STATE OF IOWA
DEPARTMENT OF COMMERCE
IOWA UTILITIES COMMISSION

IN RE: INVESTIGATION INTO IOWA UTILITIES' SUMMER 2025 PREPAREDNESS PLANS AND GRID RESILIENCE PLANS	DOCKET NO. INU-2025-0001

IAMU MEMBER RESPONSES TO IOWA UTILITY COMMISSION QUESTIONS REGARDING WINTER 2024-25 REVIEW AND SUMMER 2025 PREPAREDNESS PLANS

COMES NOW, the Iowa Association of Municipal Utilities ("IAMU"), and submits the following information in response to the Iowa Utilities Commission's ("Commission") April 25, 2025 Order Requesting Information Regarding Summer 2025 Preparedness Plans ("Order"), and prior to the technical conference scheduled for June 3, 2025.

The Commission notes in its Order that only Iowa rate-regulated utilities are required to answer the Attachment A question, but welcomed any interested party, including other Iowa electric utilities, to file responses in the docket and/or participate in the June 3, 2025 meeting. IAMU members take seriously the subject matter of this docket and elect to participate in this docket in order to inform the Board about their review of winter operations in 2024-2025 and their summer 2025 preparedness plans.

By: /s/ *Timothy J. Whipple*
Timothy J. Whipple (AT0009263)
Ahlers & Cooney, P.C.
100 Court Avenue, Suite 600
Des Moines, IA 50309-2231
Telephone: (515) 246-0379
Email: twhipple@ahlerslaw.com

ATTORNEY FOR IOWA
ASSOCIATION OF MUNICIPAL UTILITIES

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INFORMATION SUBMITTED BY BROOKLYN MUNICIPAL UTILITIES

Winter 2024-2025 Review

1. What was your utility's experience with 2024-2025 winter operations?

Brooklyn Municipal Utilities had no problems at all with its 2024-2025 winter operations.

2. Did your utility experience any difficulty procuring generation fuel or any significant increases in purchased generation fuel prices?

Brooklyn Municipal Utilities had no problems getting fuel for its generators or with fuel prices.

3. Did your utility experience any unique event(s) that distinguished this winter's operations compared to prior winters?

Brooklyn Municipal Utilities did not experience any unique events in winter 2024-2025 compared to previous winters.

4. Did your utility experience higher or lower locational marginal prices ("LMP") compared to last winter? What will be the potential impact of the LMPs to ratepayers?

Brooklyn Municipal Utilities' LMPs in winter 2024-2025 were similar to those for the previous winter, so there was no impact to its ratepayers.

Summer 2025 Preparedness

5. Is your utility ready to reliably serve peak load for summer 2025? Provide details.

Yes, Brooklyn Municipal Utilities is ready to reliably serve peak load for summer 2025.

6. What steps has your utility taken in preparation to reliably serve peak load for summer 2025?

To reliably serve peak load for summer 2025, Brooklyn Municipal Utilities is utilizing its customers' back-up generators.

7. Are there any significant changes that have occurred over the last year that have caused revisions to your summer preparedness strategies?

There have been no significant changes over the last year that caused Brooklyn Municipal Utilities to revise its summer preparedness strategies.

8. Are there any new hazards, threats or vulnerabilities that you are concerned may affect your utility's ability to reliably serve load on peak usage days?

Brooklyn Municipal Utilities is not concerned about any new hazards, threats or vulnerabilities that may affect its ability to reliably serve load on peak usage days.

9. Does your utility have any updates to its plans for initiating and managing a systemwide load shed to protect the bulk electric system in the event of an imbalance of electricity supply and demand? If so, what are the updates?

Brooklyn Municipal Utilities has made no updates to its plans for initiating and managing a systemwide load shed to protect the bulk electric system in the event of an imbalance of electricity supply and demand.

10. Does your utility foresee any supply chain constraints affecting natural gas or coal availability? If so, what are those constraints?

Brooklyn Municipal Utilities does not foresee any supply chain constraints affecting natural gas or coal availability.

11. What can the Iowa Utilities Commission or the State of Iowa do to support the reliability and resiliency of your system?

Brooklyn Municipal Utilities has no recommendations.

12. North American Electric Reliability Corporation ("NERC") issued its 2024 Long-Term Reliability Assessment. How do you view their concerns on energy shortfalls in the MISO region?

If NERC is concerned about energy shortfalls in the MISO region, Brooklyn Municipal Utilities believes that MISO should utilize the smaller utilities that have back-up generation to help with the load.

13. How do these energy shortfall issues impact your decisions on long-term generation planning?

Brooklyn Municipal Utilities believes the smaller utilities should be able to add more generation.

INFORMATION SUBMITTED BY CITY OF AUBURN, IOWA

Winter 2024-2025 Review

1. What was your utility's experience with 2024-2025 winter operations?

The City of Auburn, Iowa ("Auburn") had normal operations in winter 2024-2025.

2. Did your utility experience any difficulty procuring generation fuel or any significant increases in purchased generation fuel prices?

Not applicable; Auburn is not a gas utility.

3. Did your utility experience any unique event(s) that distinguished this winter's operations compared to prior winters?

Auburn did not experience any unique events in winter 2024-2025 compared to previous winters.

4. Did your utility experience higher or lower locational marginal prices ("LMP") compared to last winter? What will be the potential impact of the LMPs to ratepayers?

There was no change to Auburn's LMPs in winter 2024-2025 and, as such, there will be no potential impact to ratepayers.

Summer 2025 Preparedness

5. Is your utility ready to reliably serve peak load for summer 2025? Provide details.

Yes, Auburn is ready to reliably serve peak load for summer 2025. Auburn purchases power from Western Area Power Administration ("WAPA") and Heartland Energy.

6. What steps has your utility taken in preparation to reliably serve peak load for summer 2025?

Auburn purchases its power from WAPA and Heartland Energy.

7. Are there any significant changes that have occurred over the last year that have caused revisions to your summer preparedness strategies?

No, there have been no significant changes over the last year that caused Auburn to revise its summer preparedness strategies.

8. Are there any new hazards, threats or vulnerabilities that you are concerned may affect your utility's ability to reliably serve load on peak usage days?

No, Auburn is not concerned about any new hazards, threats or vulnerabilities that may affect its ability to reliably serve load on peak usage days.

9. Does your utility have any updates to its plans for initiating and managing a systemwide load shed to protect the bulk electric system in the event of an imbalance of electricity supply and demand? If so, what are the updates?

No, Auburn has no updates to its plans for initiating and managing a systemwide load shed to protect the bulk electric system in the event of an imbalance of electricity supply and demand.

10. Does your utility foresee any supply chain constraints affecting natural gas or coal availability? If so, what are those constraints?

Not applicable; Auburn is not a gas utility.

11. What can the Iowa Utilities Commission or the State of Iowa do to support the reliability and resiliency of your system?

To support the reliability and resiliency of Auburn's system, it suggests that the Iowa Utilities Commission and the State of Iowa continue to offer grant opportunities to small towns to improve their electrical infrastructure.

12. North American Electric Reliability Corporation issued its 2024 Long-Term Reliability Assessment. How do you view their concerns on energy shortfalls in the MISO region?

Auburn has no opinion regarding NERC's 2024 Long-Term Reliability Assessment.

13. How do these energy shortfall issues impact your decisions on long-term generation planning?

Auburn purchases its power from WAPA and Heartland Energy.

INFORMATION SUBMITTED BY WOODBINE MUNICIPAL LIGHT & POWER

Winter 2024-2025 Review

1. What was your utility's experience with 2024-2025 winter operations?

Woodbine Municipal Light & Power ("WML&P") had normal winter operations in 2024-2025.

2. Did your utility experience any difficulty procuring generation fuel or any significant increases in purchased generation fuel prices?

WML&P did not have any difficulty procuring generation fuel or any significant increases in purchased generation fuel prices.

3. Did your utility experience any unique event(s) that distinguished this winter's operations compared to prior winters?

WML&P did not have any unique events in winter 2024-2025 compared to previous winters.

4. Did your utility experience higher or lower locational marginal prices ("LMP") compared to last winter? What will be the potential impact of the LMPs to ratepayers?

WML&P's LMPs in winter 2024-2025 were similar to the previous winter and, as such, there will be no potential impact of the LMPs to ratepayers.

Summer 2025 Preparedness

5. Is your utility ready to reliably serve peak load for summer 2025? Provide details.

Yes, WML&P is ready to reliably serve peak load for summer 2025. We do not anticipate any issues due to the size of the system and no added loads.

6. What steps has your utility taken in preparation to reliably serve peak load for summer 2025?

Most of WML&P's system is residential. Larger load customers do not operate during peak hours.

7. Are there any significant changes that have occurred over the last year that have caused revisions to your summer preparedness strategies?

No, there have been no significant changes over the last year that caused WML&P to revise its summer preparedness strategies.

8. Are there any new hazards, threats or vulnerabilities that you are concerned may affect your utility's ability to reliably serve load on peak usage days?

WML&P is not concerned about any new hazards, threats or vulnerabilities that may its ability to reliable serve load on peak usage days.

9. Does your utility have any updates to its plans for initiating and managing a systemwide load shed to protect the bulk electric system in the event of an imbalance of electricity supply and demand? If so, what are the updates?

No, WML&P has no updates to its plans for initiating and managing a systemwide load shed to protect the bulk electric system in the event of an imbalance of electricity supply and demand.

10. Does your utility foresee any supply chain constraints affecting natural gas or coal availability? If so, what are those constraints?

No, WML&P does not foresee any supply chain constraints affecting natural gas or coal availability.

11. What can the Iowa Utilities Commission or the State of Iowa do to support the reliability and resiliency of your system?

To support the reliability and resiliency of WML&P's system, we would like to get updates on notifications and changes from the Iowa Utilities Commission and the State of Iowa.

12. North American Electric Reliability Corporation issued its 2024 Long-Term Reliability Assessment. How do you view their concerns on energy shortfalls in the MISO region?

Not applicable; WML&P is located in the Southwest Power Pool region.

13. How do these energy shortfall issues impact your decisions on long-term generation planning?

Not applicable.

INFORMATION SUBMITTED BY CITY OF SERGEANT BLUFF, IOWA

Winter 2024-2025 Review

1. What was your utility's experience with 2024-2025 winter operations?

The City of Sergeant Bluff, Iowa ("Sergeant Bluff") had normal operations in winter 2024-2025.

2. Did your utility experience any difficulty procuring generation fuel or any significant increases in purchased generation fuel prices?

Not applicable; Sergeant Bluff is not a gas utility.

3. Did your utility experience any unique event(s) that distinguished this winter's operations compared to prior winters?

Sergeant Bluff did not experience any unique events in winter 2024-2025 compared to previous winters.

4. Did your utility experience higher or lower locational marginal prices ("LMP") compared to last winter? What will be the potential impact of the LMPs to ratepayers?

Sergeant Bluff did not have any change in LMPs in winter 2024-2025 compared to the previous winter and, as such, there will be no impact of the LMPs to ratepayers.

Summer 2025 Preparedness

5. Is your utility ready to reliably serve peak load for summer 2025? Provide details.

Yes, Sergeant Bluff is ready to reliably serve peak load for summer 2025 with load management.

6. What steps has your utility taken in preparation to reliably serve peak load for summer 2025?

To reliably serve peak load for summer 2025, Sergeant Bluff will be using a load shedding system.

7. Are there any significant changes that have occurred over the last year that have caused revisions to your summer preparedness strategies?

No, there have been no significant changes over the last year that caused Sergeant Bluff to revise its summer preparedness strategies.

8. Are there any new hazards, threats or vulnerabilities that you are concerned may affect your utility's ability to reliably serve load on peak usage days?

Sergeant Bluff is not concerned about any new hazards, threats or vulnerabilities that may its ability to reliable serve load on peak usage days.

9. Does your utility have any updates to its plans for initiating and managing a systemwide load shed to protect the bulk electric system in the event of an imbalance of electricity supply and demand? If so, what are the updates?

No, Sergeant Bluff has no updates to its plans for initiating and managing a systemwide load shed to protect the bulk electric system in the event of an imbalance of electricity supply and demand.

10. Does your utility foresee any supply chain constraints affecting natural gas or coal availability? If so, what are those constraints?

Not applicable; Sergeant Bluff is not a gas utility.

11. What can the Iowa Utilities Commission or the State of Iowa do to support the reliability and resiliency of your system?

To support the reliability and resiliency of Sergeant Bluff's system, it encourages the Iowa Utilities Commission and the State of Iowa to keep educating electric utilities.

12. North American Electric Reliability Corporation issued its 2024 Long-Term Reliability Assessment. How do you view their concerns on energy shortfalls in the MISO region?

Sergeant Bluff encourages the Iowa Utilities Commission and the State of Iowa to continue educating customers about how to save energy and adding more load management to address NERC's concerns about energy shortfalls.

13. How do these energy shortfall issues impact your decisions on long-term generation planning?

Not applicable; Sergeant Bluff is not a gas utility.

INFORMATION SUBMITTED BY BELLEVUE MUNICIPAL UTILITIES

Winter 2024-2025 Review

1. What was your utility's experience with 2024-2025 winter operations?

Bellevue Municipal Utilities had normal operations in winter 2024-2025.

2. Did your utility experience any difficulty procuring generation fuel or any significant increases in purchased generation fuel prices?

Bellevue Municipal Utilities did not experience any difficulty procuring generation fuel or any significant increases in purchased generation fuel prices.

3. Did your utility experience any unique event(s) that distinguished this winter's operations compared to prior winters?

Bellevue Municipal Utilities did not experience any unique events in winter 2024-2025 compared to previous winters.

4. Did your utility experience higher or lower locational marginal prices ("LMP") compared to last winter? What will be the potential impact of the LMPs to ratepayers?

Bellevue Municipal Utilities did not have any change in LMPs in winter 2024-2025 compared to the previous winter and, as such, there will be no impact of the LMPs to ratepayers.

Summer 2025 Preparedness

5. Is your utility ready to reliably serve peak load for summer 2025? Provide details.

Bellevue Municipal Utilities is ready to reliably serve peak load for summer 2025. Bellevue Municipal Utilities buys power from Central Iowa Power Cooperative and has generation if needed.

6. What steps has your utility taken in preparation to reliably serve peak load for summer 2025?

To reliably serve peak load for summer 2025, Bellevue Municipal Utilities maintains its generators and keeps them in great operating condition.

7. Are there any significant changes that have occurred over the last year that have caused revisions to your summer preparedness strategies?

No, there have been no significant changes over the last year that caused Bellevue Municipal Utilities to revise its summer preparedness strategies.

8. Are there any new hazards, threats or vulnerabilities that you are concerned may affect your utility's ability to reliably serve load on peak usage days?

No, Bellevue Municipal Utilities is not concerned about any new hazards, threats or vulnerabilities that may affect its ability to reliably serve load on peak usage days.

9. Does your utility have any updates to its plans for initiating and managing a systemwide load shed to protect the bulk electric system in the event of an imbalance of electricity supply and demand? If so, what are the updates?

No, Bellevue Municipal Utilities has no updates to its plans for initiating and managing a systemwide load shed to protect the bulk electric system in the event of an imbalance of electricity supply and demand.

10. Does your utility foresee any supply chain constraints affecting natural gas or coal availability? If so, what are those constraints?

Not applicable.

11. What can the Iowa Utilities Commission or the State of Iowa do to support the reliability and resiliency of your system?

To support the reliability and resiliency of Bellevue Municipal Utilities' system, it suggests that the Iowa Utilities Commission and the State of Iowa allow more commercial generating facilities for base load in Iowa.

12. North American Electric Reliability Corporation issued its 2024 Long-Term Reliability Assessment. How do you view their concerns on energy shortfalls in the MISO region?

To address NERC's concerns on energy shortfalls in the MISO region, Bellevue Municipal Utilities believes NERC needs to put a cap on data mining if there is a projected shortfall.

13. How do these energy shortfall issues impact your decisions on long-term generation planning?

Due to these energy shortfall issues, Bellevue Municipal Utilities may possibly install more generation.

INFORMATION SUBMITTED BY KEOSAUQUA LIGHT & POWER

Winter 2024-2025 Review

1. What was your utility's experience with 2024-2025 winter operations?

Keosauqua Light & Power ("KL&P") had no significant problems in winter 2024-2025.

2. Did your utility experience any difficulty procuring generation fuel or any significant increases in purchased generation fuel prices?

No, KL&P had no difficulty procuring generation fuel or any significant increases in purchased generation fuel prices.

3. Did your utility experience any unique event(s) that distinguished this winter's operations compared to prior winters?

No, KL&P did not experience any unique events in winter 2024-2025 compared to previous winters.

4. Did your utility experience higher or lower locational marginal prices ("LMP") compared to last winter? What will be the potential impact of the LMPs to ratepayers?

KL&P did not have any change in LMPs in winter 2024-2025 compared to the previous winter and, as such, there will be no impact of the LMPs to ratepayers.

Summer 2025 Preparedness

5. Is your utility ready to reliably serve peak load for summer 2025? Provide details.

Yes, KL&P is ready to reliably serve peak load for summer 2025.

6. What steps has your utility taken in preparation to reliably serve peak load for summer 2025?

To reliably serve peak load for summer 2025, KL&P is partnering with its suppler, Southern Iowa Electric Cooperative, to provide rolling blackouts if needed.

7. Are there any significant changes that have occurred over the last year that have caused revisions to your summer preparedness strategies?

No, there have been no significant changes over the last year that caused KL&P to revise its summer preparedness strategies.

8. Are there any new hazards, threats or vulnerabilities that you are concerned may affect your utility's ability to reliably serve load on peak usage days?

No, KL&P is not concerned about any new hazards, threats or vulnerabilities that may affect its ability to reliably serve load on peak usage days.

9. Does your utility have any updates to its plans for initiating and managing a systemwide load shed to protect the bulk electric system in the event of an imbalance of electricity supply and demand? If so, what are the updates?

No, KL&P has no updates to its plans for initiating and managing a systemwide load shed to protect the bulk electric system in the event of an imbalance of electricity supply and demand.

10. Does your utility foresee any supply chain constraints affecting natural gas or coal availability? If so, what are those constraints?

No, KL&P does not foresee any supply chain constraints affecting natural gas or coal availability.

11. What can the Iowa Utilities Commission or the State of Iowa do to support the reliability and resiliency of your system?

To support the reliability and resiliency of KL&P's system, it encourage the Iowa Utilities Commission and the State of Iowa to continue performing inspections.

12. North American Electric Reliability Corporation issued its 2024 Long-Term Reliability Assessment. How do you view their concerns on energy shortfalls in the MISO region?

KL&P has no concerns about NERC's concerns about energy shortfalls in the MISO region.

13. How do these energy shortfall issues impact your decisions on long-term generation planning?

These energy shortfall issues do not impact KL&P's decisions on long-term generation planning.

INFORMATION SUBMITTED BY LAMONI MUNICIPAL UTILITIES

Winter 2024-2025 Review

1. What was your utility's experience with 2024-2025 winter operations?

Lamoni Municipal Utilities ("LMU") had no problems with its operations in winter 2024-2025.

2. Did your utility experience any difficulty procuring generation fuel or any significant increases in purchased generation fuel prices?

No, LMU did not have any difficulty procuring generation fuel or any significant increases in purchased generation fuel prices.

3. Did your utility experience any unique event(s) that distinguished this winter's operations compared to prior winters?

No, LMU did not experience any unique events in winter 2024-2025 compared to previous winters.

4. Did your utility experience higher or lower locational marginal prices ("LMP") compared to last winter? What will be the potential impact of the LMPs to ratepayers?

LMU did not have any change in LMPs in winter 2024-2025 compared to the previous winter and, as such, there will be no impact of the LMPs to ratepayers.

Summer 2025 Preparedness

5. Is your utility ready to reliably serve peak load for summer 2025? Provide details.

Yes, LMU is ready to reliably serve peak load for summer 2025. LMU can generate energy to supply its own loads in a peak and can export the same amount to the grid.

6. What steps has your utility taken in preparation to reliably serve peak load for summer 2025?

To reliably serve peak load for summer 2025, LMU will exercise its engines.

7. Are there any significant changes that have occurred over the last year that have caused revisions to your summer preparedness strategies?

No, there have been no significant changes over the last year that caused LMU to revise its summer preparedness strategies.

8. Are there any new hazards, threats or vulnerabilities that you are concerned may affect your utility's ability to reliably serve load on peak usage days?

No, LMU is not concerned about any new hazards, threats or vulnerabilities that may affect its ability to reliably serve load on peak usage days.

9. Does your utility have any updates to its plans for initiating and managing a systemwide load shed to protect the bulk electric system in the event of an imbalance of electricity supply and demand? If so, what are the updates?

No, LMU has no updates to its plans for initiating and managing a systemwide load shed to protect the bulk electric system in the event of an imbalance of electricity supply and demand.

10. Does your utility foresee any supply chain constraints affecting natural gas or coal availability? If so, what are those constraints?

No, LMU doesn't foresee any supply chain constraints affecting natural gas or coal availability.

11. What can the Iowa Utilities Commission or the State of Iowa do to support the reliability and resiliency of your system?

LMU has no recommendations.

12. North American Electric Reliability Corporation issued its 2024 Long-Term Reliability Assessment. How do you view their concerns on energy shortfalls in the MISO region?

LMU does not think there is a problem with energy shortfalls.

13. How do these energy shortfall issues impact your decisions on long-term generation planning?

These energy shortfall issues do not impact LMU's decisions on long-term generation planning.

INFORMATION SUBMITTED BY CITY OF PANORA

Winter 2024-2025 Review

1. What was your utility's experience with 2024-2025 winter operations?

The City of Panora ("Panora") had normal winter operations in 2024-2024, with only one outage during a snowstorm. The outage affected less than 30 customers and lasted approximately 40 minutes.

2. Did your utility experience any difficulty procuring generation fuel or any significant increases in purchased generation fuel prices?

Panora had sufficient fuel storage for the winter.

3. Did your utility experience any unique event(s) that distinguished this winter's operations compared to prior winters?

No, Panora did not experience any unique events in winter 2024-2025 compared to previous winters.

4. Did your utility experience higher or lower locational marginal prices ("LMP") compared to last winter? What will be the potential impact of the LMPs to ratepayers?

Panora experienced a negligible cost increase, which we projected as a 1% rate increase. This increase was as much due to an increase in material costs to maintain distribution and it was due to locational marginal prices.

Summer 2025 Preparedness

5. Is your utility ready to reliably serve peak load for summer 2025? Provide details.

Yes, Panora constructed a new substation in 2020 with more than enough capacity to handle summer loads. Panora's standby generation is also sufficient to handle any required loads.

6. What steps has your utility taken in preparation to reliably serve peak load for summer 2025?

Panora added additional lightning protection to rural areas. We are also currently installing an additional underground bypass feed to shed load from our highest load circuit to a lighter circuit.

7. Are there any significant changes that have occurred over the last year that have caused revisions to your summer preparedness strategies?

No, there have been no significant changes over the last year that caused Panora to revise its summer preparedness strategies.

8. Are there any new hazards, threats or vulnerabilities that you are concerned may affect your utility's ability to reliably serve load on peak usage days?

No, Panora is not concerned about any new hazards, threats or vulnerabilities that may affect its ability to reliably serve load on peak usage days. Panora's standby generators are in good condition and ready to offset high load if requested or if power outages occur in its area.

9. Does your utility have any updates to its plans for initiating and managing a systemwide load shed to protect the bulk electric system in the event of an imbalance of electricity supply and demand? If so, what are the updates?

As noted in the answer to Question 6 above, Panora is installing additional bypass circuits to help with load management. Panora also has 4.5 megawatts of generation, with a projected high load of approximately 3.2 megawatts.

10. Does your utility foresee any supply chain constraints affecting natural gas or coal availability? If so, what are those constraints?

Panora has experienced supply chain constraints in the past from its supply grid and carried its own load on generation in addition to supplying surplus power to the grid. We are prepared for this contingency again this summer.

11. What can the Iowa Utilities Commission or the State of Iowa do to support the reliability and resiliency of your system?

Panora has no recommendations.

12. North American Electric Reliability Corporation issued its 2024 Long-Term Reliability Assessment. How do you view their concerns on energy shortfalls in the MISO region?

The major concern that Panora has with NERC's 2024 Long-Term Reliability Assessment is that prolonged generation may cause significant rate increases for its customers.

13. How do these energy shortfall issues impact your decisions on long-term generation planning?

Panora's major concern with energy shortfall issues is that grid power will become so unreliable that continuous generation may be required for longer periods of time. This will affect personnel, higher costs for EPA testing, and maintenance costs not covered by Panora's current CIPCO contract. Additional resources to address these concerns are provided to the best of Panora's ability.

INFORMATION SUBMITTED BY NEW LONDON MUNICIPAL UTILITIES

Winter 2024-2025 Review

1. What was your utility's experience with 2024-2025 winter operations?

New London Municipal Utilities' ("NLMU") experience with winter 2024-2025 was normal with no significant problems.

2. Did your utility experience any difficulty procuring generation fuel or any significant increases in purchased generation fuel prices?

NLMU did not experience any difficulty procuring generation fuel or have any significant increases in purchased generation fuel prices.

3. Did your utility experience any unique event(s) that distinguished this winter's operations compared to prior winters?

NLMU did not experience any unique events in winter 2024-2025 compared to previous winters.

4. Did your utility experience higher or lower locational marginal prices ("LMP") compared to last winter? What will be the potential impact of the LMPs to ratepayers?

NLMU did not have any change in LMPs in winter 2024-2025 compared to the previous winter and, as such, does not foresee any impact of the LMPs to ratepayers.

Summer 2025 Preparedness

5. Is your utility ready to reliably serve peak load for summer 2025? Provide details.

NLMU is very reliable and ready to serve our customers during peak load. NLMU has procured its fuel supply for the summer, and maintenance on the generator and the breaker is up to date.

6. What steps has your utility taken in preparation to reliably serve peak load for summer 2025?

See the answer to Question 5.

7. Are there any significant changes that have occurred over the last year that have caused revisions to your summer preparedness strategies?

No, there have been no significant changes over the last year that caused NLMU to revise its summer preparedness strategies.

8. Are there any new hazards, threats or vulnerabilities that you are concerned may affect your utility's ability to reliably serve load on peak usage days?

No, NLMU is not concerned about any new hazards, threats or vulnerabilities that may affect its ability to reliably serve load on peak usage days.

9. Does your utility have any updates to its plans for initiating and managing a systemwide load shed to protect the bulk electric system in the event of an imbalance of electricity supply and demand? If so, what are the updates?

NLMU does not have any updates to its plans for initiating and managing a systemwide load shed to protect the bulk electric system in the event of an imbalance of electricity supply and demand.

10. Does your utility foresee any supply chain constraints affecting natural gas or coal availability? If so, what are those constraints?

NLMU does not foresee any supply chain constraints affecting natural gas or coal availability.

11. What can the Iowa Utilities Commission or the State of Iowa do to support the reliability and resiliency of your system?

NLMU has no recommendations.

12. North American Electric Reliability Corporation issued its 2024 Long-Term Reliability Assessment. How do you view their concerns on energy shortfalls in the MISO region?

NLMU has no opinion regarding NERC's 2024 Long-Term Reliability Assessment.

13. How do these energy shortfall issues impact your decisions on long-term generation planning?

At this time, the energy shortfall issues do not impact NLMU's decisions on long-term generation planning.

INFORMATION SUBMITTED BY CITY OF AURELIA

Winter 2024-2025 Review

1. What was your utility's experience with 2024-2025 winter operations?

The City of Aurelia's ("Aurelia") 2024-2025 winter operations were average.

2. Did your utility experience any difficulty procuring generation fuel or any significant increases in purchased generation fuel prices?

Aurelia did not experience any difficulty procuring generation fuel or any significant increases in purchased generation fuel prices.

3. Did your utility experience any unique event(s) that distinguished this winter's operations compared to prior winters?

No, Aurelia did not experience any unique events in winter 2024-2025 compared to previous winters.

4. Did your utility experience higher or lower locational marginal prices ("LMP") compared to last winter? What will be the potential impact of the LMPs to ratepayers?

Aurelia experienced locational marginal prices that were a little higher in winter 2024-2025 compared to last winter and will raise customers rates later this year.

Summer 2025 Preparedness

5. Is your utility ready to reliably serve peak load for summer 2025? Provide details.

Yes, Aurelia's transformers, substation, and conductors are sized well to reliably serve peak load for summer 2025.

6. What steps has your utility taken in preparation to reliably serve peak load for summer 2025?

Aurelia has the "Switch Makes Cents" program that allows it to shed load at peak times.

7. Are there any significant changes that have occurred over the last year that have caused revisions to your summer preparedness strategies?

No, there have been no significant changes over the last year that caused Aurelia to revise its summer preparedness strategies.

8. Are there any new hazards, threats or vulnerabilities that you are concerned may affect your utility's ability to reliably serve load on peak usage days?

No, Aurelia is not concerned about any new hazards, threats or vulnerabilities that may affect its ability to reliably serve load on peak usage days.

9. Does your utility have any updates to its plans for initiating and managing a systemwide load shed to protect the bulk electric system in the event of an imbalance of electricity supply and demand? If so, what are the updates?

Aurelia does not have any updates to its plans for initiating and managing a systemwide load shed to protect the bulk electric system in the event of an imbalance of electricity supply and demand.

10. Does your utility foresee any supply chain constraints affecting natural gas or coal availability? If so, what are those constraints?

Aurelia does not foresee any supply chain constraints affecting natural gas or coal availability.

11. What can the Iowa Utilities Commission or the State of Iowa do to support the reliability and resiliency of your system?

Aurelia has no recommendations.

12. North American Electric Reliability Corporation issued its 2024 Long-Term Reliability Assessment. How do you view their concerns on energy shortfalls in the MISO region?

Aurelia thinks the MISO region needs to strategically plan for bitcoin mines and data centers coming online in the region because they will have the biggest impact.

13. How do these energy shortfall issues impact your decisions on long-term generation planning?

Energy shortfalls in the MISO region don't impact Aurelia's decisions on long-term generation planning because it doesn't generate.

INFORMATION SUBMITTED BY CITY OF FAIRBANK

Winter 2024-2025 Review

1. What was your utility's experience with 2024-2025 winter operations?

The City of Fairbank ("Fairbank") had no problems with its operations during winter 2024-2025.

2. Did your utility experience any difficulty procuring generation fuel or any significant increases in purchased generation fuel prices?

Fairbank did not experience any difficulty procuring generation fuel or any significant increases in purchased generation fuel prices.

3. Did your utility experience any unique event(s) that distinguished this winter's operations compared to prior winters?

Fairbank did not experience any unique events in winter 2024-2025 compared to previous winters.

4. Did your utility experience higher or lower locational marginal prices ("LMP") compared to last winter? What will be the potential impact of the LMPs to ratepayers?

Fairbank did not have any change in LMPs in winter 2024-2025 compared to the previous winter and, as such, there will be no impact of the LMPs to ratepayers.

Summer 2025 Preparedness

5. Is your utility ready to reliably serve peak load for summer 2025? Provide details.

Yes, Fairbank is ready to reliably serve peak load for summer 2025.

6. What steps has your utility taken in preparation to reliably serve peak load for summer 2025?

Fairbank performs normal maintenance on its equipment to reliably serve peak load for summer 2025.

7. Are there any significant changes that have occurred over the last year that have caused revisions to your summer preparedness strategies?

No, there have been no significant changes over the last year that caused Fairbank to revise its summer preparedness strategies.

8. Are there any new hazards, threats or vulnerabilities that you are concerned may affect your utility's ability to reliably serve load on peak usage days?

No, Fairbank is not concerned about any new hazards, threats or vulnerabilities that may affect its ability to reliably serve load on peak usage days.

9. Does your utility have any updates to its plans for initiating and managing a systemwide load shed to protect the bulk electric system in the event of an imbalance of electricity supply and demand? If so, what are the updates?

Fairbank does not have any updates to its plans for initiating and managing a systemwide load shed to protect the bulk electric system in the event of an imbalance of electricity supply and demand.

10. Does your utility foresee any supply chain constraints affecting natural gas or coal availability? If so, what are those constraints?

Fairbank does not foresee any supply chain constraints affecting natural gas or coal availability.

11. What can the Iowa Utilities Commission or the State of Iowa do to support the reliability and resiliency of your system?

Fairbank has no recommendations.

12. North American Electric Reliability Corporation issued its 2024 Long-Term Reliability Assessment. How do you view their concerns on energy shortfalls in the MISO region?

Fairbank has no opinion on NERC's 2024 Long-Term Reliability Assessment.

13. How do these energy shortfall issues impact your decisions on long-term generation planning?

Energy shortfalls in the MISO region don't impact Fairbank's decisions on long-term generation planning because it doesn't generate.

INFORMATION SUBMITTED BY READLYN MUNICIPAL UTILITIES

Winter 2024-2025 Review

1. What was your utility's experience with 2024-2025 winter operations?

Readlyn Municipal Utilities ("RMU") didn't experience anything out of the ordinary during winter 2024-2025.

2. Did your utility experience any difficulty procuring generation fuel or any significant increases in purchased generation fuel prices?

Not applicable. RMU buys wholesale and distributes; it has no generation.

3. Did your utility experience any unique event(s) that distinguished this winter's operations compared to prior winters?

No, RMU did not experience any unique events in winter 2024-2025 compared to previous winters.

4. Did your utility experience higher or lower locational marginal prices ("LMP") compared to last winter? What will be the potential impact of the LMPs to ratepayers?

RMU did not have any change in LMPs in winter 2024-2025 compared to the previous winter and, as such, there will be no impact of the LMPs to ratepayers.

Summer 2025 Preparedness

5. Is your utility ready to reliably serve peak load for summer 2025? Provide details.

Yes, RMU is ready to reliably serve peak load for summer 2025.

6. What steps has your utility taken in preparation to reliably serve peak load for summer 2025?

RMU has taken the normal steps to reliably serve peak load for summer 2025.

7. Are there any significant changes that have occurred over the last year that have caused revisions to your summer preparedness strategies?

No, there have been no significant changes over the last year that caused RMU to revise its summer preparedness strategies.

8. Are there any new hazards, threats or vulnerabilities that you are concerned may affect your utility's ability to reliably serve load on peak usage days?

No, RMU is not concerned about any new hazards, threats or vulnerabilities that may affect its ability to reliably serve load on peak usage days.

9. Does your utility have any updates to its plans for initiating and managing a systemwide load shed to protect the bulk electric system in the event of an imbalance of electricity supply and demand? If so, what are the updates?

RMU does not have any updates to its plans for initiating and managing a systemwide load shed to protect the bulk electric system in the event of an imbalance of electricity supply and demand.

10. Does your utility foresee any supply chain constraints affecting natural gas or coal availability? If so, what are those constraints?

RMU does not foresee any supply chain constraints affecting natural gas or coal availability.

11. What can the Iowa Utilities Commission or the State of Iowa do to support the reliability and resiliency of your system?

RMU has no recommendations.

12. North American Electric Reliability Corporation issued its 2024 Long-Term Reliability Assessment. How do you view their concerns on energy shortfalls in the MISO region?

RMU has no opinion on NERC's 2024 Long-Term Reliability Assessment.

13. How do these energy shortfall issues impact your decisions on long-term generation planning?

Energy shortfalls in the MISO region don't impact RMU's decisions on long-term generation planning because it doesn't generate.

INFORMATION SUBMITTED BY CEDAR FALLS UTILITIES

Winter 2024-2025 Review

1. What was your utility's experience with 2024-2025 winter operations?

Cedar Falls Utilities ("CFU") experienced normal operations in winter 2024-2025; there were no significant events or concerns.

2. Did your utility experience any difficulty procuring generation fuel or any significant increases in purchased generation fuel prices?

Natural gas prices have been volatile since Winter Storm Uri in 2021. Winter 2024-2025 was less volatile compared to previous winters, with only a 250% price spike one weekend in January 2025, which was good news for CFU's generation costs and its customers.

3. Did your utility experience any unique event(s) that distinguished this winter's operations compared to prior winters?

CFU experienced a couple of cold weather periods with high prices in winter 2024-2025 compared to previous winters, but there were no delivery issues. Northern Natural Gas called an unusually high number of System Limitations in winter 2024-2025, even when the weather was not that abnormal.

4. Did your utility experience higher or lower locational marginal prices ("LMP") compared to last winter? What will be the potential impact of the LMPs to ratepayers?

CFU's experience with the LMPs was as expected, considering natural gas prices, and there was nothing out of the ordinary. Gas prices and wind production typically determine LMPs.

Summer 2025 Preparedness

5. Is your utility ready to reliably serve peak load for summer 2025? Provide details.

Yes, as a MISO participant, all of CFU's generation assets are maintained and prepared to respond as needed to reliably serve peak load for summer 2025 and any other events.

6. What steps has your utility taken in preparation to reliably serve peak load for summer 2025?

CFU has completed all maintenance on its generation assets and it is ready to provide electricity to its customers this summer.

7. Are there any significant changes that have occurred over the last year that have caused revisions to your summer preparedness strategies?

No, there have been no significant changes over the last year that caused CFU to revise its summer preparedness strategies.

8. Are there any new hazards, threats or vulnerabilities that you are concerned may affect your utility's ability to reliably serve load on peak usage days?

No, CFU is not concerned about any new hazards, threats or vulnerabilities that may affect its ability to reliably serve load on peak usage days.

9. Does your utility have any updates to its plans for initiating and managing a systemwide load shed to protect the bulk electric system in the event of an imbalance of electricity supply and demand? If so, what are the updates?

CFU increased the interruptible load on its system and is able to curtail a substantial amount of demand quickly as needed.

10. Does your utility foresee any supply chain constraints affecting natural gas or coal availability? If so, what are those constraints?

CFU has no concerns regarding the availability of natural gas or coal this summer.

11. What can the Iowa Utilities Commission or the State of Iowa do to support the reliability and resiliency of your system?

CFU recommends that the Iowa Utilities Commission and the State of Iowa continue to support the addition of dispatchable generation and transmission lines to serve load growth and replace retiring assets.

12. North American Electric Reliability Corporation issued its 2024 Long-Term Reliability Assessment. How do you view their concerns on energy shortfalls in the MISO region?

Electrical generation and transmission planning is important as CFU continues to see more variable generation resources being added (e.g., wind and solar). CFU will need dispatchable generation resources that can quickly come online when the various resources are not available. The retirement of coal generation is causing a shortfall that needs to be replaced. FERC and MISO must minimize the time requirements and remove barriers to building more generation and transmission that are required to replace the assets that we are losing.

13. How do these energy shortfall issues impact your decisions on long-term generation planning?

CFU plans to add more local, fast-acting, dispatchable generation assets in the near future to provide electrical generation as needed to support the grid and its customers into the future.

INFORMATION SUBMITTED BY MUSCATINE POWER AND WATER

Winter 2024-2025 Review

1. What was your utility's experience with 2024-2025 winter operations?

Muscatine Power and Water ("MPW") experienced no impact to its operations due to cold weather during winter 2024-2025. MPW's coal-fired units were able to respond when called upon to meet the demands of the grid.

2. Did your utility experience any difficulty procuring generation fuel or any significant increases in purchased generation fuel prices?

MPW did not experience any issues with coal procurement. MPW entered the winter season with ample reserves and all planned deliveries arrived as scheduled.

3. Did your utility experience any unique event(s) that distinguished this winter's operations compared to prior winters?

No, MPW did not experience any unique events in winter 2024-2025 compared to previous winters.

4. Did your utility experience higher or lower locational marginal prices ("LMP") compared to last winter? What will be the potential impact of the LMPs to ratepayers?

MPW experienced slightly higher than average LMPs compared to past winters, but this will not impact its rate payers. MPW has enough local generation to cover Muscatine's load and is able to sell excess when prices are favorable.

Summer 2025 Preparedness

5. Is your utility ready to reliably serve peak load for summer 2025? Provide details.

Yes, MPW is prepared to serve its peak load for summer 2025. MPW completed maintenance outages in spring 2025 on its units to help ensure their reliable operation. MPW has enough coal on site to carry it through the season, with scheduled deliveries through the summer to maintain the pile. MPW typically sees a summer peak load in the 140-145 MW range. Its generating capacity has a capability of over 250 MW, which means it currently has excess capacity to serve its peak this summer and further support the grid. Also, MPW has multiple transmission ties to neighboring systems to further support its system and others. MPW is in an excellent position to serve its peak load from the perspective of its local assets and ties to its neighbors. Finally, MPW continues to install animal protection and manage vegetation throughout the year.

6. What steps has your utility taken in preparation to reliably serve peak load for summer 2025?

MPW completed maintenance outages this spring on its units to help ensure their reliable operation. MPW has enough coal on site to carry us through the season, with scheduled deliveries through the summer to maintain the pile. Furthermore, MPW continues to install animal protection and manage vegetation throughout the year. Each spring, MPW sends letters to large customers to remind them of the potential for load shed and their responsibilities to support that effort. Large customers return to MPW letters signed by company officials as evidence of their willing participation. At the same time, MPW asks these customers to update their emergency contact numbers and list of personnel to ensure ease of communication with them.

7. Are there any significant changes that have occurred over the last year that have caused revisions to your summer preparedness strategies?

No, there have been no significant changes over the last year that caused MPW to revise its summer preparedness strategies.

8. Are there any new hazards, threats or vulnerabilities that you are concerned may affect your utility's ability to reliably serve load on peak usage days?

Locally, a lack of stability in the capacity market makes it challenging to keep uneconomical units available for peaking as the capacity payments regularly aren't enough to meet fixed costs.

Statewide, there are an increasing number of intermittent resources that are unable to dispatch as required to meet demand. Forecast errors of these resources can further complicate the ability to ensure that there are enough resources available to weather any storms.

9. Does your utility have any updates to its plans for initiating and managing a systemwide load shed to protect the bulk electric system in the event of an imbalance of electricity supply and demand? If so, what are the updates?

In recent years, MPW scaled up its incident command response to ensure readiness by taking steps like updating the MPW load-shed priority list and pre-planning distribution of customer information messages about what to expect and how to best handle the outages. Senior MPW staff members also participate in load shed drills and meet during MISO declared emergencies to ensure MPW is doing everything it can to have a proper response and support the interconnection. MPW also has set plans with large industrial customers to drop their loads in a controlled manner, resulting in a safer and controlled load shed.

10. Does your utility foresee any supply chain constraints affecting natural gas or coal availability? If so, what are those constraints?

MPW currently has enough coal on the ground to get it through summer, even without any additional scheduled deliveries.

11. What can the Iowa Utilities Commission or the State of Iowa do to support the reliability and resiliency of your system?

The Iowa Utilities Commission ("IUC") should continue to support existing baseload generation by not taking actions that would retire units unwisely. In addition, the IUC should continue its support for GCU applications, such as MPW's combined heat and power unit, so that new capacity additions are not slowed up any more than necessary. Finally, the IUC should continue its efforts to help improve the MISO queue process.

12. North American Electric Reliability Corporation issued its 2024 Long-Term Reliability Assessment. How do you view their concerns on energy shortfalls in the MISO region?

MPW shares NERC's concern as the generation portfolio continues to move towards more intermittent resources and see the retirement of dispatchable, stable resources. Coupling this with continued load growth is a reason for concern.

13. How do these energy shortfall issues impact your decisions on long-term generation planning?

MPW has already postponed the retirement of two coal-fired units to keep them as capacity/peaking resources. In addition, we have begun two new projects to help replace their capacity when the need for retirement becomes unavoidable.