

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 FOOD & WATER WATCH

Comes now Food & Water Watch, pursuant to 199 I.A.C. § 7.13, and in support of this Petition to Intervene, states as follows:

1. Food & Water Watch has approximately 23,256 members and supporters across Iowa and is part of a national organization with over a million members and supporters. Our mission is to protect Iowa's environment, water resources, and farming communities; as well as to prevent the worst impacts of climate change.

2. Although Summit Carbon Solutions LLC (Summit) claims its pipeline will sequester carbon, Food & Water Watch disputes that claim and seeks to present evidence demonstrating the false solution of Summit's proposal. Summit also asserts that its project will enhance the long-term viability of the ethanol industry, despite the ethanol industry's tremendous harms to biodiversity due to intensive monocultural (corn only) production. This practice of monocultural production also directly incentivizes expanded factory farming of animals, a core issue for Food & Water Watch and its members.

3. In an era of limited grain resources around the planet (conflict in Ukraine, heat domes in India and Pakistan, and drought throughout the American west), it is a disservice to the people of Iowa and the planet to engage in the intensive process of converting food stocks to fuel.

4. Further, Food & Water Watch notes the production, storage, transporting and use of ethanol serves to extend the burning of fossil fuels, thus contributing to the ongoing climate change emergency with its impacts felt in Iowa and beyond.

5. Additionally, this pipeline project is designed to manipulate clean energy credit programs for the profit of a private entity at the expense to the people of Iowa.

6. Finally, the Summit pipeline will be crossing numerous waterbodies throughout Iowa and a construction incident or a later pipeline rupture at any location where the pipeline crosses those rivers and streams will release carbon dioxide into the water, resulting in carbonic acid. A carbonic acid incident will create harmful impacts by rendering any affected waters acidic with resulting impacts on water ecosystems including, but not limited to irrigation, vegetation, aquatic life, and nearby communities. Food & Water Watch members reliant upon and/or who recreate on those waters will be adversely impacted by a pipeline rupture.

7. If the Board issues a permit to construct and operate Summit's pipeline in this case, Food & Water Watch's interests as described above will be adversely impacted.

8. Food & Water Watch is not aware of any other entities who may become parties to this case who can represent Food & Water Watch's interests.

9. Food & Water Watch is not aware of any other means by which to protect its interests.

10. Food & Water Watch's proposed intervention will assist in the development of a sound record by presenting testimony and participating in the Board's evidentiary hearing in this case.

11. Food & Water Watch requests that the Board rule on this motion as soon

as possible, rather than waiting for a procedural schedule, so that Food & Water Watch can begin discovery procedures.

Based on the foregoing, Food & Water Watch requests that the Board authorize intervention in this case.

FOOD & WATER WATCH

By /s/ Adam S. Carlesco

Adam S. Carlesco, Staff Attorney
1616 P St., NW, Suite 300
Washington, D.C. 20036
202-683-4925

Email: acarlesco@fwwatch.org

ATTORNEYS FOR PETITION FOOD & WATER WATCH

LAWYER, LAWYER, DUTTON, DRAKE & CONKLIN L.L.P.

By /s/ Channing L. Dutton

Channing L. Dutton AT0002191
2469 106th St.
Urbandale, IA 50322
515-224-4400 FAX 515-223-4121

Email: cdutton@LLDD.net

ATTORNEYS FOR PETITIONER FOOD & WATER WATCH

CERTIFICATE OF SERVICE

The undersigned certifies that on 6/20/22, the foregoing instrument was electronically filed with the Iowa Utilities Board using the Electronic Filing System.

/s/ Channing L. Dutton

Channing L. Dutton AT0002191