

**STATE OF IOWA  
THE IOWA UTILITIES BOARD**

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<b>IN RE:</b>	<b>DOCKET NO. HLP-2021-0001</b>
<b>SUMMIT CARBON SOLUTIONS, LLC</b>	<b>MOTION TO REOPEN THE RECORD</b>

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COMES NOW the Iowa Farm Bureau Federation (“Farm Bureau” or “IFBF”) to respectfully request the Iowa Utilities Board (“IUB” or “Board”) to reopen the record, pursuant to Iowa Administrative Code 199-7.24, regarding Summit Carbon Solutions, LLC’s (“Summit”) petition for a hazardous liquid pipeline permit and receive further evidence related to the announced material and significant expansion of the proposed pipeline to determine the expansions’ potential impact, if any, on the pipeline proposed in this docket. Farm Bureau in support of its motion states the following:

1. On or about January 28, 2022, Summit submitted a petition for a liquified carbon dioxide pipeline which, as later amended, proposes to transport up to a maximum of twelve million metric tons per year of liquified carbon dioxide across 29 Iowa counties for almost 688 miles. *In re: Summit Carbon Solutions, LLC*, IUB Docket No. HLP-2021-0001, Petition for Hazardous Liquid Pipeline Permit, pg. 1 (filed January 28, 2022) (hereinafter “Petition”); Petition, page one revised (filed July 11, 2023); Petition, Ex. C. revised, pg. 1 (filed July 11, 2023); and, Petition, Ex. F revised, pg. 1 (filed July 14, 2023).

2. The evidentiary hearing for this Docket No. HLP-2021-0001 was held beginning August 22, 2023, and concluded November 8, 2023. Post-hearing briefs and reply briefs were also filed in the docket as of January 19, 2024. *See* IUB-Summit Carbon Solutions Information, Iowa Utilities Board, <https://iub.iowa.gov/summit> (last visited February 19, 2024).

3. Iowa Administrative Code § 199-7.24 authorizes the Board to reopen the record for the reception of further evidence upon the Board's own motion or on the motion of a party. The motion may be made at any time prior to the issuance of a final decision. Iowa Admin. Code § 199-7.24 (1/29/20). IFBF is an intervenor party and the IUB has not issued a final decision in this docket. *See generally, In re: Summit Carbon Solutions, LLC*, IUB Docket No. HLP-2021-0001.

4. Further, the IUB previously reopened the record on its own motion pursuant to Iowa Administrative Code § 199-7.24 in a recent hazardous liquid pipeline docket to receive limited additional evidence prior to making its decision. *In re: NuStar Pipeline Operating P'ship L.P.* IUB Docket No. HLP-2021-0002, Order Reopening Record and Requiring Update (filed March 8, 2023); *See also, S. E. Iowa Co-op. Elec. Ass'n v. Iowa Utilities Bd.*, 633 N.W.2d 814, 818 (Iowa 2001). In NuStar the Board requested additional evidence from the company to assist the Board in making its final decision. *Id.*

5. Summit identified twelve ethanol plants located in Iowa as participants or partners in the proposed carbon capture, transportation and sequestration project identified in Docket No. HLP-2021-0001. *See* Petition, Ex. F revised, pg. 1 (filed July 14, 2023). As described below, Summit recently announced a major expansion that would more than double the number of participating plants and plant shippers as well as increase the volume of carbon dioxide transported in the proposed pipeline.

6. In its most recently amended petition, Summit describes the proposed pipeline as being between six and twenty-four inches in diameter and it both describes and maps the exact diameter of pipeline along the proposed route. *See* Petition, pg. 1 revised, Ex. A revised, Ex. C revised at 1, Ex. M revised, Ex. N. revised (filed July 11, 2023); and Petition, Ex. F revised, pg.

1 (filed July 14, 2023). The legal description of the route includes the diameter of the pipe at each location along the route. *See* Petition, Ex. A revised (filed July 11, 2023). It is unknown whether the addition of nineteen ethanol plants will necessitate increasing the diameter of the pipe at certain locations along the proposed route identified in Exhibits A and M.

7. In its petition, Summit also describes the maximum operating pressure of the proposed pipeline as 2,183 pounds per square inch in gauge (“psig”) and the normal operating pressure of between 1,200 and 2,150 psig. Petition, Ex. C revised, pg. 1 (filed July 11, 2023). It is unknown whether the addition of nineteen ethanol plants will increase the normal operating pressure or maximum operating pressure of the hazardous liquid pipeline proposed in this docket.

8. The proposed pipeline in this docket includes at least three types of above ground appurtenant structures: valve sites, launch receiver sites, and pump stations. Additionally, all of these above-ground sites need access to a public road and therefore may include additional land for a private access road easement. Summit witness Eric Schovanec testified that “Permanent access roads will provide access to 52 [mainline valves] MLVs, 8 launcher-receiver sites, and 4 pump stations.” Summit Schovanec Direct Testimony at 9. At the evidentiary hearing, Summit witness Jimmy Powell testified that there are “approximately a hundred main line valves” and “the max spacing for main line valves will be 20 miles.” Hrg. Tr. at 1649. The physical footprint of a valve site or launcher receiver site was testified to by Mr. Powell as being a 50 X 50-foot fenced area, which equates to approximately 0.06 acres. Hrg. Tr. at 1843-1844. Summit witness Micah Rorie testified that Summit is planning 64 valve sites and requesting eminent domain for 23 of the valve sites and 34 of the launch receiver sites. Hrg. Tr. at 2878.

9. Summit witness Mr. Powell also testified that Summit proposes to construct seven pump stations to maintain operating pressure across the 5-state route with the current proposed volumes of carbon dioxide. Hrg. Tr. at 1648-1649; Powell Deposition at 73. During a discussion of potential expansion plans in Mr. Powell's deposition, he testified that the volume transported could increase by installing additional pump stations up to as many as seventeen to keep the pressure close to the operating range. Powell Deposition, pg. 72-75; *See also*, Hrg. Tr. at 1648-1649. "Worst case it would be 17 pump stations including the six or seven in Phase 1, the initial scope." Hrg. Tr. at 1648-1649. The footprint of each pump station is approximately 4-5 acres in size. Hrg. Tr. at 1839. Mr. Powell also testified that the pipe diameter would limit the capacity in those areas. Powell Deposition at 73-74. Summit likely intends to increase the normal operating pressure to increase the speed of travel and thus the volume of carbon dioxide transported if it doesn't increase the pipe size. The exact impact of adding nineteen ethanol plants on the number of pump stations required to maintain operating pressure along the proposed pipeline route is unknown.

10. During the evidentiary hearing, Summit witness Mr. Powell testified that about 3.3 million metric tons of carbon dioxide annually is associated with the twelve Iowa ethanol plants identified by Summit as participating in the carbon capture, transportation and sequestration project for which this pipeline permit is requested. Hrg. Tr. at 1634-1635. Mr. Powell later testified that "with the footprint that we have configured in this state, we could add – essentially double the number of plants with minimal impact." Hrg. Tr. at 1953.

11. Summit witness Mr. Eric Schovanec, in his deposition, explained that "So really the volume and the hydraulics dictate the pipe size. There's some expandability inherent in the system for future growth, but the volume of the CO<sub>2</sub> from the ethanol plants into the pipeline is

really dictating the pipe sizes.” Schovanec Deposition, pg. 6-7. In other words, the volume that can be transported in a pipeline is limited by the size of the pipe.

12. At the time of this testimony, Navigator had not announced the abandonment of its project and the recent announcement of the proposed expansion of the Summit pipeline had not been cemented. The scope of the proposed expansion makes it likely that some changes to the initial project are necessary. Whether the announced expansion of the pipeline will be of minimal impact or major impact to the proposed project in this docket is unknown and the Board should require Summit to update the Board on the record on the effect the recent expansion announcement will have on the proposed pipeline at issue in this docket.

13. The minimum depth of the pipeline was identified as 48 inches from the top of the pipeline. Petition, Ex. C revised at 1 (filed July 11, 2023); *See also*, Hrg. Tr. at 1687-88, 3518-19. This commitment necessitates the depth of the trench to be at least 48 inches plus the diameter of the pipe. Hrg. Tr. at 3518-19. Therefore, the size of the trench and the volume of excavated, separated, and stored soil are impacted by a change in diameter of the pipeline. *Id.*

14. On or about June 19, 2023, Summit requested informational meetings be set for Mitchell and Floyd Counties to satisfy the prerequisite for filing a petition for a new lateral to the proposed pipeline project identified in this docket. *In re: Summit Carbon Solutions LLC*, IUB Docket No. HLP-2023-0004, Request for Informational Meeting Date (filed June 19, 2023). The informational meetings were held on August 8, 2023. *In re: Summit Carbon Solutions LLC*, IUB Docket No. HLP-2023-0004, Floyd County and Mitchell County Informational Meeting Checklists (filed August 16, 2023).

15. The informational meeting request and informational meeting presentation materials identified the purpose of proposed lateral as a proposed connection to an additional

ethanol plant located near St. Ansgar to transport an additional 370,000 tons of carbon dioxide a year. *In re: Summit Carbon Solutions LLC*, IUB Docket No. HLP-2023-0004, Request for Informational Meeting Date (filed June 19, 2023). The presentation materials filed by Summit for the meetings show plans for a proposed six-inch pipeline for this lateral. *In re: Summit Carbon Solutions LLC*, IUB Docket No. HLP-2023-0004, Floyd County and Mitchell County Presentations, pg. 6 (filed July 25, 2023). A petition for a proposed lateral hazardous liquid pipeline has not been filed in Docket No. HLP-2023-0004.

16. On or about January 29, 2024, Summit announced a new partnership with POET Bioprocessing (“POET”), the world’s largest biofuel producer, to connect POET’s twelve facilities in Iowa and five facilities in South Dakota to Summit’s carbon capture, transportation, and permanent storage project. Summit projected that it would transport an additional 4.7 million metric tons of CO<sub>2</sub> annually as a result of the project. *See Summit Carbon Solutions LLC, Poet and Summit Carbon Solutions Announce Carbon Capture Partnership*, <https://summitcarbonsolutions.com/poet-and-summit-carbon-solutions-announce-carbon-capture-partnership/> (last visited February 19, 2024). *See also*, Leah Douglas, POET’s US Midwest ethanol plants to joint Summit Carbon pipeline project, Reuters, <https://www.reuters.com/sustainability/climate-energy/poets-us-midwest-ethanol-plants-join-summit-carbon-pipeline-project-2024-01-29/> (last visited February 19, 2024); Todd Neeley, Summit to Add All Poet Ethanol Plants in Iowa, South Dakota to Carbon Pipeline, <https://www.dtnpf.com/agriculture/web/ag/news/business-inputs/article/2024/01/29/summit-add-poet-ethanol-plants-iowa> (last visited February 19, 2024); Ryan Hanrahan, Summit Carbon Pipeline Adds More Plants, <https://farmpolicynews.illinois.edu/2024/01/summit-carbon-pipeline-adds-more-plants/> (last visited February 19, 2024).

17. The twelve Iowa POET ethanol plants are located in or near the Iowa cities of Arthur, Ashton, Coon Rapids, Corning, Emmetsburg, Fairbank, Gowrie, Hanlontown, Iowa Falls, Jewell, Menlo, and Shell Rock. An additional ethanol plant near Hudson, South Dakota is also proposed to connect to the Iowa portion of the pipeline in Sioux County. *See* Summit Carbon Solutions, LLC, Ethanol Plant Partners, <https://summitcarbonsolutions.com/ethanol-plant-partners/> (last visited March 4, 2024); *See also*, Att. A at 2; Att. B; Att. E; *In re: SCS Carbon Transport, LLC*, IUB Docket No. HLP-2024-0007.

18. On March 4, 2024, Summit announced Valero Renewables (“Valero”) as a new shipper for its proposed liquified carbon dioxide hazardous liquid pipeline. Summit disclosed that the additional eight facilities across four states produce 1.1 billion gallons of ethanol per year and will lead to the capture of 3.1 million metric tons of carbon dioxide annually. *See* Summit Carbon Solutions LLC, Summit Carbon Solutions Announces New Shipper for Its Carbon Capture Project, <https://summitcarbonsolutions.com/summit-carbon-solutions-announces-new-shipper-for-its-carbon-capture-project/> (last visited March 4, 2024). Five of Valero’s plants are located in or near the cities of Albert City, Charles City, Fort Dodge, Hartley, and Lakota, Iowa. *See*, Att. A at 2; Att. B; Att. E.; Joshua Haiar, Proposed carbon pipeline adds more ethanol plants as lawmakers debate regulations, Iowa Capital Dispatch, (March 4, 2024) <https://iowacapitaldispatch.com/2024/03/04/proposed-carbon-pipeline-adds-more-ethanol-plants-as-lawmakers-debate-regulations/> (last visited march 5, 2024); Donelle Eller, Valero Energy Corp joins Summit’s \$8B pipeline after Navigator kills its own project, Des Moines Register, (March 4, 2024), <https://www.desmoinesregister.com/story/money/agriculture/2024/03/04/summit-carbon-solutions-adds-valero-energy-to-carbon-capture-pipeline-after-navigator-exit/72837527007/> (last

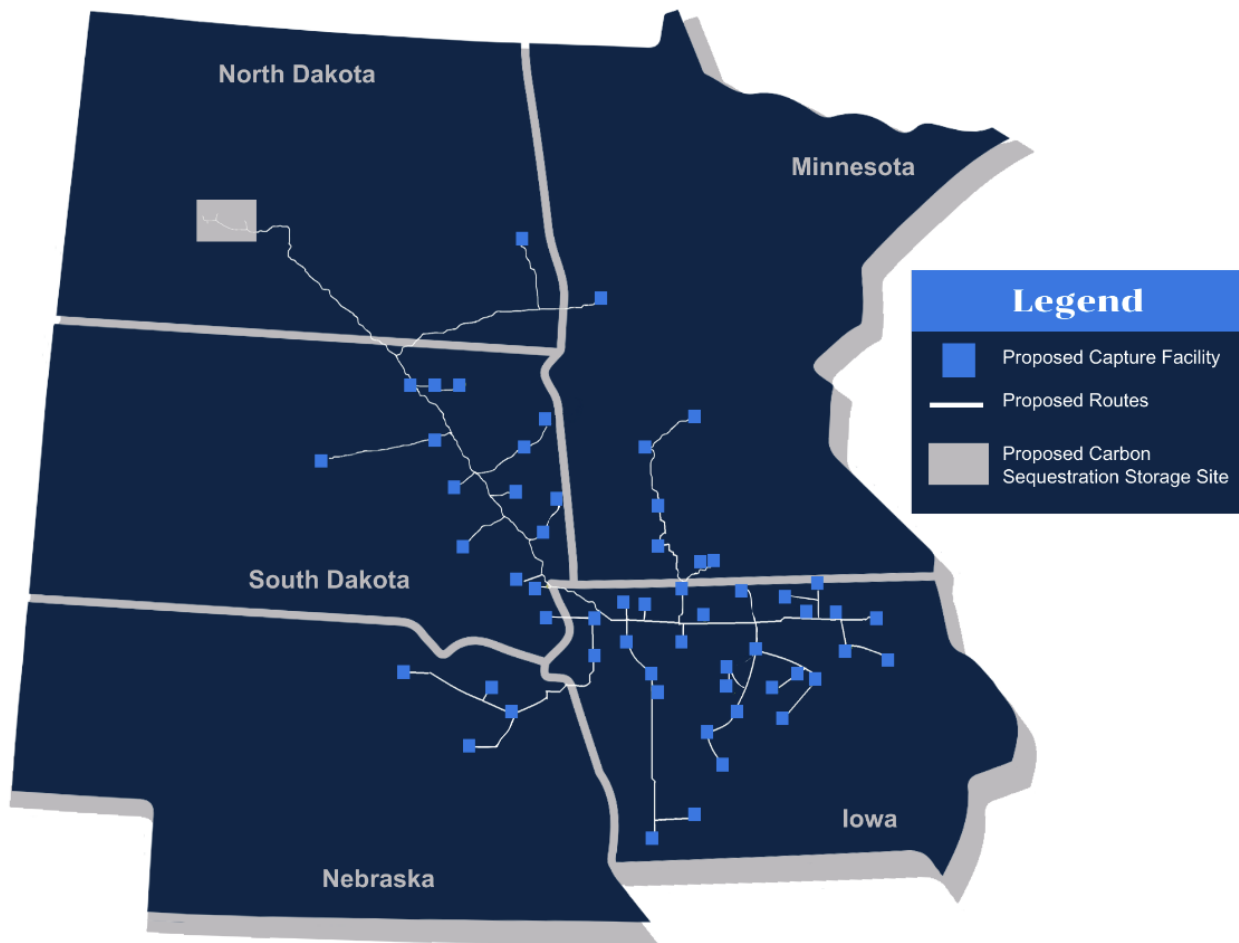
visited March 4, 2024) ; Erin Jordan, Valero, with five Iowa ethanol plants, joins Summit's proposed CO2 pipeline, The Gazette (March 4, 2024),

<https://www.thegazette.com/energy/valero-with-five-iowa-ethanol-plants-joins-summits-proposed-co2-pipeline/> (last visited March 4, 2024).

19. Summit subsequently updated its website to include an updated proposed route map for the additional lateral pipelines to add both the Valero and POET ethanol plants as shown below in figure 1. Its website also includes an interactive map with the GIS coordinates of the ethanol plants. See Summit Carbon Solutions, LLC, Project Footprint

<https://summitcarbonsolutions.com/project-footprint/> (last visited March 4, 2024).

**Figure 1: Summit Carbon Solutions LLC Proposed Project Footprint in March 2024**





20. In its announcement of the POET partnership, Summit stated: “Meanwhile, for the plants in Iowa, separate applications will be filed, acknowledging the unique requirements and opportunities in each state.” *See* Summit Carbon Solutions LLC, Poet and Summit Carbon Solutions Announce Carbon Capture Partnership, <https://summitcarbonsolutions.com/poet-and-summit-carbon-solutions-announce-carbon-capture-partnership/> (last visited February 19, 2024). Summit did file in fourteen separate dockets with information meeting requests for the new proposed pipeline laterals and trunks which connect to the current project under consideration by the IUB. *See also*, Donelle Eller, Valero Energy Corp joins Summit’s \$8B pipeline after Navigator kills its own project, The Des Moines Register, (March 4, 2024), <https://www.desmoinesregister.com/story/money/agriculture/2024/03/04/summit-carbon-solutions-adds-valero-energy-to-carbon-capture-pipeline-after-navigator-exit/72837527007/> (last visited March 4, 2024) (“Summit plans to apply to the Iowa Utilities Board for a permit to connect the Valero and POET ethanol plants to its pipeline.”).

21. The current project under consideration by the IUB includes twelve ethanol plants and a lateral to connect a thirteenth plant has completed separate informational meetings. Adding the five Valero plants and the thirteen POET ethanol plants, as shippers and participating plants respectively, will more than double the number of ethanol plants to thirty-one ethanol plants producing carbon dioxide for the Iowa portion of the pipeline. *See* Figure 1; Att. A at 2; Att. B; Att. E.

22. Therefore, the proposed project expansion would result in an increase to both the physical footprint of the total project and the volume of liquified carbon dioxide being transported as compared to the pipeline proposed in this docket. The scope of the change in the proposed pipeline project is both material and significant. If the entire proposed pipeline is

ultimately approved, the approximate amount of carbon dioxide transported through the main line would increase from approximately 3.3 million metric tons for the proposed project in this docket to approximately 10.1 million metric tons for the expanded project. Hrg. Tr. at 1634-1635; Att. E.

23. Further, Summit witness Mr. Powell testified during the proceeding that it intends to maintain “ten percent of the capacity of the pipeline for other shippers” to meet the common law definition of “common carrier.” Hrg. Tr. 1631-32. Other parties to the proceeding have raised the issue of whether the pipeline qualifies as a common carrier. *See In re: Summit Carbon Solutions, LLC*, IUB Docket No. HLP-2021-0001, Initial Post-Hearing Brief of the Counties, pgs. 70-71, Jorde Landowners’ Post-Hearing Opening Brief, pgs. 90-107, and Sierra Club’s Post-Hearing Brief, pgs. 10-21 (filed December 29, 2023). Summit should verify whether its representations of maintaining ten percent of the proposed pipeline’s capacity for other shippers will be true after the pipeline expansion.

24. Summit anticipated the possibility of an expansion of its proposed pipeline project in its post-hearing briefs. *In re: Summit Carbon Solutions, LLC*, IUB Docket No. HLP-2021-0001, Initial Post Hearing Brief of Summit Carbon Solutions, LLC, pg. 12, ftnt. 14 (filed December 22, 2023); *In re: Summit Carbon Solutions, LLC*, IUB Docket No. HLP-2021-0001, Post Hearing Reply Brief of Summit Carbon Solutions, LLC pg. 73 (filed January 19, 2024).

25. On March 4, 2024, SCS Carbon Transport, LLC (“SCS”), a subsidiary of Summit, filed fourteen new dockets proposing to significantly expand the pipeline proposed in this docket with 18 new trunk or lateral lines with 340.7 miles of new pipe across 22 counties (10 of which were not previously touched by the pipeline footprint in this docket). *See In re: SCS Carbon Transport LLC*, IUB Docket Nos. HLP-2024-0001 through HLP-2024-0014 (filed March 4,

2024). In its informational meeting request letter, SCS stated that it anticipates the Iowa expansion to add approximately 5.3 million metric tons of carbon dioxide to the proposed pipeline system. *Id.*

26. Summit and SCS have not identified whether any corrections or changes need to be made to their initial petition in this docket as a result of the announced expansion plans, specifically whether any changes are necessary with regard to the representations in their petition and testimony of the normal and maximum operating pressures, the diameter of the pipeline at all locations of the route, the number of pump stations, the number of valve sites, the number of launcher-receiver sites, and the anticipated carbon dioxide annual volume for its proposed project. This information is necessary for the Board in making its final decision in this docket.

27. In its post hearing brief, the Iowa Farm Bureau requests the Board require Summit to specify the size of the pipe it plans to install in each eminent domain parcel in the proposed easement to avoid the unnecessary burden on agricultural landowners of successive construction projects when smaller diameter pipe is replaced with larger diameter pipe to accommodate the expansion. *In re: Summit Carbon Solutions, LLC*, IUB Docket No. HLP-2021-0001, Opening Post-Hearing Brief of IFBF, pgs. 48-49 (filed December 29, 2023); *In re: Summit Carbon Solutions, LLC*, IUB Docket No. HLP-2021-0001, Post-Hearing Reply Brief of IFBF, pgs. 15-16 (filed January 19, 2024). Summit opposes placing this condition. *In re: Summit Carbon Solutions, LLC*, IUB Docket No. HLP-2021-0001, Post-Hearing Reply Brief of Summit Carbon Solutions, LLC, pg. 71 (filed January 19, 2024). The potential of burdening agricultural landowners with two or more construction periods and the accompanying damages and disruption has increased with Summit's recent announcements.

28. In fact, Summit expects to renegotiate voluntary easements in some of the areas where capacity is increased. Summit witness Mr. Powell in his deposition stated, “As you may or may not be aware, the easements we're executing with landowners are very specific. It will be an 8-inch pipeline or a single pipeline. Unlike many easements I'm familiar with outside of this project, it's not ambiguous. So to go back and increase capacity above what we already assumed, we have to have that conversation with not only the Utilities Board but every landowner.” Powell Deposition at 74. Impacted landowners, whether impacted by voluntary easements or eminent domain, should be notified of a change in plans to install a larger pipe from what was requested in this docket and be given the respect of being asked for consent and renegotiation. Summit should also have this conversation with the IUB before a final decision is issued in this docket so that the Board has the information necessary to make a decision.

29. The petition for a hazardous liquid pipeline permit and the petition exhibits filed by Summit Carbon Solutions, LLC for IUB consideration contains representations regarding the normal and maximum operating pressures, the diameter of the pipeline at all locations of the route, the number of pump stations, the number of valve sites, the number of launcher-receiver sites, and the anticipated carbon dioxide annual volume for its proposed project. Petition, Ex. C revised (July 11, 2023); Petition, Ex. M revised (filed July 11, 2023); Hrg. Tr. at 1649, 1841-1845, 2878. The route, which the IUB has been asked by Summit to approve, includes specific pipeline diameters in the legal description of the route. Petition, Ex. A revised (filed July 11, 2023). If the Board approves the proposed route requested by Summit and the planned expansion necessitates a change in pipeline diameter, the number of pump stations or any other change from representations made to the Board about the pipeline, Summit will have to decide to either build the pipeline as proposed in its Petition, thereby postponing or abandoning some of the

expansion plans, or submit a petition for a permit amendment prior to exercising eminent domain and beginning construction of the pipeline if the permit is granted.

30. The Board's rules at 199-7.24 require "Affidavits of witnesses who will present new evidence shall be attached to the motion [to reopen the record] and shall include an explanation of the competence of the witness to sponsor the evidence and a description of the evidence to be included in the record." Summit's witnesses who previously testified in this docket should be competent to answer the proffered questions and provide additional evidence in the record as described below. In support of this motion, Iowa Farm Bureau offers the information provided in this motion, in Dockets HLP-2023-0004, HLP-2024-0001 through HLP-2024-0014 and the attached Affidavit which includes the following:

- a. An overview map identifying the approximate location of the current shipper or participating ethanol plants, the approximate proposed pipeline diameter for the proposed route, the participating ethanol plants operated by POET, and the shipper ethanol plants operated by Valero. Att. B.
- b. The information necessary to calculate an estimate of the volume of carbon dioxide produced by each plant, including an identification of each ethanol plant and the plant's production capacity. Att. A at 2-3 and Att. E.
- c. A description of the methodology used to calculate the estimated carbon dioxide produced by the ethanol plants. Att. A at 3-4.
- d. The results of calculations showing an estimate of the annual volume of carbon dioxide produced by each ethanol plant and the estimated total volume of the carbon dioxide produced by the participating ethanol plants both before and after the announced project expansion. Att. E.

31. The Iowa Farm Bureau requests that the Board reopen the record in this docket for the following limited purposes:
- a. Admit proffered IFBF Johnson Supplemental Testimony and attachments into the record for this docket as described above and in the attached affidavit.
  - b. Require Summit to describe the likely impact of the future planned addition of the carbon dioxide produced by nineteen ethanol plants on the hazardous liquid pipeline proposed in IUB docket No. HLP-2021-0001 other than the physical addition of laterals and trunk lines to expand the route, which will be addressed in separate dockets.
  - c. Require Summit to provide the following additional information related to the proposed pipeline in this docket:
    - i. Whether the announced project expansions to include the POET and Valero ethanol plants will cause a change in the expected volume of liquified carbon dioxide to be transported through Iowa on an annual basis and to identify the amount of the newly expected volume.
    - ii. Whether the announced project expansions to include the POET and Valero ethanol plants will cause a change in the normal or maximum operating pressure of the proposed pipeline.
    - iii. Whether the announced project expansions to include the carbon dioxide from the POET and Valero ethanol plants will cause a change in the number of valve sites, launcher-receiver sites or pump stations required to be located in Iowa and whether any of these sites or stations are expected to be located on property listed in Summit's Exhibit H request.

- iv. Whether the announced project expansions to include the POET and Valero ethanol plants will cause a change in the diameter of the pipeline at any location along the proposed route as represented in Petition Exhibits A, C, M and N.
- d. Require Summit to amend those portions of the petition for its permit, as applicable, which make representations about the pipeline diameter, normal and maximum operating pressure, the number of valve sites, the number of launcher-receiver sites, the number of pump stations, and the annual volume of liquified carbon dioxide expected to be transported, and including but not limited to the Petition and Petition Exhibits A, C, M, and N.

32. In the alternative, Iowa Farm Bureau requests the IUB consider limiting its approval, if approval is granted, to the representations made in the petition and testimony including the 2,183-psig maximum operating pressure, the normal operating pressure of between 1,200 and 2,150 psig. the pipeline diameter in each location along the route as identified in the Petition Exhibits A and N, and the 3.28 million metric tons in annual volume of liquified carbon dioxide that Summit represented in its testimony. *See* Hrg. Tr. 1837. And further, prohibit the use of eminent domain for additional pump stations, launcher-receiver, or valve sites as “above ground” “appurtenant facilities” by amending paragraph i of the template easement language in Exhibit H to remove above ground appurtenant facilities from the template easement unless the above ground appurtenant facilities are specifically approved by the Board. Including these limits in the pipeline permit would require Summit to request an amendment to the petition for these significant and material changes to be considered on their own merits.

Therefore, Farm Bureau respectfully requests that the Board reopen docket HLP-2021-0001 to receive evidence regarding whether and to what extent Summit's petition must be amended to reflect and accommodate the planned expansion.

Respectfully submitted,

/s/ Christina L. Gruenhagen

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**ATTORNEYS FOR  
IOWA FARM BUREAU FEDERATION**

**CERTIFICATE OF SERVICE:**

I hereby certify that the foregoing document was electronically filed on March 14, 2024, with the Iowa Utilities Board's Electronic Filing System (EFS) which electronically serves all parties registered with EFS in this docket.

Signature: /s/ Christina Gruenhagen

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