

BEFORE THE IOWA UTILITIES COMMISSION

IN RE:)
) Docket No. GCU-2025-0013
NEXTERA ENERGY DUANE)
ARNOLD LLC)

**REPLY TO NEXTERA’S RESPONSE TO BEYOND NUCLEAR’S PETITION
FOR INTERVENTION**

Comes now Beyond Nuclear and for Reply to NextEra’s Response to Beyond Nuclear’s Petition for Intervention, states as follows:

1. Beyond Nuclear’s Petition for Intervention contains every element necessary for intervention required by Commission Rule 7.13(3).
2. It appears that the only point raised by NextEra’s Response is the question of whether Beyond Nuclear has members in Iowa who live near the Duane Arnold Energy Center. There is no requirement in Rule 7.13(3) that an intervening organization have members in Iowa. All that is required is that the organization have an interest in the proceeding and that a decision in this proceeding will have an impact on Beyond Nuclear’s interest.
3. The Petition to Intervene clearly states Beyond Nuclear’s interest in replacing nuclear power with renewable energy. That is exactly the issue in this proceeding. And the Petition to Intervene clearly states why a decision in this proceeding will impact that interest.
4. Beyond Nuclear has been a party to proceedings in many states opposing aspects of nuclear power. In fact, Beyond Nuclear is currently engaged in litigation opposing the proposed restart of the Palisades Nuclear Plant in Michigan. The proposed restart of Palisades is the template for the proposal to restart Duane Arnold.

5. In all the years that I have litigated before the IUB and the IUC, I have never seen a prospective intervenor that had to provide identities of its members. In any event, to avoid delay, attached is the affidavit of Kevin Kamps listing Beyond Nuclear's Iowa members and their cities of residence.

6. According to Rule 7.13(5), "Leave to intervene shall generally be granted by the board [commission] or presiding officer to any person with a cognizable interest in the proceeding." So the rule favors intervention, not the attempt by NextEra to prevent intervention.

WHEREFORE, Beyond Nuclear requests that it be allowed to intervene in this proceeding.

/s/ *Wallace L. Taylor*

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