

IN THE IOWA DISTRICT COURT FOR POLK COUNTY

LS POWER MIDCONTINENT, LLC, and SOUTHWEST TRANSMISSION, LLC,)	CASE NO. CVCV060840
)	
Plaintiffs,)	
)	
vs.)	
)	
THE STATE OF IOWA, IOWA UTILITIES BOARD, GERI D. HUSER, GLEN DICKINSON and LESLIE HICKEY,)	
)	
Defendants,)	
)	
MIDAMERICA ENERGY COMPANY and ITC MIDWEST LLC,)	MOTION FOR RECONSIDERATION, ENLARGEMENT OR MODIFICATION
)	
Intervenors.)	

Plaintiffs LS Power Midcontinent, LLC and Southwest Transmission, LLC, by and through the undersigned, hereby move under Iowa Rule of Civil Procedure 1.904 for Reconsideration, Enlargement or Modification of the Court’s Order dated March 25, 2021. As detailed in the supporting Brief, filed herewith, Plaintiffs respectfully request the Court enlarge and amend its holdings to address the public importance exception to the injury-in-fact requirement of standing. Plaintiffs also request the Court reconsider its application of law to the facts, as projects are imminent in Iowa.

Respectfully submitted,

BELIN McCORMICK, P.C.

/s/ Michael R. Reck

Charles F. Becker	AT0000718
Michael R. Reck	AT0006573
Erika L. Bauer	AT0013026

666 Walnut Street, Suite 2000

Des Moines, IA 50309-3989

Telephone:(515) 283-4645

Facsimile: (515) 558-0645

Email: cfbecker@belinmccormick.com
mrreck@belinmccormick.com
elbauer@belinmccormick.com

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify on April 9, 2021, I electronically filed the foregoing with the Clerk of Court using the Iowa Electronic Document Management System. A copy was also served upon the parties to this action by:

U.S. Mail Email

David M. Ranscht
Benjamin Flickinger
Assistant Attorney General
1305 E. Walnut Street, 2nd Floor
Des Moines, IA 50319
Email: David.ranscht@ag.iowa.gov
ben.flickinger@ag.iowa.gov

Attorneys for Defendants

Stanley J. Thompson
Dentons Davis Brown PC
215 - 10th Street, Suite 1300
Des Moines, IA 50309
Email: stanthompson@dentons.com
Attorneys for Intervenor MidAmerican Energy Company

Bret A. Dublinske
Lisa M. Agrimonti
Fredrikson & Byron, P.A.
505 East Grand Avenue, Suite 200
Des Moines, IA 50309
Email: bdublinske@fredlaw.com
lagrimonti@fredlaw.com

and

Amy Monopoli
ITC Holdings Corp.
100 East Grand Avenue, Suite 230
Des Moines, IA 50309
Email: amonopoli@itctransco.com
Attorneys for Intervenor ITC Midwest LLC

Signature: /s/ Shannon Olson
L0831\0001\3763632)