



**Iowa Association of Business & Industry**

400 East Court Ave, Suite 100

Des Moines, IA 50309-2017

December 14, 2015

Executive Secretary  
Iowa Utilities Board  
1375 E. Court Ave., Room 69  
Des Moines, IA 50319-0069

Re: Rock Island Clean Line, LLC  
Dockets E-22123, E-22124, E-22125, E-22126, E-22127, E-22128, E-22129, E-22130, E-22131, E-22132, E-22133, E-22134, E-22135, E-22136, E-22137 and E-22138  
Rock Island Clean Line LLC's Motion to Establish Procedural Schedule  
filed November 30, 2015

Dear Executive Secretary:

This letter is being submitted on behalf of the Iowa Association of Business and Industry ("ABI") and its approximately 1,400 member companies throughout Iowa. I am submitting this letter in support of the Rock Island Clean Line LLC's Motion to Establish a Procedural Schedule (the "Motion") in the above referenced matters.

As noted in a letter previously submitted to the Iowa Utilities Board ("IUB") in these Dockets, ABI is a broad-based membership organization of Iowa businesses which includes manufacturers, processors, retailers, financial institutions and other types of businesses throughout Iowa. ABI, formerly known as the Iowa Manufacturers Association, is the largest statewide business trade association in Iowa. Our 1,400 member companies employ over 300,000 employees in Iowa. Our mission is to foster a favorable business, economic, governmental and social climate within the state of Iowa so that our citizens have the opportunity to enjoy the highest possible quality of life. In furtherance of that mission, we support entrepreneurship that creates jobs, spurs private investment and economic growth and broadens the Iowa tax base. We seek to minimize burdensome governmental regulation that unnecessarily stifles the creation of economic growth by obstructing cost-effective private investment and privately funded infrastructure opportunities.

ABI's interest in the docketed matters referenced above is limited to the determination that the Rock Island Clean Line Project (the "Project") is necessary to serve a public use and is in the public interest, and we have no interest in participating in any portion of the proceeding regarding eminent domain on specific parcels. We imagine that many other individuals, organizations, and entities share ABI's sole interest in the determination of whether the Project is necessary to serve a public use. ABI supported Rock Island Clean Line LLC's prior Motion to Consider Eminent Domain in Separate Hearing. ABI has reviewed the instant Motion and supports the same, to the extent it proposes that the IUB consider those issues of interest to the ABI prior to consideration of the specific eminent domain issues.

**FILED WITH  
Executive Secretary**

**December 14, 2015**

**IOWA UTILITIES BOARD**

Iowa Utilities Board  
December 14, 2015

ABI understands that Rock Island Clean Line LLC (“Clean Line”) has indicated that it anticipates far fewer easements will need to be obtained through a request for eminent domain if it is allowed an opportunity to negotiate with landowners concerning easements after the IUB has made the determination concerning the route and the issuance of the franchise. ABI would anticipate that to be true. Fewer eminent domain requests will reduce administrative burdens and expense, which is consistent with ABI's mission. Granting Clean Line's Motion will also allow this important Project to move forward and give all interested parties a better understanding of the regulatory review process that will be followed. ABI does not believe the due process rights of any property owners will be jeopardized by the proposed procedural schedule, as all property owners will have an ability to participate and make their concerns known to the IUB. Based on ABI's reading of the Motion, it appears as though the failure of the IUB to grant the Motion could lead to the Project not being advanced by the applicant, which would be a significant loss for Iowa.

ABI understands that Iowa has a tremendous wind resource and believes it is critical for the state to support avenues for wind energy to be exported to other states and regions where the resource is needed.

Furthermore, as ABI understands the Project, the costs of the proposed transmission lines will not be borne by Iowa ratepayers who are members of ABI, but rather by the customers of the line (wind developers, and their ultimate load customers to the east of Iowa). If the Project is not advanced, current federal environmental regulations make it most likely that other transmission infrastructure will need to be put in place to get the Iowa wind resource to markets, and that additional infrastructure will likely be planned and cost-allocated through multiple Regional Transmission Organization processes, thus directly exposing Iowa ratepayers and the members of ABI to the risk of bearing some of those costs. In light of the unprecedented opportunity that the Rock Island Clean Line project represents for Iowa ratepayers to avoid costs, the IUB must consider procedural flexibility to ensure that its processes are not hostile to the Project's needs.

ABI looks forwards to the IUB's response on these issues.

Sincerely yours,

/s/

Michael Ralston  
President  
Iowa Association of Business and Industry