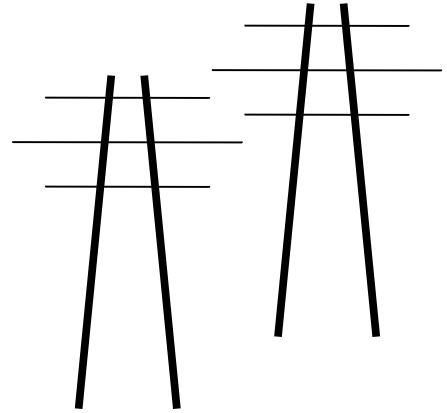


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February 23, 2011

Kathleen Sheehy  
Administrative Law Judge  
Office of Administrative Hearings  
P.O. Box 64620  
St. Paul, MN 55164-0620

RE: Subpoena Requests  
In the Matter of the Application of Goodhue Wind, LLC for a Certificate of Need  
and Siting Permit  
OAH Docket: 3-2500-21662-2; MPUC Docket No.: IP-6701/WS-08-1233

Dear Judge Sheehy:

Attached please find subpoena requests for Ingrid E. Bjorklund and Michael J. Bull in the above-entitled matter.

These subpoenas are being requested based on the Affidavits submitted by MOES' Deborah Pile and Ingrid Bjorklund regarding legislative intent. Those Affidavits were eFiled and entered in the record of this proceeding and should be subject to cross-examination. In addition, both MOES and Applicants relied heavily on statements by Michael Bull, then of the Department of Commerce/Governor's Office, and their characterization is hearsay. Though the administrative rules are more lax regarding hearsay, Michael Bull's testimony is necessary.

Thank you for your consideration of these requests.

Very truly yours,

Carol A. Overland  
for  
Goodhue Wind Truth

cc: eFiled & eServed

<b>OFFICE OF ADMINISTRATIVE HEARINGS</b> P.O. Box 64620, St Paul, MN 55164-0620 Phone: (651) 361-7900 Fax: (651)361-7900		<b>SUBPOENA REQUEST FORM</b> Minn Rule Pt. 1405.1300; 1400.7000 OAH Docket 3-2500-21662-2  Request Date: February 23, 2011
<b>Name of Judge:</b> Kathleen Sheehy	<b>Type of Subpoena</b> Hearing testimony & documents Information re: Statements in Affidavit of 12/20/10	

IN THE MATTER OF THE APPLICATION OF  
GOODHUE WIND, LLC...

OAH Docket 3-2500-21662-2  
MPUC Docket No.: IP-6701/WS-08-1233

Requesting Party or Attorney	Person Being Served
Carol A. Overland, Intervenor Goodhue Wind Truth OVERLAND LAW OFFICE - Legalectric P.O. Box 176 Red Wing, MN 55066 (612) 227-8638 overland@legalectric.org	Ingrid E. Bjorklund State Permit Manager/Wind Permit Coordinator Minnesota Dept. of Commerce 85 – 7 <sup>th</sup> Place East, Suite 500 St. Paul, MN 55101 800-657-3794

**Date and Location for Testimony in Evidentiary Hearing:**

Date: March 17 or 16, time certain to be arranged  
Location: Public Utilities Commission, LargeHrg. Rm., 121 – 7<sup>th</sup> Place E., St. Paul, MN 55101  
Requested for Testimony and production of documents  
Documents: Any additional documents, letters, notes, etc. regarding subject of Affidavit of December 20, 2010.

**Offer of Proof - Relevancy of Testimony and Documents to be Subpoenaed**

Ms. Bjorklund submitted an Affidavit for the record regarding passage of SF 145, Minn. Stat. §216F.081, and legislative intent. Upon information and belief, Ms. Bjorklund was a wind industry lobbyist at that time. Her statements in the Affidavit must be subject to cross-examination, and all documents, recordings, and notes upon which this Affidavit was based should be produced.

Dated: February 23, 2011




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<b>OFFICE OF ADMINISTRATIVE HEARINGS</b> P.O. Box 64620, St Paul, MN 55164-0620 Phone: (651) 361-7900 Fax: (651)361-7900		<b>SUBPOENA REQUEST FORM</b> Minn Rule Pt. 1405.1300; 1400.7000 OAH Docket 3-2500-21662-2  Request Date: February 23, 2011
<b>Name of Judge:</b> Kathleen Sheehy	<b>Type of Subpoena</b> Hearing testimony & documents Information re: Statements in Affidavit of 12/20/10	

IN THE MATTER OF THE APPLICATION OF  
GOODHUE WIND, LLC...

OAH Docket 3-2500-21662-2  
MPUC Docket No.: IP-6701/WS-08-1233

Requesting Party or Attorney	Person Being Served
Carol A. Overland, Intervenor Goodhue Wind Truth OVERLAND LAW OFFICE - Legalectric P.O. Box 176 Red Wing, MN 55066 (612) 227-8638 overland@legalectric.org	Michael Bull Senior Resource Planner Xcel Energy 414 Nicollet Avenue South Minneapolis, MN 55101 (800) 328-8226

**Date and Location for Testimony in Evidentiary Hearing:**

Date: March 16 or 17, time certain to be arranged  
Location: Public Utilities Commission, LargeHrg. Rm., 121 – 7<sup>th</sup> Place E., St. Paul, MN 55101  
Requested for Testimony regarding SF 145, Minn. Stat. §216F.081  
Documents: Any additional documents, letters, notes, etc. regarding SF 145, Minn. Stat. §216F.081 and legislative intent.

**Offer of Proof - Relevancy of Testimony and Documents to be Subpoenaed**

Michael Bull was quoted, and/or his statements summarized, in Affidavits of Ingrid Bjorklund and Deborah Pile, Dept. of Commerce, who submitted Affidavits for the record regarding passage of SF 145, including Minn. Stat. §216F.081, and legislative intent. Todd Guerro, Attorney for AWA Goodhue, also quoted and/or summarized Mr. Bull's statements regarding SF 145, statements to the legislative committees, and Minn. Stat. §216F.081. At the time, Michael Bull was an employee of the Dept. of Commerce, also working in the Governor's Office, and was involved in legislative activities. Mr. Bull is requested to provide testimony regarding SF 145, his appearances before Legislative Committees, and any and all other activities regarding SF 145 and its House counterpart, and provide all documents, recordings, and notes upon which his testimony is based.

Dated: February 23, 2011



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