

IN THE IOWA SUPREME COURT
No. 21-0696

LS POWER MIDCONTINENT, LLC, and SOUTHWEST
TRANSMISSION, LLC

Plaintiffs-Appellants,

v.

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

Defendants-Appellees,
and

MIDAMERICAN ENERGY COMPANY and ITC MIDWEST, LLC,

Intervenors.

Appeal from the Iowa District Court for Polk County
The Honorable Celene Gogerty, Case No. CVCV060840

**MOTION FOR LEAVE TO FILE A BRIEF OF
AMICUS CURIAE**

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The Coalition of MISO Transmission Customers (“CMTC”) moves to file the attached brief of amicus curiae, and in support states:

1. CMTC is a continuing *ad hoc* association of large industrial and commercial end-users of electricity in the Midwest that represents the interests of industrial energy consumers before regulatory, judicial, and legislative bodies. CMTC members have facilities in the State of Iowa, employ Iowans, and contribute meaningfully to the State’s economy.

2. The outcome of this case will impact the cost of electricity paid by CMTC members both in Iowa and throughout the electricity grid operated by the Midcontinent Independent System Operator, Inc. (“MISO”), a regional transmission organization (“RTO”) regulated by the Federal Energy Regulatory Commission (“FERC”). MISO coordinates, controls, and monitors electric transmission systems across 15 states and the province of Manitoba. Accordingly, the amicus has a significant interest in the outcome of this case and the Court’s ruling. This amicus curiae brief will assist the Court in resolving the issues presented and

understanding the economic impact on large energy users in the State of Iowa and surrounding states.

3. Accordingly, CMTC is conditionally filing its brief with this motion for leave pursuant to Iowa Rule of Appellate Procedure 6.906(1).

THEREFORE, the Coalition of MISO Transmission Customers respectfully requests leave to file the attached brief of amicus curiae.

Respectfully submitted,
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PROOF OF SERVICE AND CERTIFICATE OF FILING

I hereby certify that on September 30, 2021, I electronically filed the foregoing document with the Clerk of Court using the Iowa Electronic Document Management System with a copy being sent via electronic notice to counsel for record.

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