STATE OF IOWA DEPARTMENT OF COMMERCE IOWA UTILITIES BOARD

IN RE:

CHAPTER 11 RULES INCORPORATING ADOPTION OF IOWA CODE § 478.16

DOCKET NO. RMU-2021-1114

REPLY COMMENTS ON DRAFT NOTICE OF INTENDED ACTION

Pursuant to the Iowa Utilities Board's ("Board") June 24, 2021 Order Requesting

Stakeholder Comment on Draft Notice of Intended Action (Order), the Association of Municipal

Utilities ("IAMU") submit the following comments in reply to the July 21, 2021 comments of

Missouri River Energy Services ("MRES"), and the July 26, 2021 comments of Interstate Power

and Light Company ("IPL"), the Resale Power Group of Iowa and the Large Energy Group

(collectively "Transmission Customers"), the Office of Consumer Advocate ("OCA"), and ITC

Midwest LLC and MidAmerican Energy Company (collectively "Private Transmission

Owners"):

- 1. IAMU is in general agreement with many of the technical comments filed by the Private Transmission Owners, IPL, and OCA in this Docket and looks forward to reviewing reply comments.
 - 2. At present, IAMU elects to stand on its previously filed written comments.
- 3. IAMU looks forward to reviewing and addressing the rules that the Board will propose in a formal notice of proposed rulemaking.
- 4. IAMU appreciates the Board and its staff for the effort that went into the proposed rules and looks forward to further participation in this Docket.

Respectfully submitted,

By: /s/ Alexander J. Cutchey

Alexander J. Cutchey, AT0014203 Director of Government Affairs

Iowa Association of Municipal Utilities

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ATTORNEY FOR THE IOWA ASSOCIATION OF MUNICIPAL UTILITIES

CERTIFICATE OF SERVICE

I hereby certify that I have filed this pleading with the Iowa Utilities Board through the Electronic Filing System (EFS) this August 9, 2021.

/s/ Alexander J. Cutchey