

STATE OF IOWA
BEFORE THE IOWA UTILITIES COMMISSION

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

COMES NOW, Interstate Power and Light Company (IPL) and provides its response to the Iowa Utilities Commission (Commission) Order Requesting Information Regarding Summer 2025 Preparedness Plans issued on April 25, 2025 (Order). The Commission has directed all rate-regulated electric utilities to file responses to questions found in Attachment A of the Order. Below are IPL's responses to the Commission's questions.

Winter 2024-2025 Review

Question No. 1

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

IPL Response

Regarding fuel procurement for electric generation operations, IPL did not experience anything out of the ordinary in procuring fuel nor did it experience challenges with fuel prices. IPL Generation did not experience anything out of the ordinary during the 2024-2025 winter season.

For IPL's electric distribution system, it experienced two significant events in the winter of 2024-2025. These events involved outages at the transmission and distribution level. On December 14, 2024, an ice storm in southeast Iowa resulted in approximately

30,000 customers experiencing an outage. All customers were restored within 30 hours. On March 5, 2025, blizzard conditions in western Iowa affected approximately 15,000 customers and involved difficult road conditions. Most of the impacted customers were restored within 24 hours.

Question No. 2

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

IPL Response

IPL did not experience difficulty procuring fuel nor did it experience a significant increase in fuel prices.

Question No. 3

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

IPL Response

IPL did not experience any unique events from a fuels supply, reliability, generation operations perspective, or its electric distribution system that distinguished this previous winter's operations from prior winters. MISO declared three cold weather alerts and these were managed well by MISO and its members, thus avoiding any maximum generation warnings or events during the winter of 2024-2025.

Question No. 4

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

IPL Response

The LMP-based cost to purchase power from the MISO market to serve IPL's load was about 15 percent higher in winter 2024-2025 than in the previous winter. IPL

customers did not experience the same impact in the Energy Adjustment Clause because of other factors included in the EAC.

Question No. 5

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

IPL Response

IPL is prepared to serve peak load for Summer 2025. IPL's Pleasant Creek, Creston, and Wever solar projects are in service to supply customer needs.

We continue to follow our preventative maintenance schedules and Planned Outage schedules to ensure that our units are prepared to run throughout the year through the range of temperatures experienced in our geographical area.

IPL works to keep all of its generation available during the summer months, all IPL generation facilities have plans and checklists to ensure reliable operations during periods of hot weather. These plans are reviewed and implemented prior to each summer season. The Company plans for the possibility of an extreme weather event in all summers. IPL monitors weather forecasts and information provided by MISO for extreme weather events, providing necessary information to its generating facilities. IPL has secured fuel supplies needed for its generation.

IPL's distribution system is prepared to reliably serve peak load for summer 2025.

Question No. 6

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

IPL Response

IPL has placed its Pleasant Creek, Creston, and Wever solar projects in service to supply customer needs. In addition, IPL is executing on the future needs identified in its Resource Evaluation Study (RES) to meet resource needs beyond 2025.

IPL works to keep all of its generation available during the summer months, all IPL generation facilities have plans and checklists to ensure reliable operations during periods of hot weather. These plans are reviewed and implemented prior to each summer season. The Company plans for the possibility of an extreme weather event in all summers. IPL monitors weather forecasts and information provided by MISO of extreme weather events, providing necessary information to its generating facilities. IPL has secured fuel supplies needed for its generation.

We continue to follow our preventative maintenance schedules and Planned Outage schedules to ensure that our units are prepared to run throughout the year through the range of temperatures experienced in our geographical area.

Question No. 7

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

IPL Response

There are no significant changes that have occurred over the last year that have caused revisions to IPL's summer preparedness strategies. We continue to follow our preventative maintenance schedules and Planned Outage schedules to ensure that our units are prepared to run throughout the year through the range of temperatures experienced in our geographical area.

The April 2025 Midcontinent Independent System Operator (MISO) Planning Resource Auction results with Summer Capacity prices set at approximately twice the cost of new entry (CONE) highlights the value of IPL's recent addition of 400 MW of solar generation to prepare to meet the summer peak.

Question No. 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?

IPL Response

IPL has sufficient capacity to serve IPL's forecasted peak load. MISO, as the Balancing Authority, is responsible for the load/generation balance in the MISO footprint. IPL has not identified any new hazards, threats or vulnerabilities in its generation fleet or on its distribution system that would affect its ability to reliably serve load on peak usage days.

Question No. 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?

IPL Response

IPL has updated the priority of which circuits would be shed first in a shedding event. Changes in circuit loading, the addition of new substations, and the addition of SCADA in substations impacted the prioritization of circuits. IPL's process for initiating a systemwide load shed has not changed for generation or for its distribution system circuits.

IPL has not made changes to its Demand Response portfolio as approved in EEP-2022-0150 and expects to utilize the programs as needed for summer 2025 to help alleviate the need for systemwide load shed events. IPL is exploring additional opportunities to expand the portfolio concurrently with projected load growth.

Question No. 10

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

IPL Response

IPL does not foresee any supply chain constraints affecting natural gas or coal availability for the upcoming summer period.

Question No. 11

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

IPL Response

The Commission and State of Iowa can continue to support and approve investments in the electric generation and distribution systems and take into consideration the long-term nature of investments needed to build and ensure electric system resilience. Commission support of MISO's Expedited Resource Adequacy Study (ERAS) at the Federal Energy Regulatory Commission would allow IPL and other utilities in MISO to site and connect needed generation resources at existing locations. To support the reliability and resiliency of the electric system in Iowa, the Commission can continue to remain engaged at MISO and/or FERC.

Question No. 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?

IPL Response

NERC's energy shortfall concerns appear consistent with MISO's concerns shared in its Reliability Imperative.¹ IPL does not disagree with those concerns; however, the NERC document does not acknowledge MISO's changes to its resource adequacy construct consistent with NERC's recommendations.

¹ https://www.misoenergy.org/meet-miso/MISO_Strategy/reliability-imperative/

Question No. 13

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

IPL Response

IPL adapted its resource planning processes to address energy shortfall concerns in its recent Resource Evaluation Study (RES) filed in Docket No. RPU-2021-0003 on February 13, 2025. For example, IPL's RES modeled MISO's Direct-Loss of Load construct, which sets obligations and capacity accreditation under conditions that simulate potential future seasonal reserve margin challenges. Additionally, IPL evaluated potential unserved energy risk for portfolios across a range of potential weather years.

WHEREFORE, IPL respectfully requests that the Board accept IPL's response to the Board's questions in its April 25 Order.

Dated this 27th day of May 2025.

Respectfully submitted,

INTERSTATE POWER AND LIGHT COMPANY

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