

IN THE IOWA DISTRICT COURT IN AND FOR POLK COUNTY

LS POWER MIDCONTINENT, LLC and
SOUTHWEST TRANSMISSION, LLC,

Plaintiffs,

v.

THE STATE OF IOWA, IOWA UTILITIES
BOARD, GERI D. HUSER, GLEN
DICKINSON and LESLIE HICKEY,

Defendants.

Case No. CVCV060840

**MIDAMERICAN ENERGY
COMPANY'S APPLICATION TO
INTERVENE**

COMES NOW Applicant, MidAmerican Energy Company, who, in support of its application to intervene in this action, states as follows:

1. MidAmerican Energy Company ("MEC") is an Iowa-based public utility company which is subject to regulation by the Iowa Utilities Board ("IUB").
2. The Constitutional challenge raised in this action is based on newly-enacted Iowa Code §478.16.
3. Iowa Code §478.16 addresses the ability of an incumbent electric transmission owner ("IETO") to have a right of first refusal ("ROFR") to construct, own, and maintain an electric transmission line that has been approved for construction in a federally registered planning authority transmission plan and which connects to an electric transmission facility owned by the incumbent electric transmission owner. Iowa Code §478.16(2)-(3).
4. MEC is an IETO, as defined in Iowa Code §478.16(1)(c)(1), because it is a public utility that owns, operates, and maintains electric transmission lines in Iowa.
5. As an IETO under Iowa Code §478.16, MEC has an interest in the ROFR granted therein to make sure that transmission lines that connect to its facilities are properly constructed

and maintained to serve its customers.

6. Pursuant to Iowa Rule of Civil Procedure 1.407(1)(b), a party can intervene as of right when, upon timely application, the applicant claims an interest relating to the property or transaction which is the subject of the action and the applicant is so situated that the disposition of the action may as a practical matter impair or impede the applicant's ability to protect that interest, unless the applicant's interest is adequately represented by existing parties.

7. This intervention rule is remedial and should be liberally construed to reduce litigation and expeditiously determine matters. *Rick v. Boegel*, 205 N.W. 2d 713, 717 (Iowa 1973); *Schimerowski v. Iowa Beef Packers, Inc.*, 196 N.W.2d 551, 555 (Iowa 1972); *Peters v. Lyons*, 168 N.W.2d 759 (Iowa 1969); *Town of Mechanicsville v. State Appeal Board*, 253 Iowa 517, 111 N.W.2d 317 (1961).

8. To test the legal sufficiency of a motion to intervention, all allegations therein are assumed to be true. See *Rick v. Boegel*, 205 N.W. 2d at 717 (former intervention rule involved filing a petition of intervention).

9. MEC meets the four-part intervention of right test under Rule 1.407(1)(b).

10. First, this motion is timely filed because this action is in its initial stage. Suit was filed on October 14, 2020, the Defendants were all served by no later than October 28, 2020. The deadline to move or plead was November 17, 2020. A motion to dismiss is pending.

11. Second, to intervene as of right under Rule 1.407 (1)(b), the test requires 'interest,' not necessity, and neither desire, advantage nor disadvantage of plaintiff or defendant is controlling. *Schimerowski*, 196 N.W.2d at 555 ; *Price v. King*, 255 Iowa 314, 122 N.W.2d 318 (1963); see also *DuTrac Community Credit Union v. Hefel*, 893 N.W.2d 282, 289-90 (Iowa 2017) (district court's grant of intervention as a matter of right was proper where intervenor

demonstrated, among other things, that its operations and future revenue streams would be directly and negatively affected).

12. MEC, as an IETO, has a unique interest in the construction, ownership and maintenance of transmission lines that connect to its facilities which promotes its operations and revenue stream. (See Steve Rowley Affidavit attached hereto). Accordingly, MEC has the requisite interest relating to the constitutionality of Iowa Code §478.16 to intervene as of right.

13. Thirdly, MEC is so situated that the disposition of the action may as a practical matter impair or impede its ability to protect that interest. The outcome in this matter will determine if Iowa Code §478.16 is constitutional. That outcome will directly impact MEC's ability to construct, own and maintain transmission lines that connect to its facilities. If this act is deemed unconstitutional, then MEC would lose the ROFR to connect new utility lines to its facilities. Clearly, MEC's interest would be impaired and impeded by that outcome. Similarly, if the act is constitutional, MEC's rights would be protected.

14. The final element of intervention of right in Iowa is whether the applicant's interest can be adequately represented by existing parties.

15. A test to determine if representation is adequate under the intervention of right rule involves "comparing the interests of the proposed intervenor with the interests of the current parties to the action." See *Aventure Communications Technology, LLC v. Iowa Utilities Board*, 734 F. Supp 2d 636, 650 (N.D. Iowa 2010) (public utilities had sufficient interest in these proceedings to intervene as of right, where they were parties to the underlying administrative proceedings in which the challenged regulations were promulgated).¹

¹ No reported Iowa was found which analyzed this part of Rule 1.407. However, because Federal Rule 24 is substantially similar to Rule 1.407 on intervention, Iowa courts can look to federal decisions for guidance. See

16. Significantly, a party generally need only make a *minimal* showing “that representation ‘*may be*’ inadequate” to be entitled to intervene on that basis. *Aventure*, 734 F. Supp 2d at 651.

17 MEC has the practical knowledge of how transmission lines operate, the expertise to construct and maintain transmission lines, and a willingness to assume the obligations related to owning transmission lines. (See Steve Rowley Affidavit attached hereto). MEC has unique operational, competitive and financial interests regarding Iowa Code §478.16, and it can best articulate those interests.

18. Because MEC meets each of the requirements under Rule 1.407(1)(b), Rule 1.407(3) then comes into play. That rule requires that, in exercising its discretion, the court must consider whether the intervention will unduly delay or prejudice the adjudication of the original parties’ rights.

19. Given that this motion for intervention is sought at the outset of this case, the intervention certainly will not unduly delay or prejudice the adjudication of the rights of LS Power, Southwest Transmission, the IUB and other defendants.

20. As required by Rule 1.407(4), this motion is accompanied by a pleading that sets out the claim or defense for which intervention is sought. (See Proposed Answer of MEC attached hereto).

21. Alternatively, MEC seeks permission to intervene in this matter pursuant to Iowa Rule of Civil Procedure 1.407(2) because common questions of law and fact exist with its position on the constitutionality of Iowa Code §478.16 and the issues in this case.

Barnhill v. Iowa District Court for Polk County, 765 N.W.2d 267, 273 (Iowa 2009). See Rule 1.407 Official Comments (1997 amendments to R.C.P. 75 [now Rule 1.407] adopt provisions substantially similar to Rule 24, Federal Rules of Civil Procedure).

WHEREFORE, MidAmerican Energy Company requests that this court grant its motion to intervene as of right or, alternatively, for permissive intervention.

/s/Stanley J. Thompson
Stanley J. Thompson (AT0007811)
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Original E-filed.

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PROOF OF SERVICE

The undersigned certifies that the foregoing instrument was served upon all parties to the above cause to each of the attorneys of record herein at their respective addresses disclosed on the pleadings on November 17, 2020 by:

- FAX
 Hand Delivered Email
 Federal Express X Other: ECF Filing

Signature: /s/ Stanley J. Thompson

IN THE IOWA DISTRICT COURT IN AND FOR POLK COUNTY

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STATE OF IOWA)
) ss:
COUNTY OF POLK)

I, Steve Rowley, being first duly sworn on oath, do hereby depose and state:

1. I am the Transmission Development Director for MidAmerican Energy Company (“MidAmerican”), and in said position and based upon my professional experience have personal knowledge of the facts stated herein.

2. My affidavit is filed in support of MidAmerican’s Application to Intervene in this proceeding. MidAmerican is a rate-regulated public utility providing electric and gas service to customers in Iowa. MidAmerican is subject to the jurisdiction of the Iowa Utilities Board pursuant to Iowa Code section 476.1. As a rate-regulated public utility, MidAmerican rates, services, and policies are subject to review by the Iowa Utilities Board, which evaluates the reasonableness and prudence of MidAmerican’s expenses.

3. MidAmerican generates, transmits, and distributes electricity for public consumption in Iowa. For the purposes of the proposed Iowa Code section 476.18, MidAmerican meets the definition of an incumbent electric transmission owner in Iowa. MidAmerican is the

only rate-regulated public utility in Iowa that is responsible for performing all three phases of the electric delivery system: (1) providing electric distribution to Iowa customers; (2) owning, operating, and maintaining the high-voltage electric transmission lines necessary for electric service; and (3) owning and operating the electric generation facilities that produce electricity. Because MidAmerican is responsible for all three phases of electric service, it is uniquely situated to monitor, track, and plan for the long-term needs of its Iowa retail electric customers, including the need for high-voltage electric transmission lines.

4. The Midcontinent Independent System Operator, Inc. (“MISO”), is a federally registered planning authority that operates the regional transmission system and energy trading market whose footprint includes most of Iowa. MidAmerican is both a transmission owner and an energy market participant in MISO. MidAmerican is not a member of the Southwest Power Pool (“SPP”), which is the other federally registered planning authority and market that covers portions of Iowa.

5. As a MISO transmission owner, MidAmerican is a party to the MISO Transmission Owner Agreement, which obligates MidAmerican to transfer functional control of its transmission facilities to MISO. The MISO Transmission Owner Agreement also requires MidAmerican to participate in MISO’s regional transmission planning process, which identifies transmission needs and requires that transmission owners construct and operate facilities to meet those needs.

6. As a market participant, MidAmerican purchases and sells energy and ancillary services in the MISO market in order to serve its retail customer load. MISO market outcomes are closely tied to the transmission system, because grid congestion can directly affect the wholesale price of energy.

7. In particular, the MISO transmission system and the transmission planning process affect the ability of MidAmerican's customers to receive the full benefit of investments in renewable generation. MidAmerican owns several renewable electric generation facilities in Iowa. When MidAmerican's renewable generation facilities produce more electricity than MidAmerican's customers can consume, MidAmerican sells the excess electricity into the MISO energy market that directly benefits MidAmerican retail customers through revenue sharing and cost reducing mechanisms approved by state regulators.

8. When sufficient transmission capacity is unavailable because of transmission system congestion, MidAmerican's facilities are unable to deliver this energy. When MidAmerican cannot deliver the energy into the market, it cannot generate the wholesale revenues that benefit Iowa retail customers. Conversely, when MidAmerican's renewable generation facilities are generating less energy than is needed to serve retail customers, MidAmerican must purchase energy from the MISO market. Congestion on the transmission system can increase the cost of such purchases when it prevents the delivery of energy from the region's least-cost suppliers to MidAmerican.

9. Because of MidAmerican's participation in all three phases of electric service delivery, it is uniquely situated among Iowa utilities with respect to the impact of the regional transmission expansion environment on its customers. To the extent that the planning, approval or construction of necessary transmission facilities is delayed or otherwise impaired, such problems can affect MidAmerican's obligations under the Transmission Owner Agreement. As additional renewable generation facilities are built in Iowa, the likelihood and magnitude of transmission congestion increases and, thus, the economic impact of this congestion on Iowa customers also is likely to increase. To the extent MidAmerican can ensure that adequate transmission resources are

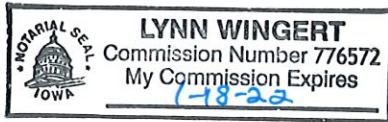
planned and built in Iowa or elsewhere in the MISO footprint, it directly benefits MidAmerican's customers through lower costs and revenue sharing mechanisms.

I certify under penalty of perjury and pursuant to the laws of the state of Iowa that the preceding is true and correct.

/s/ Steve Rowley
Steve Rowley
Transmission Development Director

Subscribed and sworn to before me this 16th day of November, 2020.

Lynn Wingert
Notary Public in and for the State of Iowa



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General Assembly: 88 (01/14/2019 - 01/10/2021) ▼

Lobbyist:

Client:

Bill number:

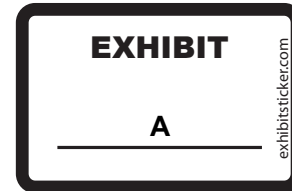
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HSB 540	5709YC	Justin Hupfer	Against	NextEra Energy	06/13/2020 04:13 PM	
HSB 540	5709YC	Brian Johnson	Against	NextEra Energy	06/13/2020 04:13 PM	
HSB 540	5709YC	Christopher Rants	Against	NextEra Energy	06/13/2020 04:13 PM	
HSB 540	5709YC	Threase Harms	For	IBEW Iowa State Conference	02/14/2020 09:45 AM	
HSB 540	5709YC	Maddie Wilcox	For	IBEW Iowa State Conference	02/14/2020 09:45 AM	
HSB 540	5709YC	Matt Eide	Against	Arconic (Formerly Alcoa)	02/10/2020 11:28 AM	
HSB 540	5709YC	Kate Walton	Against	Arconic (Formerly Alcoa)	02/10/2020 11:28 AM	

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HSB 540	5709YC	Jeffrey Boeyink	Undecided	SOO Green HVDC Link ProjectCo, LLC	02/04/2020 02:02 PM	
HSB 540	5709YC	Charlotte Eby	Undecided	SOO Green HVDC Link ProjectCo, LLC	02/04/2020 02:02 PM	
HSB 540	5709YC	Taylor Larson	Undecided	SOO Green HVDC Link ProjectCo, LLC	02/04/2020 02:02 PM	
HSB 540	5709YC	Brittany Lumley	Undecided	SOO Green HVDC Link ProjectCo, LLC	02/04/2020 02:02 PM	
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HSB 540	5709YC	Julianne Frosolone	Undecided	Iowa Federation of Labor, AFL- CIO	01/28/2020 04:53 PM	
HSB 540	5709YC	Jake Ketzner	For	Iowa Conservative Energy Forum	01/28/2020 07:52 AM	
HSB 540	5709YC	Cody Smith	For	Center for Rural Affairs	01/27/2020 04:47 PM	
HSB 540	5709YC	Jennifer Dorman	Against	LS Power Midcontinent, LLC	01/27/2020 04:01 PM	
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HSB 540	5709YC	Paula Dierenfeld	Undecided	Iowa Business Energy Coalition (IBEC)	01/27/2020 08:40 AM	
	5709YC		Undecided			

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HSB 540	5709YC	Timothy Whipple	Undecided	Iowa Association of Municipal Utilities	01/24/2020 08:15 PM	1
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HSB 540	5709YC	Onnalee Kelley	For	MidAmerican Energy Company	01/23/2020 04:55 PM	
HSB 540	5709YC	Kerry Koonce	For	Central Iowa Power Cooperative (CIPCO)	01/23/2020 02:56 PM	

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HF 2643	6419HV	Amy Campbell	Against	League of Women Voters of Iowa	06/14/2020 12:24 PM	1
HF 2643	6419HV	Anthony Carroll	Against	AARP Iowa	06/14/2020 12:24 PM	
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	6419HV		Against	Transource Energy LLC		

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