

Michael P. Mahoney
P.O. Box 284
Wainscott, NY
860-729-2333

November 16, 2020

Honorable Michelle L. Phillips
Secretary of the Commission
New York State Department of Public Service
Three Empire Plaza
Albany, New York 12233-1350

via Electronic Mail Only

Re: Case 18-T-0604 – Application of South Fork Wind LLC (formerly Deepwater Wind South Fork, LLC) for a Certificate of Environmental Compatibility and Public Need for the Construction of Approximately 3.5 Miles of Submarine Export Cable from the New York State Territorial Waters Boundary to the South Shore of the Town of East Hampton in Suffolk County and Approximately 4.1 Miles of Terrestrial Export Cable from the South Shore of the Town of East Hampton to an Interconnection Facility with an Interconnection Cable Connecting to the Existing East Hampton Substation in the Town of East Hampton, Suffolk County.

Dear Secretary Phillips:

I am party in the above-captioned proceeding. Please see my response to the Motion of South Fork Wind LLC to Strike Testimony of Simon V. Kinsella in the above-captioned proceeding.

Should you have any questions, please do not hesitate to contact me via reply email (michaelmah2008@gmail.com) or via telephone (860-729-2333). Thank you.

Sincerely,



Michael P. Mahoney

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

Application of Deepwater Wind South Fork, LLC for a Certificate of Environmental Compatibility and Public Need for the Construction of Approximately 3.5 Miles of Submarine Export Cable from the New York State Territorial Waters Boundary to the South Shore of the Town of East Hampton in Suffolk County and Approximately 4.1 Miles of Terrestrial Export Cable from the South Shore of the Town of East Hampton to an Interconnection Facility with an Interconnection Cable Connecting to the Existing East Hampton Substation in the Town of East Hampton, Suffolk County.

Case No. 18-T-0604

RESPONSE BY MICHAEL P. MAHONEY TO
MOTION OF SOUTH FORK WIND LLC
TO STRIKE ENTIRE TESTIMONY OF SIMON KINSELLA

I, Michael P. Mahoney, am an intervening party in the above referenced proceeding.

On November 5, 2020, South Fork Wind LLC (formerly Deepwater Wind South Fork LLC) served a motion to strike the testimony of Simon Kinsella in its entirety.

On November 11, 2020, Administrative Law Judge Belsito invited (via email) other parties who “wish to respond to the Applicant’s motion ... may do so by close of business on November 16, 2020.” This is my response to Applicant’s Motion to Strike Testimony.

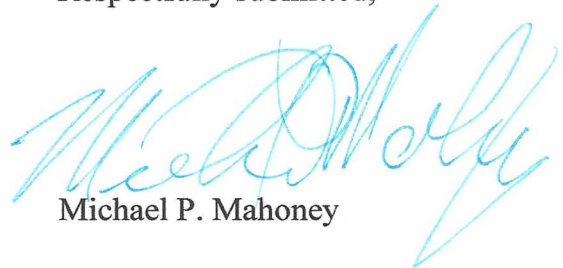
Mr. Kinsella has contributed to the record testimony that I have found to be well researched, reliable and substantiated. Mr. Kinsella has introduced facts into the proceeding that otherwise would not have been included. His testimony is factual, informative, and helpful and I believe he is knowledgeable about the subject matter of his testimony. I feel that it is vitally

important that Mr. Kinsella's research remain included as testimony in this Article 7 and public review process. The proposed work site will potentially expose the public and workers to a known health hazard as evidenced by the contamination of our well water, and this information would have gone relatively ignored if it were not for Mr. Kinsella. I object to the applicant's attempt to censor relevant environmental testimony and I applaud the enormous commitment of time and effort Mr. Kinsella has invested in his research. We need more, not less of it.

Mr. Kinsella should be treated in the same manner as all other parties in this proceeding and be "afforded reasonable opportunity to present evidence and examine and cross-examine witnesses." [16 NYCRR § 4.5(a)]

For the reasons cited (above), I respectfully request that the Motion by South Fork Wind LLC to Strike Testimony of Simon Kinsella be denied in full.

Respectfully submitted,



Michael P. Mahoney

November 16, 2020

Wainscott, New York