STATE OF IOWA

BEFORE THE IOWA UTILITIES BOARD

IN RE:	)	
	)	**DOCKET NO. E-22386**
ITC MIDWEST LLC AND DAIRYLAND POWER COOPERATIVE	)	
	)	**PRE-HEARING BRIEF**
	)	
	)	

PRE-HEARING BRIEF OF CLEAN ENERGY INTERVENORS IOWA ENVIRONMENTAL COUNCIL, CLEAN GRID ALLIANCE, MINNESOTA CENTER FOR ENVIRONMENTAL ADVOCACY, AND FRESH ENERGY

The Iowa Environmental Council, Clean Grid Alliance, Minnesota Center for Environmental Advocacy, and Fresh Energy respectfully file this Pre-Hearing Brief in response to the revised petition for a transmission line filed on May 28, 2019, in this docket.

INTRODUCTION

On May 11, 2018, ITC Midwest LLC and Dairyland Power Cooperative (jointly "Petitioners") filed a petition for franchise with the Iowa Utilities Board ("IUB" or "Board") to erect, maintain, and operate an electric transmission line in Dubuque and Clayton counties. The Iowa Utilities Board staff ("IUB Staff") identified additional information that was needed from Petitioners, and Petitioners subsequently provided this information through various revisions to their Petition and its supporting Exhibits. In a Staff Report dated September 16, 2019, the IUB Staff determined the Petitioners' filings to be complete and indicated the matter could proceed to hearing.

The IUB has granted intervention rights in this docket to ten (10) individuals or organizations ("Intervenors"). These Intervenors include the following individuals: Charles Isenhart, Michael Deutmeyer, Dena M. Kurt, Linda Grice, and Chris Klopp. Mr. Isenhart and Mr.

Deutmeyer are residents of Iowa. Ms. Grice owns land in Iowa. Dena Kurt and Chris Klopp are residents of Wisconsin. Both Ms. Grice and Ms. Klopp participated in the regulatory proceeding before the Wisconsin Public Service Commission regarding the merits of the Cardinal-Hickory Creek Project to Wisconsin.

The Intervenors in this matter also include the following organizations or entities: Midcontinent Independent System Operator ("MISO"), Iowa Environmental Council ("IEC"), Clean Grid Alliance ("CGA"), Fresh Energy, and Minnesota Center for Environmental Advocacy ("MCEA"). The organizations IEC, CGA, Fresh Energy, and MCEA have consolidated their interventions and are appearing collectively as the Clean Energy Intervenors or "CEIs."

The procedural schedule in this matter was set by Order of the IUB dated April 29, 2019. Direct pre-hearing testimony from Petitioners and Intervenors supporting the Petition was filed on September 27, 2019. This included testimony from witnesses for ITC Midwest LLC, Dairyland Power Cooperative, MISO, and CEIs. Reply testimony from the Office of Consumer Advocate ("OCA") and Intervenors opposing the Petition was due on October 31, 2019. The only testimony filed was that of OCA. Intervenor Chris Klopp filed her reply testimony late on November 4, 2019. A subsequent Motion to Strike Ms. Klopp's testimony was filed by the Petitioners, and a ruling on that Motion has not yet been made. Rebuttal testimony of Petitioners and Intervenors supporting the Petition was filed on November 15, 2019, by Petitioners, MISO, and CEIs.

Pre-Hearing briefs are due in this matter on November 21, 2019, and the matter is set to come before the IUB for hearing on December 10-12, 2019.

ARGUMENT

I. PETITIONERS HAVE MET THE LEGAL REQUIREMENTS UNDER IOWA CODE.

To grant a franchise, the Board must find the line is "necessary to serve a public use." (Iowa Code § 478.4.) Transmitting electricity to the public has long been identified as a public use. (*Vittetoe v. Iowa Southern Utilities Company*, 123 N.W.2d 878, 880 (Iowa 1963).) Similarly, necessity has long been held to be a reasonable necessity, rather than an absolute necessity. (*Id.* at 881.)

Iowa Code further requires that any franchise for electric transmission "represent[] a reasonable relationship to an overall plan of transmitting electricity in the public interest" and provides criteria to support that conclusion. (Iowa Code § 478.3(2).) Among other things, a project that bears a reasonable relationship to an overall plan of transmitting electricity that is in the public interest is one that has a relationship to comprehensive electric utility planning, serves the needs of the public presently and in the future, and bears a relationship to the existing electric utility system and routes. (Iowa Code § 478.3(2)(a).)

The Cardinal-Hickory Creek Project ("the Project" or "CHC") was designed through an innovative process conducted by MISO and its stakeholders. This process sought to solve the emerging needs of the regional transmission system in a way that was the most economic, complimented and improved existing infrastructure, and simultaneously provided other critically needed grid services. The result of this process—the Multi Value Project Portfolio ("MVP Portfolio" or "Portfolio")—is an example of some of the most comprehensive electric utility planning in recent years. As part of this Portfolio, the Project will achieve benefits to the public by providing reliability benefits, economic benefits, and clean energy benefits in excess of its costs; encouraging economic development in Iowa; supporting comprehensive electric utility planning;

complementing the existing system and routes; and supporting the planned power system. The Project also achieves environmental benefits by using the best route and remaining consistent with existing land use while minimizing landowner impacts. For these reasons, discussed in more detail below, the CHC Project is necessary to serve a public use and represents a reasonable relationship to an overall plan of transmitting electricity in the public interest.

A. Constructing the Cardinal-Hickory Creek Line Provides Benefits to Iowans.

The MVP Portfolio is a comprehensive plan of seventeen new transmission lines that will economically and reliably deliver wind energy to meet future demands in Iowa and the MISO footprint. It is a strategic expansion of the existing transmission system to bring value to the entire MISO system after evaluating local and regional reliability and congestion issues. (MISO Ellis Direct Exhibit 1 at 9.) The creation of this comprehensive plan began as a multi-state effort that was initially launched by the governors of Iowa, Wisconsin, Minnesota, North Dakota, and South Dakota. (ITC Midwest Petersen Direct at 4.) MISO began by evaluating the current transmission system and then identifying the additional transmission that would be needed effectively and reliably deliver the dramatic expansion of renewable generation forecasted to meet state-adopted renewable portfolio standards ("RPSs"). Recognizing that the current transmission system could not possibly accommodate this growth, MISO and the transmission owners in the MISO footprint identified potential transmission expansions that would be needed to address this growth. (MISO Ellis Direct at 18; CEI Goggin Direct at 3.) MISO's approach considered potential future deficiencies in the grid and infrastructure, so that the public would not be harmed by actual deficiencies that would interfere with reliable electric service. Taking a regional approach to this problem was necessary for an "overall plan of transmitting electricity," as provided in Iowa Code

section 478.3, because of the level of complexity and regional implications of any decision. (*See* MISO Ellis Direct at 49.)

The potential transmission expansions that were identified were then extensively studied through the MISO study process. (MISO Ellis Direct at 21.) This process was open and transparent. It required input from stakeholders including consumer advocates, end use customers, environmental organizations, state regulatory authorities, and transmission owners. (ITC Midwest Eddy Direct at 9-10.) Over 200 public stakeholder meetings were held as part of this process. (MISO Ellis Direct at 19-20.)

Ultimately, this process identified seventeen transmission lines, including Cardinal-Hickory Creek, that met the stringent criteria required to be designated as an MVP Project. To make the final cut and receive the MVP designation, these seventeen lines had to, among other things, have financially quantifiable benefits *in excess of their costs*. (MISO Ellis Direct 18.) Collectively, the seventeen transmission lines that qualified for the MVP designation were approved by MISO in 2011 and became known thereafter as the MVP Portfolio. Each project that was ultimately selected for the Portfolio was chosen because it was a necessary component of the Portfolio that provided *independent* value to the overall goals of the Portfolio—line segments without independent value were not included. (MISO Ellis Direct at 18, 22.)

The Portfolio was purposefully designed to serve the transmission system holistically. The seventeen lines chosen provided the necessary infrastructure required to meet the forecasted influx of renewable energy, but did it in a way that most efficiently utilized the existing system while proving a myriad of other benefits. (MISO Ellis Direct at 22.) These projects were created to be "no regrets" projects—ones that provided benefits across a number of possible future scenarios. (MISO Ellis Direct at 9.)

Since 2011, ongoing reviews of the MVP Portfolio have confirmed the continued need for the MVP Portfolio, and the significant benefits the Portfolio will provide. For example, the 2017 Triennial Review of the Portfolio showed that the Portfolio's benefits to Iowa are still 2-4 times the cost. (Goggin Direct at 9.) Additionally, the ongoing studies show the growth of wind generation has already greatly exceeded the level that MISO predicted would occur when it determined the MVP Projects were needed. (CEI Goggin Direct at 2.) Wind deployment is only expected to increase—continuing to accelerate as wind costs decline. (CEI Goggin Direct at 11.) As a result, the benefits of, and need for, the Cardinal-Hickory Creek Project are even greater than they were when MISO originally created the MVP Portfolio. (CEI Goggin Direct at 9-10.)

As an MVP, Cardinal-Hickory Creek Project will serve the needs of the public presently and in the future by providing a wide range of benefits, including improving electric transmission reliability, providing economic benefits, and providing greater access to renewable generation, notably wind energy.

With respect to reliability, MISO reliability analyses identified numerous system reliability issues that will occur on the system in the future if the CHC Project is not completed. (MISO Ellis Direct at 26.) For example, the CHC Project alleviates thermal constraints and overloads on existing transmission lines, reduces loadings on 56 highly-loaded system elements, relieves contingency issues, and increases transfer capability before voltage collapse. (MISO Ellis Direct at 29-30.) The CHC Project addresses these reliability problems by providing an additional transmission path that strengthens the overall transmission system and increases its ability to perform under a variety of conditions. (MISO Ellis Direct at 26-27.)

The Cardinal-Hickory Creek Project also has significant economic benefits. Transmission in general protects consumers from many types of uncertainty that affect the power system because it provides greater ability to shift from one form of generation to another when fuel prices fluctuate,

generators are added or retired, or electricity demand changes. (CEI Goggin Direct at 9.) The CHC Project also provides economic benefits by reducing transmission congestion and current wind curtailment. (CEI Goggin Direct at 15.) This provides Iowa and regional electricity customers with access to lower-cost wind energy by allowing more customers to access some of the least expensive wind resources in the MISO footprint. (CEI Goggin Direct at 13.) Presently, transmission congestion in southern Wisconsin is significantly limiting the delivery of low-cost energy across MISO and creating price volatility. (CEI Goggin Direct at 16.)

Additionally, the CHC Project facilitates greater development and access to renewable generation. The addition of the MVP Portfolio of transmission lines will enable 53 million megawatt hours of wind energy annually through 2031. (MISO Ellis Direct at 47-48.) The completion of the CHC Project alone is already a condition of full interconnection service to 29 generating units totaling approximately 5.3 gigawatts of generation in the portion of MISO located within or electrically close to Iowa. (MISO Ellis Direct at 10, 33.) And these numbers only reflect projects with executed interconnection agreements. (MISO Ellis Direct at 33.) For projects that are still in the interconnection study process, there are more than 194 new generators whose full interconnection is conditioned on the CHC Project. (MISO Ellis Direct at 33; CEI Craven Rebuttal at 5 and CEI Craven Direct at 6 (which includes projects in Iowa).) For the many projects in the MISO queue that have the Cardinal-Hickory Creek Project as a contingent transmission facility, failure to build the CHC Project would require MISO to restudy all such units, and would likely require restudy of each of the ongoing queue studies in the MISO West, East-12 ATC, and Central Regions. (CEI Craven Direct at 8.) The result could be operating limits, decreasing the level of interconnection, or withdrawal of these projects altogether. (ITC Midwest Petersen Direct at 5.)

Access to renewable generation is another critical benefit of the Cardinal-Hickory Creek Project. Wind generation tends to be located in areas of superior wind quality, like the areas to the

west of the Mississippi River. (MISO Ellis Direct at 38.) Iowa, Minnesota, North Dakota, and South Dakota possess some of the best wind resources in the country which are significantly more productive than even the best wind resources farther east in MISO. (CEI Goggin Direct at 12.) The MVP Portfolio in general, and the CHC Project in particular, allow for the high quality wind in these western areas—including Iowa—to reach areas with lesser wind resources. This, in turn, makes it possible for states across the region to meet their RPS requirements. (MISO Ellis Direct at 38.) For Iowa, the Project will be the first 345 kV connection between Iowa and Wisconsin and only the fourth connection from Iowa to the east at this voltage. (ITC Midwest Petersen at 4.) It will add approximately 1,382 MW of incremental transfer capability between Iowa and Wisconsin, allowing generation to then go east toward Milwaukee or south toward Chicago. (ITC Midwest Eddy Direct at 18; CEI Goggin Direct at 7.) As such, it will be an important outlet for electricity generated in Iowa, thereby reducing curtailment of Iowa generators while simultaneously allowing for greater deployment of wind energy to customers to the east (ITC Midwest Petersen Direct at 4-5; CEI Goggin Direct at 7.)

Finally, because the line supports and fosters clean, renewable energy, it has significant environmental benefits as well. MISO's 2017 MVP Triennial Review found that the MVP Portfolio as a whole reduces carbon emissions by 13-21 million tons annually. (CEI Goggin Direct at 22.) The Cardinal-Hickory Creek Project alone is expected to enable sufficient wind deployment to displace 4,090,920 tons of carbon dioxide. (CEI Goggin Direct at 24.) This reduction in greenhouse gas emissions will directly benefit Iowa's environment and public health. (CEI Goggin Direct at 24.)

The goals of the MVP Portfolio and the process used to create it reveal that the MVP lines, including the CHC Project, are the very definition of an overall plan of transmitting electricity in the public interest. The MVP process considered regional needs, evaluated how best to achieve

them, and set about implementing them for the benefit of everyone in the region while considering the breadth of likely future scenarios. This Board previously found that other projects within the MVP Portfolio were necessary to serve a public use and in the public interest. (See Docket No. E-22103 (consolidated) (MVP 3), Docket No. E-22116 (consolidated) (MVP 4) and Docket No. E-22269 (consolidated) (MVP 7).) The CHC Project followed the same process and provides the same level of benefit as the previous MVP lines. This process satisfies many of the requirements of Iowa Code section 478.3(2) with respect to electric utility planning, the needs of present and future populations, the existing electric utility systems, other power systems, and alternative methods of supply. (*See* Iowa Code § 478.3(2)(a) items 1-6.)

B. The Proposed Route is the Best Alternative.

In addition to the benefits of the Project outlined above, the proposed route of the Project is also in the public interest because it substantially relies on existing rights-of-way ("ROWs"), has minimal environmental impacts, and ensures safe construction.

Iowa encourages transmission lines to follow existing transmission and ROW corridors. Iowa Code § 478.3(2)(a)(4); 199 Iowa Admin. Code 11.1(7.) As noted by CEI Witness Baer, the overall proposed route uses primarily existing ROW in this case. (Baer Direct at 8.) The Iowa portion of the route does not rely exclusively on existing ROW, but ITC used a reasonable approach to minimize landowner interference. (*See* Middleton Direct at 11-14.) The result is a route that has a relatively short path while meeting the safety and reliability needs of the project, and relies on existing transmission routes where possible. (Middleton Direct at 11-14.)

A primary concern during the environmental review for the project was the potential impact to the Upper Mississippi National Wildlife and Fish Refuge ("Refuge"). (See Middleton Rebuttal Exhibits 4-7.) ITC worked with the U.S. Fish and Wildlife Service to identify an acceptable route

through the Refuge. (Middleton Direct at 12.) CEI Witness Baer has studied the Mississippi River crossing and concluded that the best crossing point is the one selected by Petitioners. (Baer Direct at 6.) CEI Witness Baer personally visited each of the potential crossing points to evaluate the options. (Baer Direct at 6.) He concluded that "co-locating with an existing transmission line would best minimize environmental impacts," and that crossing in the area of "a parking lot, access road to the parking lot, a ferry landing, and an agricultural field" would be more compatible than a crossing in natural areas of the refuge. (Baer Direct at 6-7.) The final EIS on the Project determined the Agency Preferred Alternative was also the same route proposed by Petitioners. (Baer Rebuttal at 3.) Moreover, the U.S. Fish and Wildlife Service has issued a draft compatibility determination for this proposed crossing. (Middleton Rebuttal Exhibit 7, Appendix J.) The result of the proposed route is limited removal of woodland and no infringement on the riparian area of the refuge. (Middleton Direct at 15-16.) Additionally, the proposed route could actually mitigate habitat fragmentation. (Baer Rebuttal at 4; Middleton Rebuttal Exhibit 4 at 126.)

The Petitioners' process for determining the route included a broad set of possible routes. (Middleton direct at 11.) ITC sought to identify alternatives that would minimize environmental and other impacts and avoid areas of conflict. (*Id.* at 11, 13; Baer Direct at 4-5.) With regard to the portions of the route outside the area of the Refuge, the selected route is one of the shorter alternatives, with fewer "heavy angles, wetlands within the [ROW], and woodland within the ROW." (Middleton Direct at 14.) This approach minimizes potential land use conflicts.

The route consideration and selection process considered potential impacts to landowners, compatibility of land uses, and numerous alternative routes. As a result, the proposed route meets the legal requirements of Iowa Code section 478.3(2)(a) while also complying with the siting rules in 199 IAC chapter 11.

II. INTERVENOR CHRIS KLOPP'S TESTIMONY SHOULD BE GIVEN NO WEIGHT.

In the event that the Board denies the Motion to Strike, the Board should give no weight to Chris Klopp's testimony and associated exhibits because they have no merit. Ms. Klopp intervened in this case as an individual to assert her personal rights. In her testimony, she goes beyond the scope of her petition to intervene. Her attempt to raise other issues has resulted in the presentation of incomplete and inaccurate information to the Board. Moreover, the conclusions Ms. Klopp draws, based largely on testimony in a Wisconsin case, have already been considered and rejected by the Public Service Commission of Wisconsin ("PSCW").

A. Ms. Klopp Has Attempted to Expand the Scope of Her Interests and Intervention.

Ms. Klopp filed a petition to intervene seeking to represent her *personal interests as a ratepayer* in Wisconsin. (Petition to Intervene (filed August 29, 2019) at 1.) In her petition, she identified concerns about local communities and health risks, as well as siting of the line near her property. (*Id.* at 2-3.) She also identified an "interest" in the thorough assessment of alternatives, but did not articulate that interest. (*Id.* at 3.) Ms. Klopp's offered testimony diverges significantly from the subject matter identified in her intervention petition, and has expanded the scope of her intervention beyond her personal interests.

For example, Ms. Klopp raised numerous technical issues regarding the proceedings before the PSCW. (Klopp Reply at 19, 23, 37-38.) The Board specifically limited this type of testimony in its order granting Ms. Klopp's intervention, in which the Board stated: "this proceeding is not a relitigation of issues outside of those relevant to the Board's franchising authority." (Order Granting Petition to Intervene (filed September 19, 2019.) Despite this clear directive from the Board, Ms. Klopp has attempted to insert testimony from the Wisconsin proceeding into this proceeding by including it as an exhibit to her testimony. (*See* Klopp Reply at 23-25, 31, 36-37,

43 citing testimony from PSCW staff member Alexander Vedvik, which was offered in the Wisconsin proceeding, and including this testimony as Exhibit 126 to Klopp's Reply.) Ms. Klopp does not work for the PSCW, did not participate in the preparation of the testimony she seeks to offer by exhibit, does not have personal knowledge of the modeling runs her testimony references, and cannot be cross-examined as to the methods, assumptions, or veracity of the modeling she is now asking this Board to consider. (*See* ITC Motion to Strike (filed November 12, 2019) at 5-8.) This testimony from Ms. Klopp is irrelevant to this Board's decision-making and is unduly prejudicial to the other parties in this docket. Additionally, the testimony exceeds the scope of the personal concerns she identified in her petition to intervene.

Furthermore, in her response to ITC's Motion to Strike, Ms. Klopp makes claims of "representing" other interests, including local governments and landowners. (Response at 8 (filed November 18, 2019).) This directly contradicts the petition Ms. Klopp filed to intervene in this case, which only identified personal interests. (Petition to Intervene (filed August 29, 2019).) The Board's Order granting Ms. Klopp the right to intervene in this case only granted intervention as an individual. (Order Granting Petition to Intervene (filed September 19, 2019).) As noted in the Board's Order on her petition, there is no registered attorney in Iowa by the name Chris Klopp. (*Id.* at 3.) It is not clear how Ms. Klopp believes she has the authority to represent the interests and perspectives of other parties in this matter.

B. Ms. Klopp Provides Incomplete Information and Misinterprets the Information She Uses.

Although Ms. Klopp relies heavily on the filings in the Wisconsin case, she does so selectively and inaccurately. As noted by the rebuttal of CEI, ITC, and MISO witnesses, Ms. Klopp ignored key facts from the Wisconsin case that were unhelpful to her position. This strategy is not benign, because unlike the PSCW, the Board does not have the full record of the PSCW case before

it. While it would not be appropriate to include the full record—each utility regulator has authority over its own state's issues—withholding the PSCW's decision that contradicts Ms. Klopp's position amounts to relying on bad law without telling the court.

Where Ms. Klopp provides her own analysis, it is fatally flawed. When relying on the modeling conducted for PSCW, she does not reveal the unrealistic underlying assumptions that were identified in the course of the case. (*See, e.g.*, MISO Ellis Rebuttal at 6.) When relying on Wisconsin testimony, she does not address the testimony that contradicted the witness's position – the very testimony that the PSCW found more reliable. (MISO Ellis Rebuttal at 9.) And finally, the failure to acknowledge or rebut the PSCW decision itself, which was available to her well before Ms. Klopp provided testimony, provides its own evidence that Ms. Klopp simply cannot rebut the conclusions of the PSCW.

Ms. Klopp also does not appear to understand the technical data she relies on and criticizes. As she has admitted, she has no formal training or expertise in modeling, understanding utility or transmission operations, grid reliability, or engineering. (ITC Motion to Strike Attachment A at 3-4.) When conducting her own analysis Ms. Klopp introduces mistakes and miscalculations that lead to inaccurate results. For example, when calculating trends for coal generation in Iowa, Ms. Klopp inappropriately accounts for the capacity factor; she inaccurately concludes that coal has remained steady and wind has minimally increased over the last decade. (Goggin Rebuttal at 1-2.) Similarly, Ms. Klopp misinterprets the results of the AVERT modeling tool created by EPA, and further misinterprets CEI Witness Goggin's statements about the use of the tool. (Goggin Rebuttal at 10.) She asserts peak demand drives the need for transmission, which is seemingly based on her own interpretation because it is without citation. However, this is contradicted by trained experts who explain why her position is inaccurate. (*Cf.* Klopp Reply at 15; Craven Rebuttal at 1; Goggin

Rebuttal at 13; Eddy Rebuttal at 7.) In short, the external testimony she relies on has already been rejected and the assertions she makes are wrong.

C. The PSCW Has Considered and Rejected Ms. Klopp's Position.

The substantive testimony and exhibits that Ms. Klopp provided rely on testimony considered by the PSCW. (*See*, *e.g.*, Klopp Reply Exs. 125, 154-158.) Ms. Klopp and numerous other parties opposed to the Project appeared before the PSCW and vigorously litigated their case in that forum. (ITC Resistance to Petition to Intervene at 1-2 (filed Sept. 5, 2019).) They introduced evidence from experts and argued alternatives to the Project. (*See* Klopp Reply Exhibit 127.) PSCW staff themselves conducted modeling and argued for alternatives. (*See* Klopp Reply Testimony at 31; Klopp Reply Testimony Ex. 126.) The PSCW considered all those positions and rejected them on the merits. (*See* MISO Eddy Rebuttal Ex. 6.)

The experts Ms. Klopp relies on from the Wisconsin case did not submit testimony in this case. They are not available to cross examine or to explain why their testimony should not have been rejected by the PSCW. Despite that, Ms. Klopp wants the Iowa Utilities Board to overlook the PSCW decision and rely on the unsubstantiated testimony as if it is fresh. Her own testimony does nothing to explain why the criticism of her position by other parties in the Wisconsin case – and repeated here – are invalid.

CONCLUSION

The process conducted by MISO, ITC, and numerous other stakeholders has produced a result that will facilitate continued growth in generation capacity in Iowa while ensuring adequate capacity to transmit that power to Wisconsin when needed. It is part of a larger plan to ensure reliable service across the MISO territory as increasing levels of renewable generation come online. Petitioners have provided the necessary showing of the issues or criteria in Iowa Code §

478.3(2)(a)(1)-(8) and no party has disputed this showing, with the exception of Witness Klopp. The alternatives proposed by Ms. Klopp are not viable, the alternative modeling she relies on is unfounded, and the Board should reject her position as unreasonable. Consequently, CEIs respectfully request that the Board grant the Petitioners' Petition for Franchise.

Respectfully submitted this 21st day of November, 2019.

/s/ Michael R. Schmidt
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CERTIFICATE OF SERVICE

I hereby certify that I have on this day had CEIs' Pre-Hearing Brief in Docket No. E-22386 electronically filed with the Iowa Utilities Board using the EFS system which will send notification of such filing (electronically) to the appropriate persons.

In addition, I hereby certify that I have on this day served CEIs' Pre-Hearing Brief in Docket No. E-22386 on the parties listed below by regular mail:

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Respectfully submitted this 21st day of November, 2019.

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