

IN THE IOWA DISTRICT COURT FOR POLK COUNTY

ENVIRONMENTAL LAW AND POLICY
CENTER, IOWA ENVIRONMENTAL
COUNCIL, & SIERRA CLUB,

Petitioners,

v.

IOWA UTILITIES BOARD,

Respondent.

Case No. CVCV061992

MOTION TO INTERVENE

The Office of Consumer Advocate (OCA), a division of the Iowa Department of Justice, through its undersigned attorney, hereby moves to intervene in this judicial review proceeding, pursuant to Iowa Code section 17A.19(2) (2021).

1. The OCA was a party of record in the contested case proceeding for this matter before the Iowa Utilities Board.

2. OCA expresses its intent to join with the Petitioners in this judicial review proceeding, pursuant to Iowa Rule of Civil Procedure 1.1603(1).

3. While OCA agrees with the relief requested by Petitioners in their Petition for Judicial Review, OCA may also assert an additional ground requesting this Court order the Iowa Utilities Board to enforce the settlement agreement entered into by OCA and MidAmerican Energy Company. Petitioners declined to join in the settlement agreement.

4. OCA has been in communication with Petitioners, Respondent, and Intervenor MidAmerican Energy Company, and understands that no party objects to OCA's intervention in this matter.

WHEREFORE, OCA respectfully requests the Court grant this Motion to Intervene and allow the OCA to participate as a party in these proceedings.

Respectfully submitted,

Jennifer C. Easler
Consumer Advocate

By: /s/ Jeffrey J. Cook

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CERTIFICATE OF SERVICE

I hereby certify that July 23, 2021 the foregoing document was filed with the Clerk of Court using the EDMS system which will send electronic notice of the filing to the parties of record.

/s/ Jeffrey J. Cook

Jeffrey J. Cook