



January 5, 2023

Iowa Utilities Board  
1375 Court Avenue  
Des Moines, IA 50319

RE: Docket No. HLP-2021-0001, Summit Carbon Solutions, LLC

Dear Iowa Utilities Board Members:

Representing nearly 7,000 members, the Iowa Corn Growers Association (ICGA) serves as the collective voice for Iowa corn farmers, advocating for agricultural issues at both the state and federal level. Iowa leads the nation in both corn and ethanol production, and as such, ICGA is well positioned to comment on the proposed projects to construct carbon capture and sequestration pipelines across Iowa, as filed with the Iowa Utilities Board.

ICGA writes to offer our support for the carbon capture and sequestration pipeline projects that are proposed to be built and eventually operated throughout Iowa. This is not a decision we take lightly, as we know that Iowa farmers have strong feelings on both sides of this issue. However, during the 2022 ICGA Annual Grassroots Summit, ICGA delegates voiced their opinions and voted to adopt the following policy resolutions:

- ICGA supports the implementation of carbon capture and sequestration pipelines to lower the carbon intensity scores of ethanol plants.
- ICGA supports the entirety of the current permitting process outlined in the Iowa Code for utility projects regulated by the Iowa Utilities Board and supports current rules for restoration of agricultural land during and after construction. We further support landowners negotiating requirements higher than state minimums on their individual property as they deem necessary.
- We support individual landowner protections at the state level with regard to windmills, solar projects, and other physical equipment placed on farmland not regulated by the Iowa Utilities Board.
- We believe any land easement taken and then abandoned, or not used for its intended purpose, should revert back to the private property owner.

ICGA's support for carbon capture and sequestration pipeline projects as well as other carbon reduction technologies is consistent with one of our highest priorities: building markets and growing demand for corn. Ethanol is a top market for corn grind, and we are always working to increase ethanol's share of the fuel tank. Ethanol is currently the most immediate and affordable low carbon fuel solution available, and while today's ethanol is nearly 50 percent lower in greenhouse gas emissions compared to gasoline, ethanol must continue lowering its carbon intensity score to remain competitive in the rapidly expanding realm of low carbon energy policies.

Carbon intensity is a measure of the rate of greenhouse gas emissions per unit of energy consumed in an activity or production process. In the context of climate discussions and low carbon energy policies, fuels with lower carbon intensity scores are favored by receiving greater incentives. Therefore, under existing low carbon fuel policies – including federal provisions enacted through the Inflation Reduction Act; state programs such as low carbon fuel standards in California, Oregon and Washington; and international approaches such as Canada’s Clean Fuel Regulations – biofuels such as corn ethanol stand to benefit significantly by lowering their carbon intensity scores.

While there are many options to lower the carbon intensity scores of corn ethanol, including adopting certain farming practices, utilizing wind and solar power, and maximizing the efficiency of ethanol plant operations, the option that offers the greatest carbon intensity reduction today is carbon capture and sequestration pipeline technology. Given this fact, it is not surprising that 34 of Iowa’s 42 ethanol plants have publicly committed to adopting carbon capture and sequestration pipeline technology from one of the three proposed projects under consideration before the Iowa Utilities Board. By utilizing carbon capture and sequestration pipeline technology, corn ethanol plants have the potential to produce a biofuel that is not only clean, more affordable, and homegrown, but also lower-carbon and better for the climate than electric vehicles.

While ICGA values the implementation of carbon capture and sequestration pipelines to lower the carbon intensity scores of ethanol plants, we also respect and fully support our members’ landowner rights and the need for proper landowner protection. Our goal with these policy changes is to put the decision-making in the hands of farmers when it comes to their land usage. By supporting the entirety of the current permitting process outlined in the Iowa Code for utility projects regulated by the Iowa Utilities Board, we set forth the precedent that both public and private entities must follow negotiation procedures that have been in place for years regarding utility projects. ICGA reiterates our longstanding position that landowners have the right to receive just compensation and participate in good-faith negotiations with any companies – including carbon capture and sequestration pipeline companies – seeking to secure easements on Iowa farmland. Similarly, ICGA encourages farmers to reach out to the pipeline companies if they have any questions and to speak with an attorney regarding any legal questions about their farm before signing any contracts.

ICGA is grateful for the opportunity to share our support for the proposed carbon capture and sequestration pipeline projects pending before the Iowa Utilities Board while also emphasizing our commitment to landowner rights for farmers. ICGA’s mission is creating opportunities for long-term Iowa corn grower profitability, and we believe the implementation of carbon capture and sequestration pipelines to lower the carbon intensity of ethanol plants is a key step in achieving our mission and preserving a bright future for increasing corn demand through Iowa ethanol production. Thank you for your consideration, and please let us know if you have any questions.

Sincerely,

/s/ Dennis Friest

Dennis Friest  
President