

**April 08, 2014**

**STATE OF IOWA  
BEFORE THE IOWA UTILITIES BOARD**

**IOWA UTILITIES BOARD**

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**IN RE:** )  
 )  
**MIDAMERICAN ENERGY COMPANY** ) **DOCKET NO. EPB-2014-0156**  
 )  
 ) **PETITION TO INTERVENE**  
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Environmental Law & Policy Center and Iowa Environmental Council (“Environmental Intervenors”) request intervention in this matter pursuant to 199 Iowa Administrative Code § 7.13. In support of their petition, Environmental Intervenors state:

1. Environmental Law & Policy Center (ELPC) is a non-profit corporation. ELPC has an office in Des Moines and members who reside in the State of Iowa. ELPC’s goals include promoting clean energy, clean air, and clean water. ELPC has advocated for policies and practices that facilitate the efficient reduction of emissions to make our air and water cleaner including increased energy efficiency and renewable energy development. ELPC has invested significant time and resources into promoting clean air, clean water and clean energy in Iowa and nine other states in the Midwest.

2. Iowa Environmental Council (IEC) is a non-profit corporation organized under Iowa law. IEC is a broad-based environmental policy organization with a mission to create a safe, healthy environment, and sustainable future for Iowa. IEC represents a broad coalition of Iowans including over 70 diverse member and cooperator organizations ranging from agricultural, conservation, and public health organizations, to educational institutions, business associations, and churches, along with hundreds of individual members. IEC’s work focuses on clean water, clean air, conservation, and clean energy.

3. On April 1, 2014, MidAmerican Energy Company (MidAmerican) filed with the Iowa Utilities Board (IUB) its proposed Electric Emissions Plan and Budget pursuant to Iowa Code § 476.6(21). The Emissions Plan and Budget addresses near-term compliance activities and MidAmerican's long-term environmental compliance plan including MidAmerican's understanding of current and emerging compliance requirements that will impact MidAmerican's generating units and MidAmerican's plan to meet those requirements.

5. ELPC and IEC (Environmental Intervenors) have a unique interest in protecting the environment, as well as holding down the cost of electricity for consumers. Environmental Intervenors have an interest in effective environmental compliance that appropriately considers and implements all options that reduce emissions while maintaining the reliability and affordability of our electric generation system.

6. Environmental Intervenors are reviewing MidAmerican's filing and analyzing the material facts and law at issue in this proceeding. Environmental Intervenors currently do not have access to any materials deemed confidential by MidAmerican and cannot fully evaluate the filing at this time.

7. Environmental Intervenors intend to monitor the proceeding, and based on our review of the filings, Environmental Intervenors may conduct discovery, submit direct testimony and exhibits, participate in hearings, and cross-examine witnesses.

8. Environmental Intervenors will be represented in this docket by the Environmental Law & Policy Center and communications concerning the petition should be directed to ELPC at its Iowa office. Joshua T. Mandelbaum is a resident attorney licensed to practice in Iowa and works out of ELPC's Des Moines office.

WHEREFORE, Environmental Law & Policy Center and Iowa Environmental Council  
request leave to intervene and be treated as a party to the proceeding.

Respectfully submitted,

/s/ Joshua Mandelbaum  
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