



Iowa Utilities Commission

Sarah M. Martz, Chair
Joshua J. Byrnes, Commissioner
Erik M. Helland, Commissioner

August 4, 2026

John Bear
Chief Executive Officer
Midcontinent Independent System Operator (MISO)
720 City Center Drive
Carmel, IN 46032

Dear Mr. Bear:

The Iowa Utilities Commission (IUC) is writing to keep MISO apprised of new administrative rules intended to mitigate potential impacts of large-scale transmission lines on landowners and agricultural producers. The rules went into effect on July 29.

The IUC has been engaged in MISO's transmission planning, cost allocation and electricity market initiatives for many years. MISO's planning process identified large-scale projects needed in Iowa to serve as an efficient backbone for the region as part of its Tranche 2.1 projects. The IUC has been monitoring MISO's competitive selection process for these projects that will determine the developers and proposed designs impacting Iowa. The 345 kV and 765 kV line projects total roughly 700 miles through the state.

The 765 kV lines represent the largest scale of transmission infrastructure ever built in our state. The decisions made by MISO in the competitive selection process directly impact the IUC's siting of transmission lines, which is governed by Iowa Code and administrative rules and will impact landowners involved in these proceedings.

As MISO is aware, the IUC maintains siting authority for electric transmission lines under Iowa Code chapter 478, which includes establishing and enforcing construction standards. We believe it is imperative for large-scale transmission projects to be designed in a manner that will help mitigate impacts on landowners and surrounding areas, thereby reducing the number of requests by companies to use eminent domain.

The IUC's new rules concern noise, electric field strength and guy wire restrictions in an effort to mitigate impacts of planned large-scale transmission projects. The rules were developed through extensive stakeholder engagement that included transmission developers, electric industry stakeholders, environmental and consumer advocates, and the Iowa Farm Bureau Federation. The new IUC rules in 199 Iowa Administrative Code chapters 11 and 25 establish three new standards for the design of projects 170 kV and above. The rules make the following changes:

- Establish an audible noise limit of 55 dBA for more than 50% of a one-hour measurement period, taken at the edge of the total combined right-of-way.

- Limit the electric field strength to no more than 6,000 volts per meter when measured one meter above the ground within the right-of-way. This has been shown to improve safety with respect to the size and scale of equipment used for row crop production and reduce impacts to livestock in pastures or barns.
- Prohibit transmission structures supported primarily by guy wires from being constructed on “crop and pasture land” unless there is an agreement with the landowner to allow them. Guy wire-supported structures rely on angled support cables anchored well beyond the base of the pole, which limits the clearance of large agricultural machinery. Guy wires are a point of contention for farmers, and including guy wires in the design makes a landowner less likely to agree to voluntary easements.

We urge MISO to evaluate proposals and their project designs with consideration of these rules. Developers were given the opportunity to plan for these standards due to MISO’s public Questions and Responses log, including a Q&A regarding the IUC’s proposed rules on December 15, 2025. Any selected developer(s) will need to comply with these new regulations as part of the IUC’s electric transmission line franchise process. Therefore, we believe that evaluating proposals according to these standards can ensure MISO’s competitive process will be effective, the most viable project will be chosen, and the final selection will be aligned with Iowa’s regulatory environment.

We appreciate your attention to these concerns and welcome continued engagement between the IUC and MISO.

Sincerely,



Sarah Martz, Chair



Joshua Byrnes, Commissioner



Erik Helland, Commissioner

CC:

Aubrey Johnson, VP of System Planning and Competitive Transmission
Jennifer Curran, Senior VP of Planning and Operations