



November 23, 2015

TO: The Board

FROM: John Boorman, Interim Executive Director

SUBJECT: NOI-2015-0001 ORDER SOLICITING ADDITIONAL COMMENTS (Issued November 3, 2015)

The Iowa Wind Energy Association (IWEA) is sending this letter in response to the ORDER SOLICITING ADDITIONAL COMMENTS (Issued November 3, 2015) regarding Iowa Code Chapter 476C.

The Iowa Wind Energy Association promotes the growth and expansion of wind energy across the state of Iowa, to the benefit our economy, through creation of jobs at manufacturers, construction companies, service providers, and other small Iowa businesses. Much of this benefit is seen in the rural economy. The wind industry supported nearly 7,000 jobs in the State of Iowa this year.

The Order Soliciting Additional Comments (Issued November 3, 2015) is in regards to changing the rules for 476C eligibility. We agree it appears that several projects have common ownership beyond the LLC holding the renewable energy asset. However, our understanding is this practice was done in accordance with the direction of the legislative rules committee, the interpretation of the IUB, and set precedence.

Please understand that development of small renewable energy projects, such as those eligible under 476C, takes time and significant financial backing. That backing may only be available from investors that have the assets and determination to see the projects completed. The results, if successful, bring economic activity to the counties, cities & school districts where these projects are placed.

The proposed change in the rules will have the net effect of stopping future projects, thus reducing the growth of wind energy in the state. Members of IWEA have project plans based upon the existing implementation of 476C. We oppose these rule changes for this reason.

I thank the Board and Staff for their time.

Sincerely,  
John Boorman