

January 06, 2016

IOWA UTILITIES BOARD

STATE OF IOWA
DEPARTMENT OF COMMERCE
BEFORE THE IOWA UTILITIES BOARD

IN RE: ROCK ISLAND CLEAN LINE LLC	DOCKET NO. E-22128
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AFFIDAVIT OF MAILING

STATE OF IOWA)
) ss.
COUNTY OF POLK)

The undersigned, after first being duly sworn on oath, states that on the 6th day of January, 2016, I personally mailed to each of the following named persons a copy of a cover letter to the Executive Secretary of the Iowa Utilities Board and a Response to Rock Island Clean Line, LLC's Reply to Responses to Motion to Establish Procedural Schedule (in the forms attached hereto for reference) by U. S. Mail. (Only the face page of the Response is attached hereto to identify that filing). Said Response and cover letter copies were mailed in a sealed envelope with proper postage thereon, addressed to the said persons respectively, at their last known Post Office addresses, by depositing the same on said date in a United States Post Office mail receptacle in said County, to-wit:

Margaret Mennenga
227 Luicks Lane South
Belmond, IA 50421

Eugene Pals
1107 Third Street NE
Belmond, IA 50421

John Goemaat
1045 Rake
Belmond, IA 50421

/s/ Fred L. Dorr
Fred L. Dorr, Affiant

This Affidavit was signed before me by the Affiant, Fred L. Dorr, on January 6, 2016.

/s/ Carol A. Jansen
Notary Public in and for the State of Iowa
My Commission Expires June 8, 2018
Commission No. 790354

-LAW OFFICES

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January 5, 2016

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

Re: Rock Island Clean Line LLC
Docket No.: E-22128
Objector Iowa Farmland, LLC's Response

Dear Executive Secretary:

Enclosed please find Objector Iowa Farmland, LLC's Response to Rock Island Clean Line, LLC's Reply to Responses to Motion to Establish Procedural Schedule in the above-referenced docket, as filed today on EFS.

Sincerely,

WASKER, DORR, WIMMER & MARCOUILLER, P.C.

/s/Fred L. Dorr

Fred L. Dorr

FLD:caj
Enclosure

STATE OF IOWA
DEPARTMENT OF COMMERCE
BEFORE THE IOWA UTILITIES BOARD

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**RESPONSE TO ROCK ISLAND CLEAN LINE, LLC'S
REPLY TO RESPONSES TO MOTION TO
ESTABLISH PROCEDURAL SCHEDULE**

COMES NOW Objector Iowa Farmland, L.L.C. ("**Iowa Farmland**" or "**Objector**") and for its filing as styled above submits this response to address various issues raised in Rock Island Clean Line, LLC's (hereinafter "**RICL**") Reply to Responses to Motion to Establish Procedural Schedule.

On December 21, 2015 RICL filed its reply ("**Reply**") to various responses elicited by its earlier motion seeking to revive its previously filed bifurcation attempt. That effort was twice rejected by the Iowa Utilities Board ("**TUB**") and should be denied once again.

Iowa Farmland's History With RICL Land Agents: This Objector, Iowa Farmland, has firsthand experience with the manner in which RICL treats landowners as its land agents seek voluntary easements for its transmission line project across Iowa.

As noted in its written objection filed in this docket on July 25, 2014, RICL has proposed construction of its transmission route on and over 410 acres of Wright County, Iowa property owned by Iowa Farmland. That corridor cuts through approximately the middle of that land, nowhere near any roadway, railroad right-of-way or division line of lands as required by Iowa Code Section 478.18(2). Nor is that route considerate of the additional code requirement that it not, "unnecessarily interfere with the use of any lands by the occupant." *Id.*