

**STATE OF IOWA
DEPARTMENT OF COMMERCE
BEFORE THE IOWA UTILITIES BOARD**

IN RE: Rock Island Clean Line LLC	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
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WIND ON THE WIRES' COMMENTS ON PROCEDURAL SCHEDULE

COMES NOW Wind on the Wires' comments on the separate procedural schedules submitted by Staff of the Iowa Utilities Board ("IUB") and by Rock Island Clean Line LLC's (see Attachments A and B, respectively) and in response to the Iowa Utility Board's ("IUB") request, made at the scheduling conference held on July 11, that the parties provide written comments by 3pm central time, Friday, July 15, 2016.

Wind on the Wires comments on the proposed schedules are as follow:

1. The proposed schedules are largely similar on key dates, but differ on their level of detail: Rock Island's proposed schedule has a higher level of detail, including specificity and additional milestones than Staff's proposed schedule. Below is a chart providing a side by side comparison of the key milestones proposed by Staff and Rock Island, with key differences noted in red text:

Schedule Milestone	Staff Proposal	Rock Island Proposal
Staff Commences Petition review and field inspections	8/1/2016	11/2016
Clean Line submits initial Exhibit E	8/1/2016	5/1/2017
Official Notice issued and publication arranged	???	5/2017
Deadline for Intervention	???	6/2017
Staff issues deficiency report on Petition	7/2017 ¹	7/2017
Clean Line files amended final Exhibit E	???	8/1/2017
Staff issues report on Exhibit E and identifies matters to be addressed in testimony	???	8/21/2017
Clean Line files testimony	8/1/2017	9/15/2017
Supporting Intervenors file testimony	???	10/1/2017
Intervenors file testimony	Late 10/2017	
OCA and Opposing Intervenors file testimony	???	11/1/2017
Clean Line files rebuttal/reply testimony	12/2017	12/1/2017
Hearing	Prior to 2/1/2018	Anytime in January or February 2018
Initial Briefs	???	3/15/2018
Reply Briefs	???	4/15/2018
Decisions Meeting	???	5/15/2018
Decisions Deadline	5/27/2018	5/28/2018

2. Wind on the Wires will comment on the filing dates for Exhibit E, and the dates for filing intervenor testimony and briefs.

3. Wind on the Wires supports the date Rock Island has proposed for it to file its initial Exhibit E -- which is May 2017. The Iowa Utilities Board (“Board“) should give Rock Island

¹ This is Wind on the Wires’ interpretation of the “Staff Report” proposed for July 1, 2017 in the IUB Staff Proposed Schedule. That filing could also be interpreted as the “Staff issues a report on Exhibit E and identifies matters to be addressed in testimony” milestone identified in the Clean Line proposed schedule.

the opportunity to ensure the initial Exhibit E filing is as accurate as can be. The additional time afforded Rock Island to prepare its Exhibit E will minimize delays that could be caused by documentation errors and prevent there being evidentiary arguments based on inaccurate data. This is a very long project -- over 500 miles in length, 370+ miles is within the state of Iowa -- that potentially touches thousands of properties. Given the length of this project, granting Rock Island until May 2017 to finish the outstanding property descriptions and eminent domain issues is prudent for the administrative efficiency of this hearing and still provides sufficient time for parties to submit testimony and briefs and the Board to render its decision prior to the May 2018 deadline.

4. The time needed for IUB staff to review Exhibit E is critical. If the comments do not provide sufficient guidance on the activities Staff and Rock Island need to perform and the time to perform those activities, the Board should consider directing Staff and Rock Island to meet and mutually agree upon a date for submission of Exhibit E. Once that date is established the Board should be able to define the remaining milestone dates.

5. Wind on the Wires recommends that all intervenors submit testimony on the same date, 4 to 6 weeks after Rock Island files its direct testimony. Four to six weeks gives expert witnesses time to prepare any new comments that we would want to present in response to Rock Island's testimony.

6. For initial and reply briefs, Wind on the Wires requests six to eight weeks post evidentiary hearing to prepare the initial brief, and four weeks to prepare the reply brief. This appears to be consistent with what Rock Island has proposed.

WHEREFORE, Wind on the Wires' respectfully requests the Iowa Utilities Board approve a schedule that is consistent with the recommendations set forth above.

Respectfully submitted,

Dated: July 15, 2016

_____/s/_____
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**ATTACHMENT A
Wind on the Wires' Comments
on Procedural Schedule**

IUB STAFF PROPOSED SCHEDULE

May 27, 2018 Deadline for Board Decision

Hearing must be completed no later than end of January 2018.

Rock Island Clean Line Rebuttal Testimony filed by December 2017

Intervenor testimony filed late October 2017

Rock Island Clean Line Direct Testimony filed by August 1, 2017

Staff Report filed by July 1, 2017

Staff needs to begin the route review process no later than August 1, 2016

Rock Island Clean Line to file complete Exhibit E documents for at least two counties by August 1, 2016.

**ATTACHMENT B
Wind on the Wires' Comments
on Procedural Schedule**

ROCK ISLAND'S PROPOSED SCHEDULE

**Draft Outline of Procedural Schedule for Rock Island Clean Line Matter
Dockets E-22123 through E-22138**

- July – Oct 2016 – staff continues to hold off on petition review and Clean Line pursues easement negotiations;
- Nov., 2016 – April, 2017 – staff commences Petition review and field inspections and the company and staff go through deficiency cycle. Company continues easement negotiations.
- May 1, 2017 – Initial Exhibit E documents submitted
- May, 2017 – Official Notice is issued and publication arranged
- June, 2017 – final deadline for any intervenors
- July, 2017 – staff issues report on Petitions and matters to be addressed in direct testimony and exhibits
- August 1, 2017 – Clean Line files final Exhibit E documents
- August 21, 2017 – Staff issues report on Exhibit E documents and matters to be addressed in testimony
- September 15, 2017 – Clean Line files prepared testimony and Exhibits
- October 1, 2017 – supporting intervenors file testimony and Exhibits
- November 1, 2017 – OCA and opposing intervenors file testimony and exhibits
- December 1, 2017 – Clean Line files reply testimony and exhibits
- Jan and Feb 2018 – Hearing (anticipate at least a 3 week hearing process sometime during these months)
- March 15, 2018 – initial post hearing briefs
- April 15, 2018 – Reply Briefs
- May 15, 2018 – Decision Meeting
- May 28, 2018 – Decision Deadline