

**STATE OF IOWA  
DEPARTMENT OF COMMERCE  
BEFORE THE IOWA UTILITIES BOARD**

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**IN RE:**

**INTERSTATE POWER AND LIGHT  
COMPANY and PRESTON MUNICIPAL  
UTILITIES**

**DOCKET NO. SPU-2021-0015**

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**JOINT RESPONSE TO BOARD STAFF CORRESPONDENCE**

Interstate Power and Light Company (IPL) and Preston Municipal Utilities (PMU) hereby submit this joint response to the Staff Correspondence of Trisha Quijano, Utility Analyst, of the Iowa Utilities Board (Board) Regulatory Analysis Section, filed in the above-referenced docket on December 14, 2021. The numbered sections below correspond to the numbered sections in the Staff Correspondence.

**AREA #1**

The Staff Correspondence noted the following:

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.

**RESPONSE:**

The shapefile IPL submitted in this filing should be used for IUB mapping. Specifically, Area #1 identified in the Attachment A from the Board, should not include the area in tan color (PMU territory) but only reflect the IPL territory within the pink dashed polygon. See Attachment 1 to this document.

**AREA #2**

The Staff Correspondence noted the following:

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.

**RESPONSE:**

The Board is correct, the parties agree with the proposed modification as plotted in the Board's Attachment A reflected by the dashed red polygon.

**AREA #3:**

The Staff Correspondence noted the following:

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 as proposed in Attachment A? If not, provide an explanation to the contrary.

**RESPONSE:**

The Board is correct, the parties agree with the proposed modification as plotted in the Board's Attachment A, reflected by the dashed red polygon. At the time the shapefile that was submitted was created, Area #3 was in PMU territory. IPL added the Board's new web map as a layer in its GIS application and it feeds live into IPL's GIS application.

**AREA #4:**

The Staff Correspondence noted the following:

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.

**RESPONSE:**

It is not the Parties' intention to include these elongated polygons in this filing as areas that are to be exchanged. IPL was identifying areas where the new online GIS map does not match up to the official color PDF Electric Service Territory Map. (Please see Attachment 1 to this document). Because the official color PDF Electric Service Territory Map is the official source and correctly depicts the service boundaries, no modification is needed. However, the online GIS map will need to be adjusted to accurately reflect the official territory boundaries. Preston Municipal Utilities (PMU) has authorized IPL to represent that PMU does not object to this description of the situation.

DATED this 21<sup>st</sup> day of December, 2021.

Respectfully submitted,

PRESTON MUNICIPAL UTILITIES

INTERSTATE POWER AND LIGHT  
COMPANY

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Zoomed view of shapefile IPL submitted to support Docket SPU-2021-0015 for quick reference.



Zoomed area to be exchanged identified in the shapefile sent to the IUB.  
(Identified as Areas #1, #2 and #3 in IUB's "Attachment A")





**Area #4**

Elongated Areas identify where the Board's New GIS Map does not agree with the previous paper PDF color Electric Service Territory Maps.

The new GIS map should be corrected in these areas.



Below should also be a part of **Area #4**

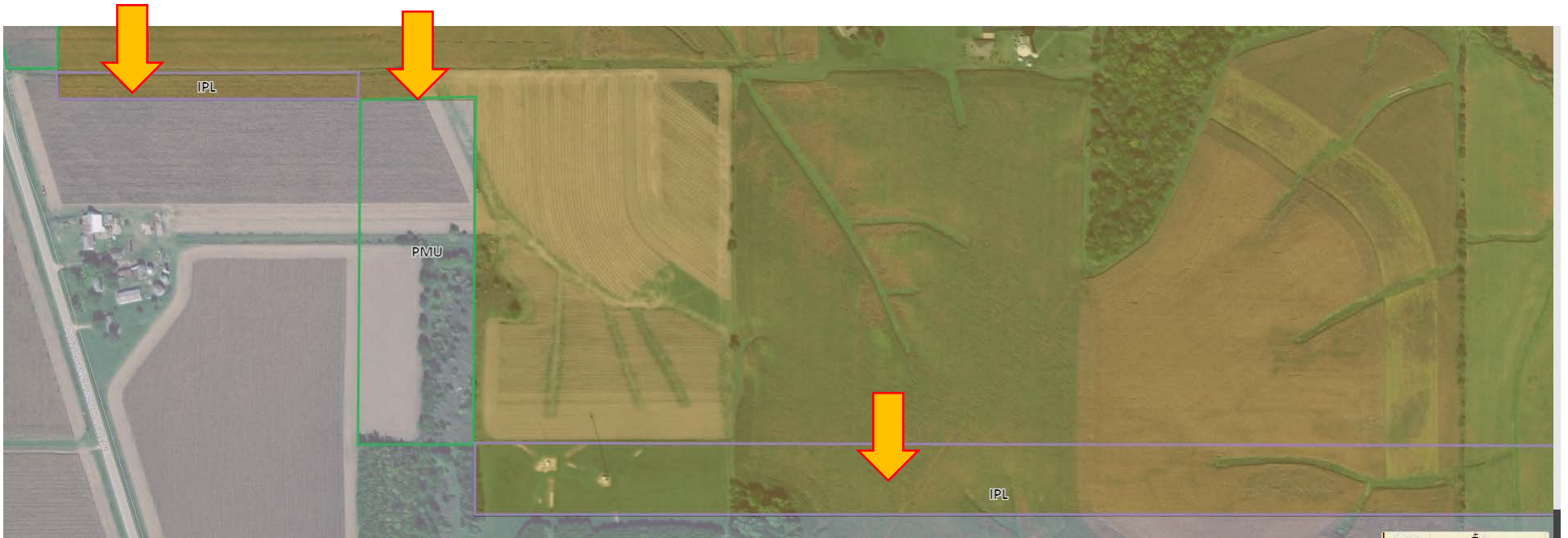


Exhibit C in filing in Docket SPU-2021-0015

**Preston Municipal Eastern**

**RED - IPL Territory to PMU**  
**Yellow - PMU Territory to IPL**

**Sections 28, 29 and 32**  
**T-84N, R-05E**

**R05E**

**Legal Descriptions**  
 Section 28 - A Part of the Southeast 1/4 of the Southwest 1/4 - Exhibit 3  
 Section 29 - A Part of the Southeast 1/4 of the Southwest 1/4 - Exhibit 4  
 Section 32 - A Part of the Northeast 1/4 of the Northwest 1/4 - Exhibits 1 and 2, Exhibits 5 - 9