

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

IN RE:	:	DOCKET NO. E-22248
	:	(Dockets E-22123 through E-22138)
ROCK ISLAND CLEAN LINE LLC	:	WITHDRAWAL OF PETITIONS FOR
	:	ELECTRIC FRANCHISE
	:	

COMES NOW, Rock Island Clean Line LLC ("Clean Line"), and hereby withdraws the Sixteen (16) Petitions for Electric Line Franchise filed with the Board on November 6, 2014. In connection with this withdrawal, Clean Line states as follows:

1. The Petitions for Electric Line Franchise were filed in sixteen (16) different counties; but all pertained to a common project, a proposed high voltage, direct current transmission line capable of delivering 3,500 megawatts of power from renewable energy sources located primarily in northwestern Iowa to load and population centers in Illinois and elsewhere in the PJM Interconnection, L.L.C. grid (the "Project").
2. In order for the Project to be completed, regulatory approval is required from both the Iowa Utilities Board and the Illinois Commerce Commission.
3. On August 8, 2016, an Order was issued herein establishing a Procedural Schedule for the Iowa regulatory process. The Order established dates for filings and other actions that would permit the Board to fully consider the Project and render a decision within the time prescribed by new Iowa Code §478.6A, adopted May 27, 2016. Pursuant to said statute, a decision on the Clean Line franchise Petitions must be issued by the Board no later than May 27, 2018. At the time the Procedural Schedule was adopted, the Illinois Commerce Commission had already issued a decision favorable to the Project; however, said decision was on appeal.

4. On August 10, 2016, the Appellate Court of Illinois, Third District, issued a decision reversing the decision of the Illinois Commerce Commission. Said appellate court decision was appealed to the Illinois Supreme Court on September 14, 2016, by the Illinois Commerce Commission, Clean Line, and other parties. On November 23, 2016, the Illinois Supreme Court agreed to review the appellate Court's decision. It is contemplated that the Illinois Supreme Court decision will not be issued prior to May 2017.
5. The Procedural Schedule issued herein requires Clean Line to file initial Exhibit E documents for at least four counties on or before January 13, 2017, and to file initial Exhibit E documents for at least four counties by the 13th of each month thereafter, with all Exhibit E documents to be filed no later than May 1, 2017.
6. Given the regulatory uncertainty in Illinois and the statutory deadline for a decision on the current Petitions, Clean Line has elected to file this withdrawal of the Franchise Petitions rather than requesting a modification of the Procedural Schedule from the Board. Clean Line understands that it would be difficult for the Board to modify the present Procedural Schedule, and Clean Line does not deem it to be an efficient utilization of resources to proceed with the filing (including the submittal and review of the Exhibit E documents) until after the Illinois Supreme Court issues its decision concerning the Illinois regulatory approval.
7. Clean Line will make a determination concerning a new filing with the Board following resolution of the Illinois Supreme Court appeal.
8. Clean Line appreciates the time and effort devoted to this Project by the Board and its staff and looks forward to continuing to work with the Board following the Illinois Supreme Court decision.

Respectfully submitted

SULLIVAN & WARD, P.C.

_____/s/_____
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ATTORNEYS FOR
ROCK ISLAND CLEAN LINE LLC

CERTIFICATE OF SERVICE

I hereby certify that I have this day filed the foregoing document with the Iowa Utilities Board utilizing the Board's Electronic Filing System, and therefore causing the same to be served on all individuals or entities participating in these Dockets through said system.

Dated: December 22, 2016.

By: _____/s/_____
Dennis L. Puckett