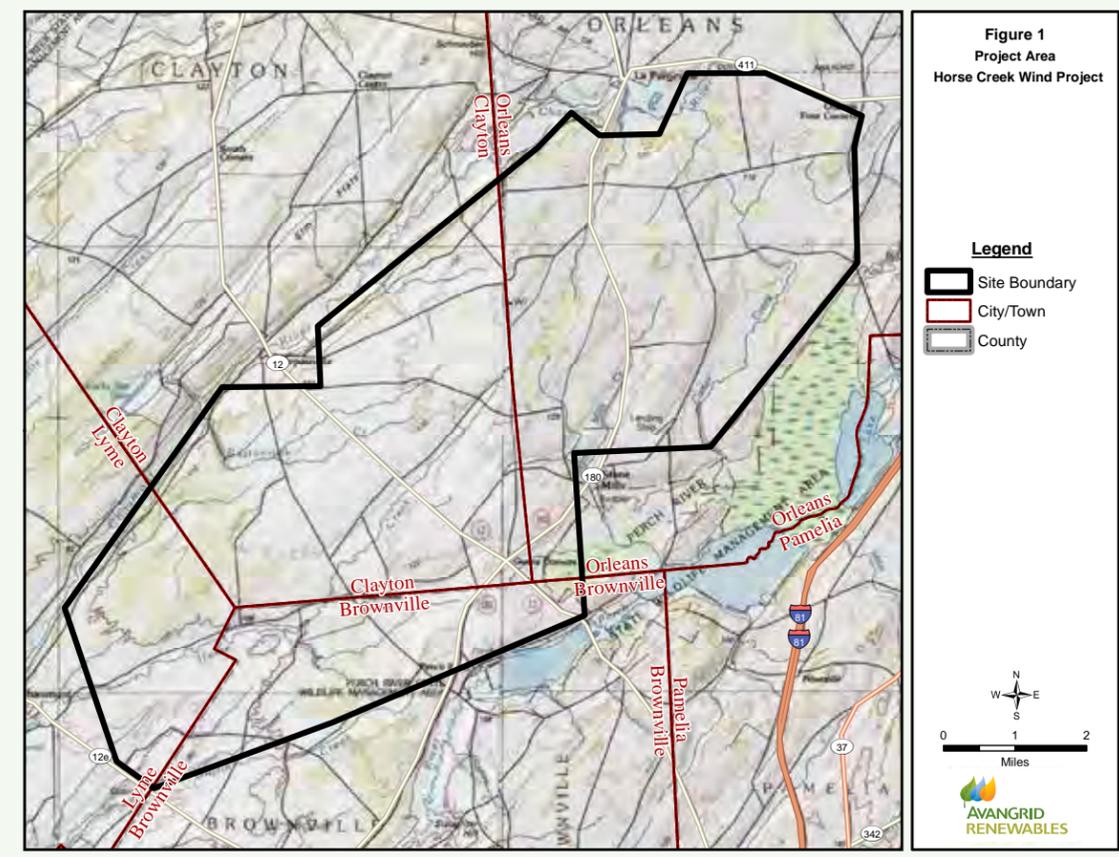
Horse Creek Wind Project Overview

Avangrid Renewables has proposed the development of a new wind energy project in Jefferson County, the Horse Creek Wind Project. We are working closely with local community members, government officials and other stakeholders every step of the way to ensure a project that has a positive impact on all involved.

COMMUNITY SUPPORT

In June 2016, a third-party research firm conducted a wind turbine opinion survey among 500 randomly selected registered voters in Jefferson County:

- 90%** Generally support using wind energy to reduce reliance on fossil fuels and traditional energy sources
- 75%** Support having wind turbines operating in Jefferson County
- 64%** Think that wind turbines would have no effect on tourism in Jefferson County
- 12%** Think wind turbines would help tourism



LOCATION: Towns of **Brownville, Clayton, Lyme** and **Orleans**.

CURRENT STATUS: The Horse Creek Wind Project is currently in the **pre-application and Public Involvement Program phase** of the state's multi-year Article 10 process.

Article 10 is an established process in New York state for the siting of electric generating facilities. It includes local input, state oversight and scientific research guided by numerous state and federal agencies on a variety of environmental and engineering questions.

NUMBER OF TURBINES: **60 to 72** wind turbines anticipated.

CAPACITY: Approximately 205 megawatts (MW) of clean and renewable wind energy (estimated generating capacity). Expected to produce enough clean, homegrown electricity to power **nearly 50,000** average New York homes annually.

