

STATE OF IOWA  
DEPARTMENT OF COMMERCE  
UTILITIES BOARD

IN RE:  INVESTIGATION INTO A COMPREHENSIVE PLAN FOR IOWA'S TRANSMISSION GRID OF THE FUTURE	DOCKET NO. INU-2021-0001
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**ORDER INITIATING INVESTIGATION, REQUESTING COMMENTS, AND SETTING  
DATE FOR WORKSHOP**

The Utilities Board (Board) has broad general jurisdiction, which includes “general supervision of . . . all lines for the transmission, sale, and distribution of electrical current . . .” Iowa Code § 474.9. Under Iowa Code § 478.4, before issuing a franchise, the Board is required to find that a proposed transmission line, among other things, “represents a reasonable relationship to an overall plan of transmitting electricity in the public interest.” As more generation is built across Iowa, the overall plan for transmitting electricity in Iowa has become unclear.

The Board has received multiple petitions for transmission lines designed to serve a single purpose: to carry electricity from a generator to a point of interconnection with the transmission grid. It is understood that these single-purpose transmission lines are necessary to carry the electric power produced, but how single-purpose transmission lines relate to an overall plan has not been adequately addressed. The increasing prevalence of single-purpose lines in Iowa has created a spider web of lengthy transmission lines that serve a limited purpose — carrying solar and wind

DOCKET NO. INU-2021-0001

PAGE 2

energy to market — for the benefit of a limited number of Iowans, if any at all. The Board is seeking information to determine if a single-purpose transmission line extending for miles across Iowa is in the public interest. *See generally In re: Heartland Divide Wind II, LLC*, Docket No. E-22432 (petitioning for 38.88 miles of 345 kV transmission line for the purpose of interconnecting approximately 200 MW of wind generation); *In re: Silver Queen Wind Farm, LLC*, Docket No. E-22430 (petitioning for 17.96 miles of 230 kV transmission line for the purpose of interconnecting approximately 300 MW of wind generation); *In re: Heartland Divide Wind I, LLC*, Docket No. E-22384 (petitioning for 19.3 miles of 169 kV transmission line for the purpose of interconnecting approximately 103 MW of wind generation); and *In re: Turtle Creek Wind Farm, LLC*, Docket No. E-22276 (petitioning for 14.73 miles of 345 kV transmission line for the purpose of interconnecting approximately 202 MW of wind generation).

In Iowa Code § 476.53(1), Iowa's General Assembly has made it a public purpose:

to attract the development of electric power generating and transmission facilities within the state in sufficient quantity to ensure reliable electric service to Iowa consumers and provide economic benefits to the state. It is also the intent of the general assembly to encourage rate-regulated public utilities to consider altering existing generating facilities, where reasonable, to manage carbon emission intensity in order to facilitate the transition to a carbon-constrained environment.

In addition, the General Assembly has stated its intent “to encourage the development of renewable electric power generation and to encourage the use of renewable power to

DOCKET NO. INU-2021-0001

PAGE 3

meet local electric needs and the development of transmission capacity to export wind power generated in Iowa.” Iowa Code § 476.53A.

To further the statutory intent expressed in Iowa Code §§ 476.53 and 476.53A, Iowa Code § 478.3(3) was added to the criteria for determining whether a proposed transmission line represents a reasonable relationship to an overall plan for transmitting electricity in the public interest. Iowa Code § 478.3(3) states that for purposes of making this finding, “the term ‘public’ shall not be interpreted to be limited to consumers located in this state.” Based upon these statutory requirements, the Board is to determine if a proposed transmission line is necessary for public use and is a part of an overall plan of transmitting electricity in the public interest.

Recently, independent power producers and transmission owners have requested that the Board support long-range transmission planning and the proposed continued expansion of transmission within Iowa and across the MISO footprint. In addition, the Board understands that a generation mix that includes reliance on renewable energy without sufficient storage capacity requires additional transmission growth. However, generation in Iowa now exceeds the amount needed for Iowans. Iowa has become a net exporter of electric energy and the rewards of renewable energy have not led to lower energy costs. In fact, the loss of prime farmland and infringement upon landowner use and enjoyment of their land are factors that continue to be raised by local governments, landowners, and residents in Iowa. Iowa’s increased desire to reduce carbon and improve the types of generation that reduce carbon may require a different approach to transmission projects. As the Iowa energy plan recognizes, “new areas of wind . . . energy are being developed within the state, it is important to identify

DOCKET NO. INU-2021-0001

PAGE 4

areas where existing transmission and distribution capacity is limited.” The executive summary makes clear that an objective of the Iowa Energy Plan is to “[e]ncourage the prudent . . . development of energy delivery infrastructure.” While generating utilities may have their own plans for how best to serve their customers’ needs, it is difficult to discern whether there is a statewide “overall plan.” Without a clear “overall plan” in place, the Board is left to assemble Iowa’s transmission grid piecemeal, as electric companies petition for franchises one line at a time. This is an unsustainable approach for building Iowa’s transmission grid of the future.

In past cases dealing with requests for a franchise for a proposed transmission line, the Board has taken a more limited view of what constituted an overall plan. In current cases, the Board has recognized that there is no overall plan for the state of Iowa and, with the number of projected renewable generating facilities and associated transmission lines, the Board considers it part of its statutory obligation to determine if a statewide plan is feasible and, if so, what a statewide plan should include. See *Generally In re: Heartland Divide Wind II, LLC*, Docket No. E-22432, “Order Approving Electric Transmission Line Franchise, Requiring Filings, and Granting Confidentiality,” p. 23-25 (June 29, 2021).

In order to meet its obligations under Iowa Code chapter 478, the Board must gather information regarding Iowa’s transmission grid, the plans for expansion of the transmission grid, the plans for expansion of generation in Iowa, and how the plans reasonably relate to an overall plan for transmitting electricity in the public interest. For these reasons, the Board is opening Docket No. INU-2021-0001 to investigate Iowa’s

DOCKET NO. INU-2021-0001

PAGE 5

transmission grid of the future and to ensure the development of an overall plan for the state of Iowa.

The Board considers it important to include the two investor-owned transmission companies, MidAmerican Energy Company and ITC Midwest LLC, and rural electric cooperatives, municipal electric utilities, and independent power producers in the discussion. To begin the discussion, the Board requests each person that wants to participate file with the Board written comments, information in regard to their current overall plan, and proposals for a joint overall plan. The Board will then hold a workshop to receive comments and proposals for the determination of a comprehensive overall plan for transmitting electricity.

Proposals should include information regarding current numbers of interconnection points and the capacity for injection of additional generation onto Iowa's transmission grid; a description of the process for determining when expansion or upgrading of the grid is necessary, including the addition or upgrading of substations; what considerations are taken into account when determining when and where expansion or upgrading will occur; and what type of coordination is done with other transmission owners, merchant line developers, and potential future generation owners in Iowa when planning for the future of Iowa's transmission grid. In answering these questions, the needs of landowners, tenants, and local jurisdictional authorities should be taken into consideration and addressed in the companies' filings.

Once the Board has reviewed the written comments and proposals, the Board will issue an order with an agenda and information on a workshop to be held August 30, 2021. The Board encourages all interested persons to file comments and participate in

DOCKET NO. INU-2021-0001  
PAGE 6

the workshop so the Board has all perspectives on the development of an overall plan for transmitting electricity in Iowa.

**IT IS THEREFORE ORDERED:**

1. Docket No. INU-2021-0001 is opened to investigate the development of a comprehensive plan for Iowa's transmission grid of the future.
2. Comments and proposals on an overall plan for transmitting electricity in Iowa shall be filed on or before 30 days from the date of this order.
3. A workshop will be held at 9 a.m. August 30, 2021, in the Board's Hearing Room, located at 1375 E. Court Ave., Des Moines, Iowa. An agenda and information on the workshop will be provided in a subsequent order.

**UTILITIES BOARD**

**Geri Huser** Date: 2021.07.02  
13:17:59 -05'00'

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**Richard Lozier** Date: 2021.07.02  
12:46:14 -05'00'

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ATTEST:

**Anna Hyatt** Date: 2021.07.02  
14:04:18 -05'00'

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**Joshua J Byrnes** Date: 2021.07.02  
12:12:01 -05'00'

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Dated at Des Moines, Iowa, this 2nd day of July, 2021.