



LIUNA!

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December 14, 2015

Executive Secretary
Iowa Utilities Board
1375 E. Court Ave., Room 69
Des Moines, IA 50319-0069

**FILED WITH
Executive Secretary
December 15, 2015
IOWA UTILITIES BOARD**

Regarding: Rock Island Clean Line, LLC's Motion to Establish
Procedural Schedule filed November 30, 2015

Dockets E-22123, E-22124, E-22125, E-22126, E-22127,
E-22128, E-22129, E-22130, E-22131, E-22132, E-22133,
E-22134, E-22135, E-22136, E-22137 and E-22138

To the Executive Secretary:

The Laborers' International Union of North America (LIUNA) is one of the largest most diverse Unions in the country, representing over 500,000 working men and women in the United States and Canada, with nearly 4000 of those workers in the State of Iowa. LIUNA members work in all manner of industries from building, industrial, and energy construction projects to the public servants who help keep our communities clean and operating.

LIUNA is pleased to submit this letter in support of the Rock Island Clean Line, LLC's ("Clean Line") Motion to Establish a Procedural Schedule as filed November 30, 2015.

LIUNA has been grateful to work with Clean Line through the development cycle of the Rock Island Clean Line Project ("the Project") and we have been strong supporters of the Project since prior to the initial application to the Board over a year ago. Hundreds of letters of support have been filed by individual Laborers. We believe Iowa and our nation need new energy infrastructure, and we support the job creation benefits that such projects bring. We had not previously chosen, however, to participate or submit any requests or arguments to the Board. Due in great part to facts that have become apparent since the prior Board procedural decisions, however, LIUNA now submits this letter.

The new facts that have become apparent since the prior Board procedural rule have come to light in the Dakota Access Pipeline proceedings (Docket HLP-2014-0001, the "Dakota Access case"), in which LIUNA has participated.

Feel the Power

The Dakota Access case, very similarly to the Clean Line case, presents a very large, linear project traversing many counties across the width of the state for a purpose that has been much debated and contested in terms of the public benefit. The proceedings, which have been conducted in the traditional Iowa aggregated fashion (parcel specific eminent domain applications considered simultaneously with the determination of public interest and route), and without any fault of the hearing officials, have clearly been unnecessarily burdensome to LIUNA and for many of the other parties involved.

LIUNA had little interest in the parcel specific condemnation proceedings, but have needed to provide counsel to be available through the entire proceeding, which was longer necessary if the hearing had been divided into two phases as Clean Line has suggested should be the case with its proceeding. The unnecessary length of that proceeding has required an inefficient use of our resources. The process required the applicant in that case to prepare an unnecessarily larger number of condemnation documents than would otherwise have been required had the need for the project and the project's eligibility for eminent domain previously been determined. Doubtless, many other parties could have saved time and expense from a shorter and more streamlined proceeding as well.

It is now apparent to LIUNA, where it previously was not, that at least in the instance of major infrastructure projects where the need for the project and the eligibility of the project for eminent domain may be open questions in the minds of many landowners along the route, a division of the proceeding into two phases would be more efficient.

We understand that the Board has denied previous motions by Clean Line that would have resulted in two separate phases as requested in Clean Line's current motion. LIUNA asks that the Board give the present motion a fresh look and recognize the important and unique nature of the Clean Line project. It would be unfortunate if the job creation that will flow from this project is lost simply due to a reluctance to modify traditional procedural processes.

Sincerely Yours,



John F. Penn
Vice President and
Regional Manager
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