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April 28, 2017

Ms. Judi Cooper
Deputy Executive Secretary
Iowa Utilities Board
1375 East Court Avenue, RM 69
Des Moines, IA 50319-0069

RE: ITC Midwest Petition for Franchise for Electric Transmission Lines, Docket No. E-22279 and MidAmerican Energy Petitions for Franchise for Electric Transmission Lines, Docket Nos. E-22269, E-22270, E-22271

Dear Ms. Cooper:

The Iowa Environmental Council submits this letter of support regarding the petitions for electric transmission line franchises filed with the Iowa Utilities Board by ITC Midwest LLC (“ITC Midwest”) and MidAmerican Energy in the dockets E-22269, E-22270, E-22271, and E-22279.

The Iowa Environmental Council (“IEC”) is a non-profit corporation organized under Iowa law. The 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 coalition of Iowans including over 70 diverse member and partner 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, including the promotion of policies to expand clean energy and clean energy jobs.

We support the expansion of wind energy in Iowa and recognize additional transmission lines will be necessary to achieve that expansion. Iowa has significant wind energy development potential and expanding transmission infrastructure is essential to expanding wind generation over time. The 2015 Department of Energy’s *Wind Vision* study identifies benchmarks for Iowa wind development as part of a national deployment of wind to reach 20% wind by 2030 and 35% wind by 2050. In Iowa, these benchmarks are between 17,000 MW and 20,000 MW of installed wind capacity by 2030 and between 37,000 MW and 46,000 MW by 2050. Reaching these levels of wind in Iowa would contribute significant economic and environmental benefits, including job creation, consumer savings, and reduced emissions.

The *Wind Vision* report, like other studies, identifies transmission constraints as one of the primary limits on wind development, particularly in the Great Plains/Interior region that includes Iowa. Iowa is fortunate to have the transmission expansion options of the Midcontinent ISO Multi-Value Project (MVP) lines. The transmission lines proposed by ITC Midwest and MidAmerican Energy as part of the above-referenced dockets are an important part of the MVP portfolio in Iowa and in the MISO footprint. The MVP portfolio of transmission lines brings new and upgraded transmission infrastructure to areas of Iowa with an excellent wind resource and can also enable wind development in more parts of the state.

Because of the importance of expanded transmission infrastructure to growth in wind energy, we support the development of wind-related transmission lines including the MISO MVP lines. In the development of these lines, we believe there must be a balance between the environmental benefits of wind generation and the potentially adverse local environmental impacts from the needed transmission lines. With a proactive and inclusive planning, siting, and routing process, we can achieve this balance.

ITC Midwest and MidAmerican Energy have worked constructively with IEC and some of our member and partner organizations to proactively discuss and communicate siting and routing options for MVP lines and to obtain information about environment and conservation issues and priorities in the corridors for proposed lines. ITC Midwest contacted us on behalf of both itself and MidAmerican Energy regarding siting and routing for MVP 7. We worked with ITC Midwest early in the siting and routing process for the MVP 7 transmission line segments in these dockets to help inform the initial selection of routes and corridors. We continued to work with ITC Midwest as it refined the routing and siting.

The ongoing process to work on siting and routing included in-person meetings with staff from ITC Midwest and staff from IEC and member or partner organizations, including the Center for Rural Affairs, Iowa Audubon, Iowa Natural Heritage Foundation, The Nature Conservancy, Iowa Chapter of the Sierra Club, and the Environmental Law & Policy Center. In addition to meetings, ITC Midwest and the consulting firm that MidAmerican Energy and ITC Midwest retained, Power Engineers, requested written feedback on corridor maps and proposed routes from IEC and our members and partners. IEC provided that feedback and we understand that members and partners did as well.

We believe the outcome of this process improved the final route and location of the transmission line segments under review in these dockets, including enhanced use of existing transmission line corridors for MVP 7. We also appreciate ITC Midwest and MidAmerican Energy's willingness to engage proactively on siting and routing and believe the process for review and input on the transmission lines under review in these dockets continues a good foundation for constructive stakeholder input in future transmission line projects. We support the development of the transmission lines in these dockets and look forward to the additional wind generation that these transmission lines will enable.

Sincerely,

/s/ Nathaniel Baer
Energy Program Director
Iowa Environmental Council