



*Geri D. Huser, Chair
Richard W. Lozier, Jr., Board Member
Joshua J. Byrnes, Board Member*

December 14, 2021

Mr. Andrew Cardon
Managing Corporate Counsel
Alliant Energy
200 First Street SE
P.O. Box 351
Cedar Rapids, IA 52406-0351

Ms. Melissa Mommsen
Attorney for the City of Preston
131 W. Gillet Street
P.O. Box 69
Preston, IA 52069

RE: Docket No. SPU-2021-0015

Dear Mr. Cardon and Ms. Mommsen:

On November 22, 2021, Interstate Power and Light Company (IPL) and Preston Municipal Utilities (PMU), filed a Joint Petition for Adjustment of Service Territory (Petition). IPL and PMU jointly request that the existing electric service territory boundary lines be moved from their current locations to represent the areas currently being served by IPL and PMU.

As part of Utilities Board (Board) staff review of the filing, an initial mapping of the proposed boundary modifications was performed. Attached to this staff letter is a map (Attachment A) that illustrates IPL and PMU's proposed boundary modifications. The proposed modifications have been placed as a layer on top of the Board's current mapping data.

Staff has identified four areas (labeled in blue as "AREAS #1-4" on Attachment A) that show mapping data inconsistencies when comparing IPL's and PMU's mapping data against the Board's mapping data.

AREA #1:

As proposed in the Petition and supporting documents, IPL and PMU mutually agree that PMU will serve the area marked by the dashed pink boundary line. The map shows that PMU (tan color) is already serving a portion of the service area proposed to be modified.

Explain this data discrepancy. Specifically, do the parties agree with the modification as proposed in Attachment A? If not, provide an explanation to the contrary.

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AREA #2:

As proposed in the Petition and supporting documents, IPL and PMU mutually agree that IPL will serve the area marked by the dashed red polygon. The map shows this dashed red polygon which will change from PMU (tan color) to IPL (lavender color).

Do the parties agree with this proposed modification as plotted in Attachment A? If not, provide an explanation to the contrary.

AREA #3:

As proposed in the Petition and supporting documents, IPL and PMU mutually agree that IPL will serve the area marked by the dashed red boundary line. The map shows that IPL (lavender color) is already serving the area proposed to be modified.

Explain this data discrepancy. Specifically, do the parties agree with the modification a proposed in Attachment A? If not, provide an explanation to the contrary.

AREA #4:

IPL and PMU filed a PDF aerial map labeled "Interstate Power and Light Company and Preston Municipal Utilities Electric Service Territory Realignment." This map shows elongated polygons that weren't identified by legal description/parcel information in the Petition or supporting documents.

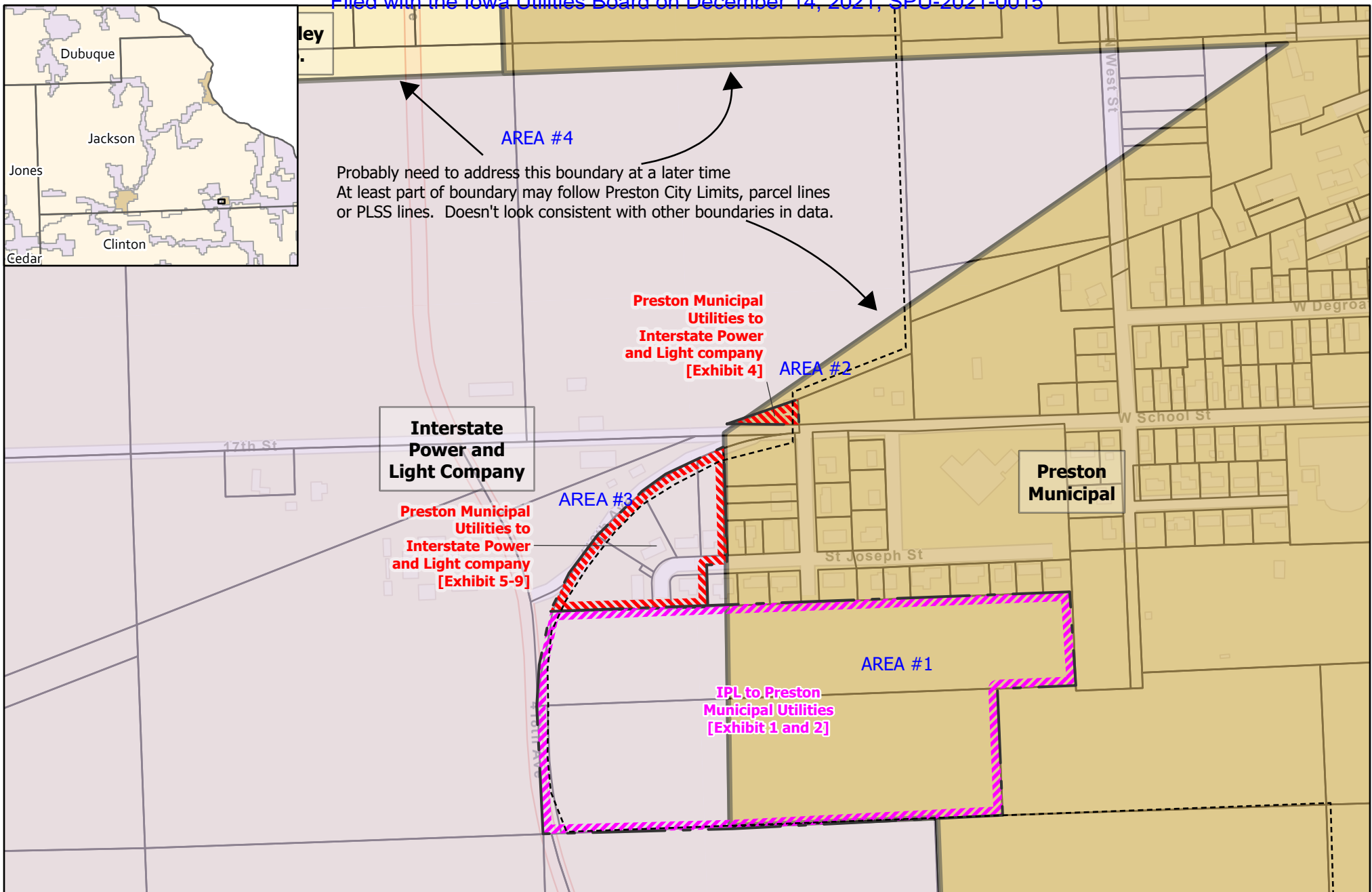
Provide an explanation of this identified area. If the area identified is a proposed modification, provide the legal description/parcel information.

Board staff requests IPL and PMU provide a response, within five days of this letter, to the discrepancies mentioned above.

Sincerely,

/s/ Trisha Quijano

Trisha Quijano, Utility Analyst
Regulatory Analysis



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IPL and Preston Municipal Utilities Proposed Adjustment of Service Territory

Exhibits(s): 1,2 (IPL to Preston), 3-9 (Preston to IPL)

Some portions of Preston to IPL territory change are already reflected in IUB data

0 0.04 0.08 0.16 Miles



- Change to REC
- Change to Elect. Utility
- Interstate Power and Light Company
- Municipal
- REC
- Parcels 2020
- City Limit