

IN THE IOWA DISTRICT COURT FOR POLK COUNTY

<p>Swan Lake Road Farms, LLC, Petitioner, v. Iowa Utilities Commission, Respondent.</p>	<p>Case No.: CVCV068000 IUC Docket No.: E-22501 PETITIONER SWAN LAKE ROAD FARMS, LLC'S NOTICE OF ADDITIONAL AUTHORITY</p>
---	--

COMES NOW, Petitioner Swan Lake Road Farms, LLC ("SLRF"), by and through the undersigned counsel, and for its Notice of Additional Authority, states:

1. Although this case is pending before the District Court, it's posture is similar to an appeal. This filing is meant to mirror a Notice of Additional Authority contemplated by Iowa Rule of Appellate Procedure 6.908(5). That rule states:

6.908(5) Additional authorities. After briefs are filed, a party may file a notice of additional authorities not cited in the briefs. The notice must include a citation for each additional authority. A concise parenthetical accompanying each citation explaining the relevance of the additional authority may be included. No further argument may be included in the notice. If the case is set for oral argument, the party must ensure that all opposing parties are served with the notice at least seven days in advance of oral argument unless the authorities were not in existence prior to that time.

2. The new authority is *LS Power Midcontinent, LLC v. State*, No. 24-0641, --- N.W.3d ----2025 WL 1535529 (Iowa May 30, 2025) (recognition by the Supreme Court that there may be harm to Iowans arising from the cost of electric transmission projects [*see* *8] and holding that MISO's project review does not trump Iowa law by stating "We are puzzled by this argument. Our court, as already discussed, certainly has the ability to

affirm an injunction of an Iowa district court blocking parties from acting pursuant to an Iowa statute that was adopted in violation of the Iowa Constitution. MISO is a private entity and lacks the authority to tell us how to interpret and apply Iowa law.”).



By: _____
William M. Reasoner, AT0013464
DICKINSON, BRADSHAW, FOWLER & HAGEN, P.C.
801 Grand Avenue, Suite 3700
Des Moines, Iowa 50309
Telephone: (515) 243-4191
FAX: (515) 246-4550
wreasoner@dickinsonbradshaw.com

Attorneys for Petitioner Swan Lake Road Farms, LLC

Certificate of Service

I hereby certify that on June 5, 2025, I electronically filed the foregoing document with the Clerk of the Court by using the Iowa Judicial Branch electronic filing system which will send a notice of electronic filing to all parties of record.

/s/ William M. Reasoner