



ENVIRONMENTAL LAW & POLICY CENTER
Protecting the Midwest's Environment and Natural Heritage

December 14, 2015

Ms. Judi Cooper
Deputy Executive Secretary
Iowa Utilities Board
1375 East Court Avenue, RM 69
Des Moines, IA 50319-0069

**FILED WITH
Executive Secretary
December 14, 2015
IOWA UTILITIES BOARD**

RE: Rock Island Clean Line Motion to Establish Procedural Schedule, Docket Nos. 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, E-22138

Dear Ms. Cooper:

The Environmental Law & Policy Center submits this letter in support of the Motion to Establish Procedural Scheduled filed with the Iowa Utilities Board by Rock Island Clean Line LLC (Clean Line) on November 30, 2014.

The Environmental Law & Policy Center (ELPC) is a non-profit corporation with an office in Des Moines and members who reside in the State of Iowa. ELPC's goals include promoting clean energy development and advocating for policies and practices that facilitate the use and development of clean energy such as solar and wind power. ELPC has invested significant time and resources into promoting clean energy development in Iowa and nine other states in the Midwest.

In its Motion to Establish Procedural Schedule, Clean Line requested that the Board establish a schedule to review its Petitions for Electric Transmission Line Franchise in two phases. The first phase would focus on the substantive issues, including whether the proposed line is necessary to serve a public use and whether the line represents a reasonable relationship to an overall plan of transmitting electricity in the public interest. The appropriate route and Clean Line's eligibility to utilize eminent domain as a general matter would also be included in phase one. The second phase would focus on land acquisitions and any requested eminent domain for specific parcels of land. We recognize the dates and time frame included in Clean Line's Motion are proposed and

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subject to adjustment by the Board.

We support the proposed procedural schedule and two distinct phases. Our organizations are considering an intervention in the dockets. Our interests would relate to the issues identified in the proposed phase one of the proceeding, including the public use and public interest considerations as well as the general route. We would not have an interest in the proposed phase two of the schedule. The proposed procedural schedule would significantly improve the administrative efficiency and convenience to the public and to us as a party, assuming we request and are granted intervention status. The proposed phases would allow us to fully participate in those parts of the proceeding in which we have a significant interest.

We note that Iowa has significant wind energy development potential. Iowa's technical potential for wind generation is approximately 571,000 megawatts (MW). The 2015 Department of Energy's *Wind Vision* study identifies benchmarks for Iowa wind development as part of a national deployment of wind to reach 20% wind by 2030 and 35% wind by 2050. In Iowa, these benchmarks are between 17,000 MW and 20,000 MW of installed wind capacity by 2030 and between 37,000 MW and 46,000 MW by 2050. Reaching these levels of wind in Iowa would contribute significant economic and environmental benefits, including job creation, consumer savings, and reduced emissions.

The *Wind Vision* report, like other studies, identifies transmission constraints as one of the primary limits on wind development, particularly in the Great Plains/Interior region that includes Iowa. We strongly encourage the Board to fully consider the proposal from Clean Line. We believe the proposed procedural schedule will enable that review, and we encourage the Board to establish the schedule as requested by Clean Line.

Sincerely,

/s/ Joshua T. Mandelbaum
Staff Attorney
Environmental Law & Policy Center