

**In the Matter of the Application
of Champaign Wind LLC for a
Certificate to Install Electricity
Generating Wind Turbines in
Champaign County**

Christopher A. Walker (0040696)
Van Kley & Walker, LLC
137 North Main Street, Suite 316
Dayton, Ohio 45402
Telephone: (937) 226-9000
Facsimile: (937) 226-9002
Email: cwalker@vankleywalker.com

CERTIFICATE OF SERVICE

I hereby certify that, on October 14, 2012, a copy of the foregoing was served by electronic mail on M. Howard Petricoff (mhpetricoff@vorys.com); Michael J. Settineri (mjsettineri@vorys.com); Miranda Leppla (mrleppla@vorys.com); Chad Endsley (cendsley@ofbf.org), Jane Napier (jnapier@champaignprosecutor.com), Stephen Reilly (Stephen.Reilly@puc.state.oh.us), Devin Parram (Devin.Parram@puc.state.oh.us); Kurt P. Helfrich (Kurt.Helfrich@ThompsonHine.com); Philip B. Sineneng (Philip.Sineneng@ThompsonHine.com); Ann B. Zallocco (Ann.Zallocco@ThompsonHine.com); G.S. Weithman (diroflaw@ctcn.net); Maureen Brennan (MBrennan@bakerlaw.com); Sally Bloomfield (sbloomfield@bricker.com); Stephen Howard (smhoward@vorys.com); and Gretchen Petrucci (glpetrucci@vorys.com).

s/ Jack A. Van Kley

Jack A. Van Kley

10/18/12 Franken
12-25-1023

BEFORE THE OHIO POWER SITING BOARD

In the Matter of the Application)
of Champaign Wind LLC for a)
Certificate to Install Electricity) Case No. 12-0160-EL-BGN
Generating Wind Turbines in)
Champaign County)

STATE OF OHIO)
) SS
CUYAHOGA COUNTY)

RETURN OF SERVICE

On the 3 day of October, 2012, I served this subpoena on the following:
EDP RENEWABLES NORTH AMERICA LLC
as follows: to SANDY OF C.T. CORP.

SHERIFF'S FEES

Service \$ 6.00
miles traveled \$ 2.50
Total fees \$ 8.50

By: David Giera
Deputy Sheriff/Process Server
DAVID GIERA

Subscribed and sworn to before me, a

Jacquelyne J. White



JACQUELYNE J WHITE
Notary Public
In and for the State of Ohio
My Commission Expires
October 24, 2015

10/18/12
Franklin
12-25-1023

CUYAHOGA COUNTY
SHERIFF DEPT
CIVIL BRANCH

BEFORE THE OHIO POWER SITING BOARD

2012 OCT -2 P 12:49

In the Matter of the Application)
of Champaign Wind LLC for a)
Certificate to Install Electricity) Case No. 12-0160-EL-BGN
Generating Wind Turbines in)
Champaign County)

SUBPOENA

TO:

EDP Renewables North America LLC
c/o CT Corporation System, Statutory Agent
1300 East Ninth Street
Cleveland, OH 44114

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Upon application of Union Neighbors United, Inc., Julie Johnson, and Robert and Diane McConnell, you are hereby required to provide deposition testimony and produce records to their counsel, Van Kley & Walker, LLC, in the following proceeding:

In the Matter of the Application of Champaign Wind LLC for a
Certificate to Install Electricity Generating Wind Turbines in
Champaign County, Case No. 12-0160-EL-BGN.

You are to appear at the offices of Van Kley & Walker, LLC, 132 Northwoods Blvd., Suite C-1, Columbus, Ohio, on October 18, 2012, at 12 p.m. You shall bring with you unredacted originals or accurate unredacted copies of all records listed below that are in the possession, custody, or control of EDP Renewables North America LLC or its subsidiaries, parent companies, or sister companies. You need not appear at the office of Van Kley & Walker, LLC in person if you deliver the requested records by mail or other means to that office by October 17, 2012.²

1. All documents relating to any turbine blade failure or damage at any wind turbine project operated by or on behalf of EDP.
2. All documents relating to the turbine blade failure occurring on or around April 24, 2012 on the Timber Road II Wind Farm.
3. All telephone memoranda, correspondence, and other documents relating to the telephone discussion between Gabriel Alonso and Kim Wissman on May 1, 2012 about turbine blade failure at the Timber Road II Wind Farm.

² If you wish to communicate by telephone with Van Kley & Walker, LLC about this subpoena, you may contact Jack Van Kley at (614) 431-8900.

4. All memoranda, correspondence, and other documents relating to any other communication between EDP and the Ohio Power Siting Board about turbine blade failure.
5. All studies, reports, and other documents relating to the distance that turbine blades can fly when released from wind turbines.
6. All records relating or referring to shadow flicker produced by any wind turbines in the Timber Road II Wind Farm.
7. All records relating or referring to noise produced by any wind turbines in the Timber Road II Wind Farm, including but not limited to noise measurements.
8. All records relating or referring to complaints about the Timber Road II Wind Farm.

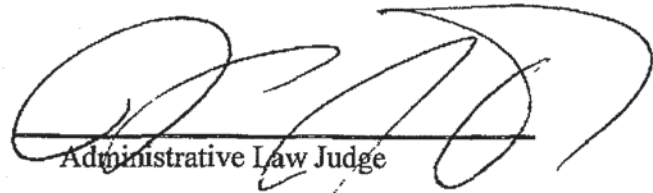
DEFINITIONS

The following definitions apply to the language used in the foregoing document requests:

1. "And" and "or" are both conjunctive and disjunctive and shall be interpreted to call for the most comprehensive information available.
2. "Documents" include but is not limited to all writings, correspondence, memoranda, letters, summaries, notes, reports, studies, manuals, telephone logs, calendars, charts, analyses, papers, contracts, tables, invoices, graphs, books, lists, purchase orders, memoranda of conversations, sample analyses, sample submission forms, laboratory sheets, sketches, photographs, slides, movies, films, videotapes, audiotapes, microfiche, data sheets, chain of custody sheets, manifests, minutes of meetings, jottings, plans, drawings, blueprints, records, permit application records, cards, literature, articles, telegrams, schematics, graphs, tapes, computer printouts, pamphlets, visual aids, and any other document as defined under the Board's rules. "Documents" is defined to the broadest extent permitted by OAC 4906-7-07 and includes, whenever applicable, the originals (absent any original, a copy) of any record of any intelligence or information (whether handwritten, typed, printed or otherwise visually or aurally reproduced) in your possession, custody or control. "Documents" include drafts and all copies which are not identical to the originals, such as those bearing marginal comments, alterations, notes or other notations not present on the original. "Documents" also includes e-mail and any other record in electronic form, including messages deleted or otherwise stored in any database or stored by any internet service provider.

3. "EDP" means EDP Renewables North America LLC and its subsidiaries, parent companies, and sister companies.
4. "Include" or "including" means including but not limited to.
5. "Relating to" means directly or indirectly mentioning, describing, referring to, pertaining to, being connected with, or reflecting upon the stated subject matter.
6. Where the context herein makes it appropriate, each singular word shall include its plural and each plural shall include its singular.
7. Each of the following words include the meaning of every other listed word: "each", "all", and "any".

Dated at Columbus, Ohio, this 26 day of September, 2012.



Administrative Law Judge

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

10/14/2012 9:35:11 PM

in

Case No(s). 12-0160-EL-BGN

Summary: Notice of Return of Service of Subpoena on EDP Renewables electronically filed by Mr. Jack A Van Kley on behalf of Union Neighbors United and Johnson, Julia Ms. and McConnell, Robert Mr. and McConnell, Diane Ms.