

STATE OF IOWA  
DEPARTMENT OF COMMERCE  
UTILITIES BOARD

<b>IN RE:</b>  <b>ROCK ISLAND CLEAN LINE LLC</b>	<b>DOCKET NO. E-22129</b>  <b>PETITION TO INTERVENE</b>
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Pursuant to the Order Setting Scheduling Conference and Setting Intervention Date (“Order”) issued in this docket by the Iowa Utilities Board (“Board”) on June 23, 2016, DJF Farmland Holdings. (“DJF”) petitions the Board to intervene in this proceeding. In support, DJF states as follows:

1. On November 6, 2014 Rock Island Clean Line, LLC (“Rock Island”) filed with the Board sixteen petitions for electric transmission line franchises in sixteen Iowa counties. DJF filed its objections to the electric transmission line (the “Project”) on or about March 11, 2014.<sup>1</sup>
2. Through the Order, the Board has set July 6, 2016 as the deadline to file Petitions to Intervene.
3. DJF owns approximately 151 acres located in Franklin County, Iowa (the “Farm”).<sup>2</sup> DJF uses the Farm to produce row crops – specifically, corn and beans.
4. Approximately 12 individuals are employed in connection with this farming operation. Five different families receive income from the Farm.

<sup>1</sup> DJF incorporates its objections into this Petition to Intervene by this reference.

<sup>2</sup> The Project will affect property owned by DJF and located in 22-93-21, Richland Township.

5. As proposed, the Project appears to cut across DJF's fields, creating undue injury and inconvenience to DJF.

6. DJF has a clear interest in the subject matter of this proceeding, as it will be directly affected by its outcome. The adverse effects include the loss of high-quality soil (CSR1 of 79.0; CSR2 of 85.7), anticipated severe compaction of the soil and disruption of microorganisms, and anticipated new difficulties in farming the farm, among others. DJF anticipates that these adverse effects will impose significant economic burdens on its farming operation.

7. DJF also anticipates that the location of the lines and towers will significantly impact its ability to use center-pivot irrigation and aerial crop spraying.

8. Additionally, DJF purchased the Farm for the purpose of leasing it to a tenant as a secure investment. DJF specifically chose the Farm because of its location away from potential hazards. Installation of the project and the favoring of Rock Island's economic interests will hinder DJF's purposes in owning the Farm.

9. At this time, DJF intends to primarily monitor the filings, but may submit prepared testimony and exhibits, participate in status and evidentiary hearings, and otherwise participate in the proceeding as a party. Additionally, DJF would like to participate in the scheduling conference set for 2:00 p.m. on July 11, 2016.

10. DJF will be represented by counsel identified below.

WHEREFORE, DJF Farmland Holdings respectfully request that the Board issue an order granting its petition to intervene as a party in this matter and to participate as its interests may appear.

/s/ Joseph W. Younker

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