

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

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<b>IN RE:</b>  <b>ROCK ISLAND CLEAN LINE LLC</b>	<b>DOCKET NOS. E-22123, E-22124, E-22125, E-22126, E-22127, E-22128, E-22129, E-22130, E-22131, E-22132, E-22133, E-22134, E-22135, E-22136, E-22137 and E-22138</b>
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**APPLICATION TO INTERVENE**

**COMES NOW**, Alliant Energy Corporate Services, Inc. (AECS), on behalf of Interstate Power and Light Company (IPL) and Franklin County Wind, LLC (FCW), and petitions the Iowa Utilities Board (Board) to permit IPL to intervene in this proceeding, pursuant to 199 IAC 7.13. In support of its Application, IPL states as follows:

1. IPL is an investor-owned, rate-regulated public utility, as defined in Iowa Code chapter 476, providing, *inter alia*, natural gas and electric service to Iowa retail customers pursuant to rates and tariffs filed and approved by the Board. IPL is a wholly owned subsidiary of Alliant Energy Corporation (AEC).

2. FCW is a wind farm in Franklin County, Iowa. FCW is a subsidiary of Franklin County Wind Holdings, which is a subsidiary of Heartland Energy Group, a non-regulated holding company that is a subsidiary of Alliant Energy Resources (AER). AER is a wholly owned subsidiary of AEC.

3. AECS is a service company subsidiary of AEC, and provides services to AEC and its various subsidiaries through services agreements.

4. On November 6, 2014, Rock Island Clean Line LLC (Clean Line) filed 16 petitions for electric transmission line franchises in 16 Iowa counties pursuant to Iowa Code §§ 476.53 (2015). Clean Line's November 6, 2014 filing has been docketed as Docket Nos. E-22123, E-22124, E-22125, E-22126, E-22127, E-22128, E-22129, E-22130, E-22131, E-22132, E-22133, E-22134, E-22135, E-22136, E-22137 and E-22138.

5. IPL has interests in real property and electric and natural gas facilities affected by the proposed route. In addition, the proposed route appears to go through IPL's Whispering Willow East wind farm, bringing it near several turbines. Finally, as a transmission-dependent utility, IPL has a unique interest in transmission developments and costs that could affect IPL's customers and the MISO market in which IPL participates.

6. FCW has interests in real property affected by the proposed route. In addition, the proposed route appears to go through the FCW wind farm, bringing it near several turbines.

7. IPL's and FCW's unique interests are not likely to be represented by Clean Line, the Office of Consumer Advocate (OCA) or other parties to this proceeding.

8. If its intervention is granted, AECS' participation on behalf of IPL and FCW may include monitoring the proceeding, filing prepared testimony and/or participating in contested case proceedings and filing briefs.

9. For the above reasons, AECS requests that its Application to Intervene on behalf of IPL and FCW be granted by the Board so that IPL and

FCW may participate in this proceeding to the extent necessary to preserve their rights and interests.

**WHEREFORE**, Alliant Energy Corporate Services, Inc. requests that the Board grant its Application to Intervene on behalf of Interstate Power and Light Company and Franklin County Wind, LLC, in the above-captioned proceeding.

Dated this 6<sup>th</sup> day of July, 2016.

Respectfully submitted,

**INTERSTATE POWER AND LIGHT COMPANY**

By /s/ Samantha C. Norris

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