

**EXHIBIT D**  
**STATE OF IOWA**  
**DEPARTMENT OF COMMERCE**  
**UTILITIES BOARD**  
**AFFIDAVIT**

**STATE OF IOWA**            )  
  )**SS:**  
**COUNTY OF LINN**         )

I, Justin Jorgensen, being first duly sworn on oath do hereby depose and state that I am employed by ITC Holdings Corporation (“ITC”) as a Transmission Planning Engineer. My business address is 123 5th Street S.E., Cedar Rapids, Iowa 52401. I primarily plan transmission projects for ITC Midwest LLC (“ITC Midwest”), a wholly owned subsidiary of ITC.

I do further state that ITC Midwest holds itself out to serve all applicants for its service pursuant to its rules, regulations and rates in the urban and rural areas within which it is franchised and operates.

ITC Midwest is subject to the jurisdiction of the Utilities Division of the Iowa Department of Commerce over the issuance, extension, and amendment of electric transmission line franchises and its rules and regulations concerning the safety of its customers, employees, and the public.

I do hereby state and affirm that this Petition requests an Amendment of Franchise to rebuild a 36,230V maximum (34,500V nominal) electric transmission line, with mileage as indicated in the Petition, to 72,500V maximum (69,000V nominal) transmission line standards in Linn County, Iowa. Construction to 69,000V nominal standards is in preparation for future operation at 69,000V nominal voltage. Initial operation after rebuild will be at 34,500V nominal voltage. Operation at 69,000V nominal voltage will not occur until Linn County Rural Electric Cooperative and Interstate Power and Light Company have made the necessary changes to their connected equipment. This is expected to occur in three to four years. The transmission line will be located primarily in public right of way in Linn County, Iowa, as described in Exhibit A, shown upon the route map designated as Exhibit B, and constructed in general accordance with the Typical Engineering Specifications designated as Exhibit C, all of which are attached hereto and made a part hereof. The line within this petition has been previously franchised as follows:

<b>Docket:</b>	<b>E-20994</b>
<b>Franchise No.:</b>	<b>16945</b>
<b>County:</b>	<b>Linn</b>
<b>Issued:</b>	<b>July 19, 1996</b>
<b>Granted to:</b>	<b>IES Utilities, Inc.</b>

**RECEIVED**  
**October 1, 2012**  
**E-20994**  
**(Amendment No. 11)**

This transmission line is being rebuilt as part of a comprehensive plan to upgrade the outdated 34,500V nominal transmission system to a modern 69,000V nominal transmission system to better serve area load during normal and contingency operation. ITC Midwest is filing this petition and accompanying exhibits under the abbreviated franchise process as codified by the 2009 Iowa Acts, Senate File 279 [Iowa Code supplement section 478.1(5)] and implemented by 199 Iowa Administrative Code Chapter 11. ITC Midwest alleges that this project is eligible for the abbreviated process because:

- 1) The project consists of upgrading an existing transmission line currently operating at 34.5 kV to 69 kV standards.
- 2) The upgraded line will be built on substantially the same right-of-way as the existing 34.5 kV line and new or additional interests in new private right-of-way will be less than a mile. The existing 34.5 kV line which is proposed to be upgraded to 69 kV standards is substantially on public road right-of-way.
- 3) The upgraded line will be constructed in accordance with the National Electrical Safety Code as well as the Iowa Electrical Safety Code requirements as referenced in 199 IAC 11.1(3) and 199 IAC § 25 to ensure safe clearances for the protection of property owners.
- 4) The proposed upgrade will have substantially the same effect on the underlying properties as the existing line, because the existing single wood pole structures will be replaced with new single wood pole structures (essentially a “pole for pole” rebuild).
- 5) ITC Midwest is not asking for the right of eminent domain.
- 6) Notice will be provided consistent with 199 IAC 11.5(11) in the form provided in Exhibit G to this Petition.
- 7) ITC Midwest agrees to pay all costs and expenses of the franchise proceeding.

ITC Midwest further alleges that the proposed construction serves a public use and represents a reasonable relationship to an overall plan of transmitting electricity in the public interest in Linn County, as follows:

**a. The relationship to present and future economic development of the area:**

If approved, the proposed amendment to the franchise and the resulting upgrade is believed to be adequate to serve present and most future economic development in the area based on known information.

**b. The relationship to comprehensive electric utility planning:**

The line is part of a comprehensive electric utility plan to upgrade the outdated 34,500V nominal voltage, radially operated, transmission system in Iowa to a modern, network operated, 69,000V nominal voltage transmission system.

RECEIVED  
October 1, 2012

E-20994  
(Amendment No. 11)

**c. The relationship to the needs of the public presently served and future projections based on population trends:**

The upgraded line will have the required transmission capacity to reliably serve the needs of the public presently served by the line and future projections based on population trends. When considering expected load growth, loading on this upgraded line will remain within ITC Midwest planning standard requirements.

**d. The relationship to the existing electric system and parallel existing utility routes:**

The line interconnects with existing electric utility systems in Linn County. There are no parallel existing utility routes.

**e. The relationship to any other power system planned for the future:**

Currently, ITC Midwest plans to operate this line at 69,000V nominal and network the lines between the ITC Midwest Hiawatha substation and the Central Iowa Power Cooperative Coggon substation once Interstate Power and Light Company and Linn County Rural Electric Cooperative have made the necessary upgrades to their equipment on the line.

**f. Possible use of alternative routes and methods of supply:**

Given this is an amendment to an existing transmission line, the route and method of supply are believed to be the most practical and reasonable. All alternative routes would be less practical and reasonable based upon existing circumstances.

**g. The relationship to the present and future land use and zoning ordinances:**

This construction is believed to be consistent with present and future land use. Based upon information available to it at the time of this filing, ITC Midwest does not anticipate that there will be any future ordinances which may affect the line.

**h. The inconvenience or undue injury which may result to property owners:**

ITC Midwest does not expect property owners to be inconvenienced or injured as a result of the proposed line. This line will be constructed primarily in public right-of-way. ITC Midwest will not require new or additional interests in real property for one route mile or more and, as such, no informational meeting is required nor has been conducted prior to the filing of this Petition consistent with 199 IAC 11.4(5). The line will be constructed in accordance with the National Electrical Safety Code as well as the Iowa Electrical Safety Code requirements as referenced in 199 IAC 11.1(3) and 199 IAC § 25 to ensure safe clearances for the protection of property owners.

Done at Cedar Rapids, Iowa, this 28<sup>th</sup> day of September 2012.

/s/ Justin Jorgensen

Justin Jorgensen  
Transmission Planning Engineer

Subscribed and sworn to before me by Justin Jorgensen, Transmission Planning Engineer, this 28<sup>th</sup> day of September 2012.

/s/ Jeanne Archie

Jeanne L. Archie – Notary Public  
Commission Expires: 9/30/2012