

IN THE IOWA DISTRICT COURT FOR POLK COUNTY

TOM ROBINSON, LAURA ROBINSON,
MARTIN ROBINSON, AND PAULA
ROBINSON,

Petitioners,

v.

IOWA UTILITIES BOARD,

Respondent.

Case No. CVCV062986

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 is tasked with appearing “for all consumers generally and the public generally in all actions instituted in any state or federal court which involve the validity of a rule, regulation or order of the utilities board.” Iowa Code § 475A.2(2) (2021).

2. The OCA acts “as attorney for and represent[s] all consumers generally and the public generally in proceedings before federal and state agencies and related judicial review proceedings and appeals, at the discretion of the consumer advocate.” Iowa Code § 475A.2(5).

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

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

5. The OCA’s interest in representing all consumers and the public generally is not adequately represented by the existing parties. The OCA is the only party that can adequately represent this interest.

6. No party to this action will be prejudiced by the intervention of the OCA.

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/ Jennifer L. Johnson

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CERTIFICATE OF SERVICE

I hereby certify that January 13, 2022, 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/ Jennifer L. Johnson

Jennifer L. Johnson