

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

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| <b>IN RE:</b><br><br><b>INVESTIGATION INTO A<br/>COMPREHENSIVE PLAN FOR<br/>IOWA’S TRANSMISSION GRID<br/>OF THE FUTURE</b> | <b>DOCKET NO. INU-2021-0001</b><br><br><b>COMMENT</b> |
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The Iowa Farm Bureau Federation (Farm Bureau), pursuant to the “Order Initiating Investigation, Requesting Comments, and Setting Date of Workshop” filed in this docket by the Iowa Utilities Board (Board) on July 2, 2021, submits the following comments.

Farm Bureau is the largest general farm organization in the state with over 155,000 members. Our diverse membership includes landowners and tenants, customers, board members of rural electric cooperatives, and persons who utilize distributed generation on their farms. It is very important to our members that the property rights of landowners and tenants be respected when locating electric generation and transmission facilities. Because our members are major users of energy, keeping the costs of electrical energy low and having a reliable electrical energy system are priorities. We support a diverse mix of energy sources in order to meet our state’s energy demand year round.

Wind energy generation is an important part of the energy mix in Iowa, growing to 57% of our generated electricity in 2020.<sup>1</sup> Iowa has seen exponential growth in wind and solar energy generation over the past five years since the Iowa Energy Plan was prepared in 2016. At the

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<sup>1</sup> U.S. Energy Information Administration, Iowa State Energy Profile, last updated June 17, 2021. [Iowa - State Energy Profile Overview - U.S. Energy Information Administration \(EIA\)](#)

time the plan was being considered, the latest data showed Iowa's electric mix included only 28.7% wind and had no utility-scale solar.<sup>2</sup> With such monumental change now and in the near future, it would be appropriate for the state to update and evaluate the plan to ensure Iowa has adequate generation and the right mix of generation to meet our state's needs 8,760 hours a year, every year into the future.

The focus of the Board's Order describes the Board's desire to see more orderly planning and development of Iowa's electric transmission grid related to the development of this new wind and solar generation. While the Board's Order focuses on its authority over transmission lines, this discussion necessarily should also include the Board's authority over generation because the new generation facilities are driving the need for many of these new transmission lines. Currently both the generation facility siting and the interconnection point to the grid is chosen by the energy companies with little or no Board input. Once a proposed site for a generation facility has been selected by a developer, it requests an analysis and approval from the Midcontinent Independent System Operator (MISO) to connect to the grid. Once approved, this connection requires a transmission line from the generation facility site to the interconnection point. MISO determines what upgrades to the transmission system are required for the new generation to connect to the grid and then the Board reviews the exact routing from point A to point B. Therefore, the responsibility for planning for adequate generation currently falls on the energy companies themselves with the Board having some influence during ratemaking proceedings.

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<sup>2</sup> . See Iowa Energy Plan, Appendix C, p. 13 and Appendix D, p. 15, [Microsoft Word - IEP - AppC Energy Position.docx \(iowaenergyplan.org\)](#); [Microsoft Word - IEP - AppD Geographic Analysis.docx \(iowaenergyplan.org\)](#)

The Board currently does not review the siting of wind generation facilities and has exercised limited review over the relatively new to this state utility-scale solar generation. Counties exercise authority over siting with localized interests in mind, but the county ordinances by their nature do not consider long-range planning for generation or transmission for the state. MISO does plan regionally in its territory for the reliability of the transmission system, which connects generation to the consumer, under the supervision of the Federal Energy Regulatory Commission (FERC). However, this process is not transparent or conducive to public involvement. The Board and the Office of Consumer Advocate (OCA) do have defined roles and some influence in the MISO planning process, but the state agencies are not the decision-maker. To the extent that the Board and OCA can work with MISO to ensure the reliability and availability of electricity to Iowa consumers, our state would benefit from the effort.

Fundamentally, the Board's goal has been frustrated by the state's abdication of authority over the planning and siting for new energy generation facilities in this state.<sup>3</sup> Last year, the Board proposed, then withdrew, a proposal to exercise this authority.<sup>4</sup> Understanding Iowan's need for reliable energy, Farm Bureau supported this effort to afford the Board more oversight over generation. Landowners who commented in the docket were overwhelmingly concerned about whether the Board would grant a request for eminent domain to an energy company as a result of the rulemaking under Iowa Code § 476A.7. Landowners want to continue to make their own decisions over whether or not to allow this development on their property rather than having it forced upon them. Generation facilities are not required to be located on a specific tract of

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<sup>3</sup> See *Mathis v. Iowa Utilities Board*, 934 N.W.2d 423 (2019).

<sup>4</sup> See Docket No. RMU-2020-0028.

land so eminent domain should never be necessary. In contrast, transmission lines have utilized eminent domain to acquire easement rights to connect the generation facility to the grid.

With MISO and FERC's overriding authority over transmission, it leaves the Board with limited ability to influence new transmission lines in the state, but the Board retains statutory authority over generation, especially solar.<sup>5</sup> The reliability of the Iowa's electric system is highly dependent on the types of generation and where it is located within the state. According to MISO, "generation fleet change and extreme weather are increasing risk across the entire year (not just in the summer). MISO's Renewable Integration Impact Assessment concludes that the complexity of planning and operating the grid increases exponentially beyond 30% of the load being served by wind and solar, requiring more coordination and advanced action to maintain grid stability at higher renewable penetration levels."<sup>6</sup> MISO has declared an increasing number of emergencies since 2016 indicating a changing risk profile of the grid.<sup>7</sup> Both planning for generation in the state and participation in MISO's planning process for grid resiliency are important roles for the Board. Ultimately, the energy companies, the Board and MISO need to coordinate, plan and act to ensure that Iowa has reliable electricity generation and transmission to meet the projected demand for the foreseeable future.

Farm Bureau appreciates the opportunity to provide comment for the Board's consideration on the state's transmission grid. Farm Bureau plans on attending the August 30, 2021, workshop.

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<sup>5</sup> Iowa Code § 476A.2 (2021).

<sup>6</sup> MISO's Response to the Reliability Imperative, December 2020, updated April 2021, p. 2-3; [https://cdn.misoenergy.org/MISO%20Response%20to%20the%20Reliability%20Imperative%20FINAL\\_updated%204-29-2021504018.pdf](https://cdn.misoenergy.org/MISO%20Response%20to%20the%20Reliability%20Imperative%20FINAL_updated%204-29-2021504018.pdf)

<sup>7</sup> *Id. at. 9.*

Respectfully submitted,

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Signature: /s/ Christina L. Gruenhagen