

**STATE OF IOWA  
DEPARTMENT OF COMMERCE  
UTILITIES DIVISION  
BEFORE THE IOWA UTILITIES COMMISSION**

**IN RE:**

**INTERSTATE POWER AND LIGHT  
COMPANY**

**DOCKET NO. TF-2025-0047**

**PETITION TO INTERVENE BY THE LARGE ENERGY GROUP**

Pursuant to 199 Iowa Administrative Code § 7.13, the Large Energy Group (“LEG”) petitions the Iowa Utilities Commission (“Commission”) to intervene in this matter. In support of its Petition, LEG states:

1. On June 16, 2025, Interstate Power and Light Company (“IPL”) filed its Request for Review of Individual Customer (ICR) Service Agreements and Specific Ratemaking Treatment and Application for Confidential Treatment (“Request”).
2. On July 9, 2025, the Office of Consumer Advocate filed an Objection and Request to Establish Procedural Schedule.
3. On July 10, 2025, the Commission entered a Notice of Docketing and Suspending Tariff
4. On July 15, 2025, the Commission entered an Order Establishing Procedural Schedule and Deferring Consideration for Confidentiality Request, setting an intervention deadline of July 24, 2025.
5. LEG is a group of major electric service customers of IPL. Participants of LEG include the following Iowa based energy users: AG Processing (Mason City); Agri-Industrial

Plastics (Fairfield); Amsted Griffin Wheel (Keokuk); International Flavors and Fragrances (DuPont) (Cedar Rapids); FMI Climax Molybdenum (Fort Madison); Guardian Glass (DeWitt); Ingredion (Cedar Rapids); International Paper- Cedar River Mill (Cedar Rapids); International Paper – Shaver Rd. (Cedar Rapids); Keokuk Water Works (Keokuk); Mercy Medical Center (Cedar Rapids); PMX Industries (Cedar Rapids); Pepsi Quaker Oats (Cedar Rapids); Rockwell Collins (Cedar Rapids); Roquette America (Keokuk); Treehouse Foods (Cedar Rapids); Unity Point St. Luke's Hospital (Cedar Rapids); and Verbio (Nevada).

6. As electric service customers of IPL, the members of LEG have a clear interest in the subject matter of this proceeding and expect to be affected by its outcome.

7. As major electric service customers of IPL, the members of LEG have interests that are unique to them and require representation in addition to the interests represented by the current parties.

8. LEG has no means to adequately protect its interest other than by intervention.

9. LEG will be represented by Kelly A. Cwiertny, resident attorney licensed to practice in Iowa.

10. LEG reserves the right to propound data requests and participate in other discovery, and to participate in workshops or hearings.

11. LEG's participation in this proceeding can reasonably be expected to assist in the development of a sound record through the presentation of relevant evidence and argument.

WHEREFORE, LEG respectfully requests that the Board promptly issue an order permitting LEG to intervene in this docket proceeding and to participate as its interests appear.

Respectfully submitted this 16<sup>th</sup> day of July, 2025.

By: /s/ Kelly Cwiertny

Kelly Cwiertny

SHUTTLEWORTH & INGERSOLL PLC  
115 3<sup>rd</sup> St. SE Suite 500  
Cedar Rapids, Iowa 52401  
(319) 365-9461  
[kac@shuttleworthlaw.com](mailto:kac@shuttleworthlaw.com)

ATTORNEY FOR THE  
LARGE ENERGY GROUP