

STATE OF IOWA  
DEPARTMENT OF COMMERCE  
UTILITIES BOARD

---

IN RE:

INVESTIGATION INTO IOWA UTILITIES'  
2022-2023 WINTER PREPAREDNESS  
PLANS

DOCKET NO. INU-2022-0002

---

**ORDER REQUESTING INFORMATION ON WINTER PREPAREDNESS PLANS  
FOR 2022-2023**

On October 20, 2022, the Federal Energy Regulatory Commission's (FERC) Office of Energy Policy and Innovation and Office of Electric Reliability (FERC Staff) issued a joint report to FERC regarding a 2022-2023 winter assessment. The report used preliminary data from the North American Electric Reliability Corporation's (NERC) 2022-2023 Winter Reliability Assessment and the NERC Long Term Reliability Assessment. In November 2022, NERC issued its final 2022-2023 Winter Reliability Assessment. In the final assessment, NERC identified that a large portion of the North American Bulk Power System is at risk of insufficient electricity supplies during peak winter conditions.

NERC's analysis shows in particular that in the Midcontinent Independent System Operator, Inc. (MISO), balancing authority area, reserve margins have fallen by more than 5 percent since the 2021-2022 winter. The FERC Staff report also indicates that some generation and transmission projects are impacted by component unavailability, shipping delays, and labor shortages. Taken together, the assessment

DOCKET NO. INU-2022-0002

PAGE 2

from both FERC and NERC indicates that for the region served by MISO, which includes most of Iowa, is projected to have a capacity shortfall that potentially could require Iowa electric utilities to implement temporary load sheds or reductions in electricity to customers in peak winter conditions.

The Southwest Power Pool (SPP) is a regional transmission organization that could be impacted by the same weather conditions. For example, in February 2021, a major winter storm impacted a significant portion of the United States, including MISO and SPP regions. As one of the regional transmission organizations that is tasked with the responsibilities of ensuring reliable supplies of power to Iowans, SPP directed its member utilities during the February 2021 storm to shed electric load in a controlled process, which directly affected customers in Iowa.

The Utilities Board (Board) has general jurisdiction over rate-regulated electric utilities and some limited jurisdiction over electric cooperatives and municipal electric utilities in Iowa pursuant to Iowa Code chapters 476 and 478. The Board considers it important to understand how Iowa electric utilities plan to address the potential shortfall in capacity and possible need to shed load during peak usage days this winter. The Board opened Docket No. INU-2022-0001 to address projected shortfalls for this past summer, and this order is requesting utilities provide similar information in this docket regarding plans for the coming winter.

Iowa Code § 476.17 authorizes the Board to adopt rules requiring public utilities to establish peak-load management procedures. The Board adopted rules requiring rate-regulated utilities to have plans for notifying customers of approaching peak demand. Pursuant to 199 Iowa Administrative Code 20.11, each investor-owned utility

DOCKET NO. INU-2022-0002

PAGE 3

shall have a plan to notify its customers of an approaching peak demand on the day when peak demand is likely to occur. The plans are to include an explanation of what conditions will require a peak alert, general notice to the public of the peak alert, and the messages that will be sent to the public. The rule requires that the plan shall be made available to the Board upon request. The assessment reports forecast a possible need to shed load this winter during peak usage, and this raises the Board's concern about the utilities' plans to ensure the provision of safe and adequate electric service if this occurs.

To meet its obligations under Iowa Code chapters 476 and 478, the Board is requesting that all electric utilities provide the Board with information in regard to the utilities' plans to address the possible temporary load shedding requirement and how each utility intends to notify customers of an upcoming peak demand day this winter. The Board has opened Docket No. INU-2022-0002 to address the issues and to receive the plans to be filed by the utilities. The Board has set out questions for the utilities to answer regarding this issue in Attachment A to this order.

The Board also intends to hold a technical conference so the electric utilities can share their plans and answer any further questions that the Board might have.

**IT IS THEREFORE ORDERED:**

1. Docket No. INU-2022-0002 is opened to address electric utilities' plans for addressing load shedding on peak winter days.

2. The Iowa load-serving entities are to answer the questions listed in Attachment A, which is incorporated by reference into this order, by filing responses in Docket No. INU-2022-0002 no later than December 14, 2022.

DOCKET NO. INU-2022-0002

PAGE 4

3. A technical conference shall begin at 1 p.m. December 19, 2022, in the Utilities Board's Hearing Room, located at 1375 E. Court Ave., Des Moines, Iowa.

4. Persons wishing to attend the technical conference scheduled in Ordering Clause 3 shall file a pleading on or before December 14, 2022, indicating whether participation will be in person or virtual.

5. Persons with disabilities who will require assistive services or devices to observe or participate in this technical conference shall contact the Utilities Board at (515) 725-7300 at least five business days in advance to request arrangements.

**UTILITIES BOARD**

---

Richard Lozier Date: 2022.11.30  
12:53:12 -06'00'

---

ATTEST:

Louis Vander Streek Louis Vander Streek  
2022.12.01 10:01:02  
-06'00'

---

Joshua J Byrnes Date: 2022.11.30  
16:07:54 -06'00'

---

Dated at Des Moines, Iowa, this 1st day of December, 2022.

1. Is your utility ready to reliably serve peak load for winter 2022-2023?
2. Does your utility have a comprehensive plan 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?
  - a. What are the plans?
  - b. How often are the plans for firm load shed reviewed and updated, and what is the review process?
  - c. Are these plans coordinated with other utilities in Iowa and/or RTOs?
3. Does your utility participate in Midcontinent Independent System Operator, Inc., and Southwest Power Pool, Inc., emergency drills, including the firm load shed drills? What lessons have been learned from this participation?
4. Are Iowa utilities prepared for a prolonged period of severe cold similar to February 2021 winter storm Uri? What changes have been made in the planning and preparation from the lessons learned in winter 2021?
5. If your utility serves as a Local Balancing Authority, how do you communicate firm load shed plans to load serving entities within your balancing areas?
6. How has your utility prepared and updated its communication plan to provide timely information to customers, regulators, and other stakeholders?
7. What are your expectations on winter 2022-2023 energy prices compared to prior years?
8. Do you have short-term and/or long-term policy suggestions that the Utilities Board could implement to ensure Iowa customers experience minimal impact from possible capacity shortages in the future? If so, what are the policy suggestions?
9. To what extent do you plan to rely on emergency and/or economic demand response programs to avoid blackouts?
10. Do you have any coal or coal transportation (rail) issues that are hindering the winter preparedness for the thermal generation fleet of the utilities? What steps have been taken to address the issue?
11. Have you faced any component availability, shipping delays, or labor shortage issues in spring/summer 2022 and did your company forego any outage or planned maintenance ?
12. What are the weather assumptions for 2022-2023 winter operations and resource availability? What are the weather characteristics of the reasonable worst-case scenario?
13. Iowa utilities that have registered generator assets are requested to provide outage and maintenance schedules for the next six months.
14. Iowa utilities with behind the meter generation are requested to provide the type, fuel, and capacity of those generation assets.