FILED WITH Executive Secretary January 20, 2015 IOWA UTILITIES BOARD

STATE OF IOWA DEPARTMENT OF COMMERCE BEFORE THE IOWA UTILITIES BOARD

)
IN RE:) DOCKETS NO. E-22123, E-22124,
) E-22125, E-22126, E-22127, E-22128,
) E-22129, E-22130, E-22131, E-22132,
ROCK ISLAND CLEAN LINE LLC) E-22133, E-22134, E-22135, E-22136,
) E-22137, E22138
	THE PRESERVATION OF
	RURAL IOWA ALLIANCE
	RESPONSE TO
	PETITION FOR LEAVE TO
) INTERVENE
	OF WIND ON THE WIRES
)
	,

Preservation of Rural Iowa Alliance ("Alliance"), by and through the undersigned counsel, and in Response to the Petition to Intervene filed by Wind on the Wires, states as follows:

- 1. Wind on Wires filed its Petition to Intervene on January 8, 2015.
- 2. The Board's rules concerning interventions provide that "any person having an interest in the subject matter of a proceeding may be permitted to intervene at the discretion of the Board or presiding officer." 199 IAC 7.13(3). In determining whether to grant intervention, the Board is to consider the extent to which the prospective intervenor's interest will be represented by other parties. 199 IAC 7.13(3)"c". The rules further provide that the Board or presiding officer may limit a person's intervention to particular issues or to a particular stage of a proceeding, or may otherwise condition the intervenor's participation in a proceeding. 199 IAC 7.13(5). Finally, the rules provide that when two or more intervenors have substantially the same interest, the Board or presiding officer may order consolidation of the petitions and briefs and

limit the number of attorneys allowed to participate actively in the proceeding to avoid a duplication of effort. 199 IAC 7.13(6).

3. Alliance objects to the intervention. Wind on the Wires clearly has substantially

the same interest as Rock Island Clean Line and intervention will only result in duplication of

efforts. Wind on the Wires stated interest "supporting transmission system expansion" will

already be represented by Rock Island Clean Lines' efforts.

4. In the alternative, if the Petition to Intervene is granted, Alliance requests that

specific limitations be placed on Wind on the Wires participation prohibiting the filing of

duplicative type direct testimony, exhibits, or other evidence or conducting cross examination of

witnesses. Since Wind on the Wires intent is to participate and submit items "supporting the

need for the line" as stated in the Petition to Intervene, limiting or otherwise setting a proper

condition to Its participation in the proceedings seems appropriate to avoid duplication.

WHEREFORE, the Alliance objects to the Board's grant of intervention by Wind on the

Wires, or in the alternative requests limitations on such intervention for the reasons set forth

above.

Respectfully submitted,

BEVING, SWANSON & FORREST, P.C.

/s/ Justin E. LaVan

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ATTORNEY FOR THE

PRESERVATION OF RURAL

I RESERVATION OF RURA

IOWA ALLIANCE

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CERTIFICATE OF SERVICE

IOWA UTILITIES BOARD

I hereby certify that I have this day served the foregoing document upon all individuals or entities on the service list in accordance with the requirements of the rules of the Iowa Utilities Board, meaning those participating in the Electronic Filing System will be automatically served with notice. Dated at Des Moines, Iowa this _19th__ day of January, 2015.

By:
__/s/ Justin LaVan___

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141216 Alliance Comments RICL Request