

STATE OF IOWA
DEPARTMENT OF COMMERCE
BEFORE THE IOWA UTILITIES BOARD

IN RE:)
) Docket No. HLP-202-0001
SUMMIT CARBON SOLUTIONS LLC)

PETITION TO INTERVENE BY SIERRA CLUB IOWA CHAPTER

Comes now Sierra Club Iowa Chapter, pursuant to 199 I.A.C. § 7.13, and in support of this Petition to Intervene, states as follows:

1. The Iowa Chapter of the Sierra Club has approximately 7,000 members across Iowa and is part of a national organization with over 700,000 members. Our mission is to preserve and protect Iowa's environment. Sierra Club is working to mitigate climate change. Although Summit Carbon Solutions LLC (Summit) claims that its pipeline project will address climate change, Sierra Club disputes that and would present evidence at a hearing in this case to support that position. Summit also asserts that its project will enhance the long-term viability of the ethanol industry. Sierra Club believes that the use of ethanol serves to extend our reliance on fossil fuels, thus contributing to climate change. Finally, the Summit pipeline will be crossing numerous rivers and streams in Iowa. A rupture of the pipeline where it crossed those rivers and streams will release carbon dioxide into the water, filling the water with carbonic acid. Sierra Club members who recreate in and on these waters will be adversely impacted by a pipeline rupture.

2. If the Board issues a permit to construct and operate Summit's pipeline in this case, Sierra Club's interests as described above will be adversely impacted.

3. Sierra Club is not aware of any other entities who may become parties to this case who can represent Sierra Club's interests.

4. Sierra Club is not aware of any other means by which to protect its interests.

5. Sierra Club's proposed intervention will assist in the development of a sound record by presenting expert testimony, conducting discovery, and participating in the Board's evidentiary hearing in this case.

6. Sierra Club requests that the Board rule on this motion as soon as possible, rather than waiting for a procedural schedule, so Sierra Club can begin discovery procedures.

Based on the foregoing, Sierra Club requests that the Board authorize Sierra Club Iowa Chapter to intervene in this case.

/s/ *Wallace L. Taylor*

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