

STATE OF IOWA
BEFORE THE IOWA UTILITIES BOARD

IN RE: INTERSTATE POWER AND LIGHT COMPANY and PRESTON MUNICIPAL UTILITIES	DOCKET NO. SPU-2021-0015
--	---------------------------------

**JOINT RESPONSE TO BOARD STAFF CORRESPONDENCE
DATED JANUARY 24, 2022**

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) Regulatory analysis section, filed in the above-referenced docket on January 24, 2022 (Staff Correspondence).

In response to the Staff Correspondence, IPL and PMU state as follows:

The Staff Correspondence noted the following:

Board staff requests that IPL and PMU review the attached map and respond...as to whether the map with the newly proposed modifications, including Area #4 is accurate. If IPL and PMU find the attached map to be inaccurate, the parties should file that information in the docket and identify the inaccuracies along with suggested corrections.

RESPONSE:

IPL and PMU respond that the map attached to the correspondence accurately depicts how their respective service territory boundary lines should exist following the resolution of this proceeding, with regard to the geographic area depicted on that map.

However, IPL and PMU state that the map attached to the Correspondence is focused on only a portion of the transfer areas subject to this petition, and omits

a parcel that IPL is currently serving in PMU's service territory east of the City of Preston, which PMU is transferring to IPL. The address for this parcel is 44180 17th Street, Preston, and is identified in Exhibits 3A and Exhibit 3B of the Joint Petition for Adjustment of Service Territory. As discussed at the video conference, the area to the east of the City of Preston also involved locations where IPL and PMU believe that the GIS map was incorrectly displaying the locations of the territory boundary lines that had been ordered by the Board previously. Although the map attached to the Staff Correspondence did not include this area, IPL and PMU reviewed the GIS map for this parcel as of February 7, 2022, and believe the GIS map accurately reflects the boundary line previously ordered by the Board.

The Staff Correspondence also noted the following:

“Board staff held a video conference call on January 21, 2022, to allow IPL, PMU, OCA, and the Office of the Chief Information Officer (OCIO), the Board's mapping vendor, to review the map and provide comments...Discussion ensued about the Board's GIS map and the PDF maps that were used prior to the GIS mapping tool. For clarity purposes, Board staff stated that the Board's GIS map is the official map of Iowa's electric service territories, and in order to resolve the mapping discrepancy in Area #4 in this docket and in future dockets, the parties must refer to the GIS map as the 'official' map of electric service territories.”

RESPONSE:

IPL and PMU thank Board Staff, OCIO staff, and the OCA for the time and attention paid to this matter at the video conference held on January 21, 2022. However, IPL's and PMU's position is that referring to the GIS map as the “official” map would be legally incorrect, and would cause further confusion among utilities regarding their respective service territory boundary lines. The service territory boundary lines depicted on the PDF maps were established pursuant to Docket No. RMU-78-11. Pursuant to Iowa Code § 17A.15(1), the boundary lines in the

maps were a “final decision.” Therefore, pursuant to Iowa Code § 476.25(1), the boundary lines set forth in the PDF maps constitute the boundaries of an electric utility exclusive service area previously established by the Board. As such, they may only be modified by the Board “on its own motion or at the request of an electric utility or municipal corporation, after notice and opportunity for hearing...if this modification...is found to be in the public interest.” Because no such motion, notice, opportunity for hearing, nor finding of public interest was made between the time that the Board established these boundaries in Docket No. RMU-78-11 and the present, any action performed in displaying the boundary lines in the GIS map does not confer “official” status upon the GIS map. Moreover, to act as if that were the case would cause confusion among utilities, which rely upon the maps approved by the Board in coordinating their service to customers.

Dated this 7th day of February, 2022.

Respectfully submitted,

INTERSTATE POWER AND LIGHT
COMPANY

By: /s/ Andrew D. Cardon
Andrew D. Cardon
Managing Corporate Counsel
200 First Street S.E.
P.O. Box 351
Cedar Rapids, IA 52401
Telephone: (319) 786-4236
andrewcardon@alliantenergy.com

PRESTON MUNICIPAL UTILITIES

By: /s/ Melissa Burken Mommsen
Melissa Burken Mommsen
Attorney at Law, P.C.
131 West Gillet Street
P.O. Box 69
Preston, IA 52069
Telephone: (563) 689-3456