

STATE OF MINNESOTA
OFFICE OF ADMINISTRATIVE HEARINGS

FOR MINNESOTA PUBLIC UTILITIES COMMISSION

In the Matter of the Application of Freeborn
Wind Energy LLC for a Large Wind Energy
Conversion System Site Permit for the 84 MW
Freeborn Wind Farm

**MINNESOTA DEPARTMENT OF
NATURAL RESOURCES' MOTION TO
QUASH A HEARING SUBPOENA FOR
LISA JOYAL AND, IN THE
ALTERNATIVE, OBJECTION TO
INTERVENOR'S HEARING SUBPOENA
FOR LISA JOYAL**

OAH Docket No. 80-2500-34633
MPUC IP-6946/WS-17-410

TO: Freeborn Wind Energy LLC, and its attorney, Christina Brusven, Fredrickson & Byron,
P.A., 200 South Sixth Street, Suite 4000, Minneapolis, Minnesota 55402; and

Intervenor Association of Freeborn County Landowners and its attorney, Carol A.
Overland, Legalectric, Inc., 1110 West Avenue, Red Wing, Minnesota 55066.

MOTION

Pursuant to Minnesota Rules 1400.7000, subp. 3, the Minnesota Department of Natural Resources ("DNR") respectfully moves this Court for an Order quashing the subpoena of DNR employee Lisa Joyal.

This motion is based upon DNR's Memorandum and the Affidavit of Lisa Joyal submitted herewith.

Should Intervenor Association of Freeborn County Landowners wish to contest the motion, it is required to file a written response with the Court and serve copies on opposing counsel within ten working days after receiving the motion. *See* Minn. R. 1400.6600.

OBJECTION

Pursuant to Minnesota Rules 1400.7000, subp. 3, DNR respectfully files its objection to the subpoena of DNR employee Lisa Joyal.

This objection is based upon DNR's Memorandum and the Affidavit of Lisa Joyal submitted herewith.

Pursuant to Minnesota Rules 1400.7000, subp. 3, the Administrative Law Judge "shall cancel or modify the subpoena if it is unreasonable or oppressive"

Dated: February 9, 2018.

OFFICE OF THE ATTORNEY GENERAL
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/s/ Nur Ibrahim

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