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Honorable IUB and OCA members,

This filing is to present to the IUB and OCA questions and concerns regarding the proposed IPL rate making docket RPU-2021-0003 and the requests for generation certificates for DAEC I, II, and III (GCU-2021-0002, GCU-2021-0003, GCU-2021-0004). My question is who is protecting the taxpayer and more specifically IPL consumers? The transition to renewable energy is costing the customers that can least afford an increase in energy costs the most. The taxpaying customers are bearing the costs of tax credits and subsidies to the utilities, the passed-on costs from businesses that pay taxes and support subsidies and tax credits, the cost to buyout the Alliant/DAEC Nextera purchase power agreement ($110M), the as yet to be determined cost to build the solar facilities, BESS (battery installation) and any associated distribution/transmission, and then a projected rate increase for both business and consumer which business will also pass on to the consumer.

SPU-2018-0008 resulted in the early shutdown of DAEC nuclear (licensed to 2034) and early buyout of IPL's PPA with Nextera Energy. The $110 million buyout cost is being passed on to IPL customers as a cost adjustment until 2025 or 2026 depending on when the 5-year period ends. The buyout was said (per Kitchen testimony on July 27, 2018 SPU-2018-0008) to be expected to provide a $300 million cost saving to IPL customers. That $300 million savings averages out to $60 million a year. IPL filed the Annual Information Report for SPU-2018-0008 April 1, 2022 as required to report the costs and savings associated with the DAEC PPA termination, the recovery of the buyout payment, and the repower PPAs. This document states that for the period ending December 31, 2021 there was a net cumulative customer savings or benefit of approximately $47.5 million. This is short of the IPLs predicted or anticipated $52.3 million. Is this trend expected to continue? Was the PPA buyout a sound business decision? The PPA with Nextera was a fixed price contract for the energy DAEC nuclear provided. The price of natural gas, in 2018, was cheap. With the increase in the price of natural gas and the underperformance of the repowered wind turbines was the decision to shut down a clean, reliable baseload plant coupled with the additional cost to build intermittent power solar facilities in the best interest of the public and the consumer?

IPL filed additional information to RPU-2021-0003 April 1, 2022. IPL provided answers to specific questions asked on March 11, 2022 by the IUB:

Question 2: on page 2 asks IPL for total estimated project costs to build each proposed facility. IPL's response is that "itemized estimates of the construction cost for each of the projects is not reasonably available to IPL." Is it in the consumers best interest to allow a public utility to pass on costs that the utility cannot accurately project?

Question 6: on page 4 asks what rate of inflation was used in establishing the projected costs and cost cap and how the inflation rate was determined. IPL responded that only a labor inflation rate of 3% was included in cost estimates. Currently inflation rates are running at between 6 and 10%. This is another example of not being able to accurately estimate costs that would be passed on to consumers.

Question 10: on page 7 asks for an explanation and schedule for how and when IPL is planning to recover the revenue requirement of the tax equity partnership. Include the recovery plan for the tax equity partnership both prior to and after IPL's planned purchase of the tax equity investor's remaining ownership stake. IPL states that" upon IPL's anticipated purchase of the tax equity investors' remaining ownership state IPL currently anticipates that the recovery of revenue requires for the projects will revert to traditional cost recovery mechanisms through base rates of the Renewable Energy Rider and the Energy Adjustment Clause, or other appropriate cost recover mechanisms available at that time." IPL customers will pay for this using the available methods to the utility.

Question 13: on page 8 asks for an estimate of the increase in customers' overall bill once the projects have been included in rates, an explanation as to why this project is being considered when the projects costs are so much greater than the benefits, and the decommission costs included in the net levelized customer costs. IPL's response to how much it will cost customers is "it depends on many factors." Numbers are provided in the following paragraphs but are blanked out as confidential information. Customers should have the right to know, before the project is approved, how much the projects will add to their bills. Currently, Nextera filed to use salvage value of the panels at the end of life to offset decommissioning costs. Linn County refused to allow Clenera, a recently approved project, to use salvage value as part of decommissioning and will required a bond. If provisions are not made for decommissioning it is the ratepayers that will pay this cost as well.

Question 21: on page 15 "provide a summary with the current market conditions for PPAs in MISO and an explanation containing similar commercial characteristics as the project. As part of the summary, include a total and a per MWh Net Levelized Customer Cost comparison between the proposed projects and a potential PPA with similar commercial characteristics." IPL state that "market conditions across the US are challenging right now due to policy and commodity issues." While the number range is confidential the understanding is prices across the board are rising.

Question 26: on page 17 asks for an estimate of the generator interconnect study and agreement costs and network upgrades that may be required for DAEC II and the other 200MW solar project. IPL's response is partly confidential. IPL does note "the transmission and interconnection costs of the projects potentially available for acquisition vary significantly. IPL continues to seek out projects that will have minimal to modest impact on the transmission system in Iowa." This reads as another we cannot tell you how much this will cost the customer.

Question 27: on page 18 asks if IPL plans to adopt the decommissioning plan provided by Nextera in GCU-2021-0002 and GCU-2021-0003. IPL responded that it will adopt the decommissioning plan in the aforementioned dockets. Linn County did not allow Clenera, in the Coggon solar filing, to use salvage value as part of the decommissioning costs. Again, a bond should be required to protect the consumer given that Alliant intends to purchase this project as an LLC.

The Large Energy Group, comprised of 18 local businesses, filed for intervention in this rate case. There are commercials, editorials. And social media pages that state if we want new business to come to

Iowa we need to transition to renewable energy and the sooner the better. But at what cost? Just how much more do you think IPL business customers will be willing to pay? IPL customers already pay 6 or 7 cents more per kwh for their energy than do the local REC customers. That is 70% more before any further rate increases. IPL/Alliant customers pay more than WPL (Wisconsin Power and Light). Why is that? Perhaps poor decisions on the part of Alliant? IPL customers do not have options when it comes to who they receive their power from. IPL is an energy monopoly in its service territory. The customers hurt the most by this are the customers least able to afford it.

This is Tamara Marcus, Linn County's sustainability manager speaking: January 11, 2021 to Little Village publication: Last month, the Linn County Board of Supervisors adopted a climate resolution that calls for the prioritization of the voices of vulnerable communities in Linn County's climate action process it created in 2019, after passing a resolution declaring a climate in crisis in the county and establishing seven targets for climate action. The newest resolution includes lessons learned from the COVID-19 pandemic and derecho. Vulnerable communities defined in the resolution include "residents of color; low-income, disabled, and elderly residents; rural residents, and immigrant and refugee residents." Should IPL's vulnerable customers be required to pay for poor business/management decisions by IPL?

Sincerely,

Laura Myres