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IOWA DEPARTMENT OF JUSTICE
OFFICE OF THE ATTORNEY GENERAL

July 16, 2025

Kristi Onstot, Executive Secretary
Executive Council
State Capitol

Re: Retention of Special Counsel—FERC matters

Dear Kristi:

In accordance with Section 13.7(1) of the Iowa Code, our office, on behalf of the Iowa Utilities Commission, requests permission to retain special counsel. Special counsel would represent the Commission in matters relating to the Federal Energy Regulatory Commission's authority over projects approved or authorized by the Midcontinent Independent System Operator, or MISO, and how that authority and approval interacts with the Commission's authority over projects and rates in Iowa. This representation involves specialized substantive and procedural legal expertise that our office does not currently possess.

We agree with the Commission's recommendation that Dorsey & Whitney LLP serve as special counsel. We have reviewed the personnel with whom Dorsey & Whitney would staff the prospective representation and agree that they possess the necessary expertise. Dorsey & Whitney propose to represent the Commission at hourly rates for partners of up to \$765 per hour. This is commensurate with the rates necessary to retain lawyers with the appropriate experience for representation before FERC. This representation would be paid for by the Commission.

We appreciate your consideration of this request.

Sincerely,

Leif Olson
Chief Deputy Attorney General