

IN THE IOWA DISTRICT COURT FOR POLK COUNTY

|                             |   |                    |
|-----------------------------|---|--------------------|
| <hr/>                       |   |                    |
| ENVIRONMENTAL LAW AND       | ) |                    |
| POLICY CENTER,              | ) |                    |
| IOWA ENVIRONMENTAL          | ) |                    |
| COUNCIL, &                  | ) |                    |
| SIERRA CLUB                 | ) |                    |
|                             | ) | Case No. CCV061992 |
| Petitioners,                | ) |                    |
|                             | ) |                    |
| v.                          | ) | RESPONSE TO MOTION |
|                             | ) | TO INTERVENE       |
| IOWA UTILITIES BOARD, STATE | ) |                    |
| OF IOWA,                    | ) |                    |
|                             | ) |                    |
| Respondent.                 | ) |                    |
| <hr/>                       |   |                    |

The Environmental Law and Policy Center, the Iowa Environmental Council, and Sierra Club (“Petitioners”) state that they do not object to the Motion to Intervene filed by MidAmerican Energy Company in the above-captioned docket on June 25, 2021. The merits of the positions taken in the Motion to Intervene can be addressed in the course of the judicial review proceedings and Petitioners do not admit their validity through this filing.

Respectfully submitted,

Date: July 6, 2021

/s/ Joshua T. Mandelbaum

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Local Counsel for Sierra Club

**CERTIFICATE OF SERVICE**

I, Michael R. Schmidt, hereby certify that the attached "PETITIONER'S ANSWER" was electronically filed with the Clerk of Court for Polk County using the EDMS system, which will send notification of such filing electronically via EDMS upon all parties of record on this 6th day of July, 2021.

/s/ Michael R. Schmidt