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November 1, 2022

Executive Secretary
Iowa Utilities Board
1375 East Court Avenue
Des Moines, IA 50319-0069

RE: Interstate Power and Light Company
Docket No. EEP-2022-0150
Application for Approval of Energy Efficiency Plan
Application for Confidential Treatment

Dear Executive Secretary:

Enclosed please find Interstate Power and Light Company's (IPL) Application for Approval of Energy Efficiency Plan (Application), as filed today with the Iowa Utilities Board (Board). IPL is filing its Application pursuant to the requirements of Chapter 476 of the Iowa Code (2022) and 199 Iowa Administrative Code (IAC) 35.

Also filed herewith is a copy of IPL's Application for Confidential Treatment and Affidavit in Support of Application for Confidential Treatment. The confidential information described in the Application for Confidential Treatment is labeled CONFIDENTIAL pursuant to 199 IAC 1.9.

IPL respectfully requests the Board issue a procedural schedule in this docket allowing for the approval of IPL's Energy Efficiency Plan so that it may be effective on or before January 1, 2024.

Respectfully,

/s/ Matthew J. Sowden
Matthew J. Sowden
Corporate Counsel

STATE OF IOWA
BEFORE THE IOWA UTILITIES BOARD

IN RE: INTERSTATE POWER AND LIGHT COMPANY	DOCKET NO. EEP-2022-0150
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APPLICATION FOR APPROVAL OF ENERGY EFFICIENCY PLAN

COMES NOW, Interstate Power and Light Company (IPL), pursuant to the Final Order issued on March 26, 2019, by the Iowa Utilities Board (Board) in Docket No. EEP-2018-0003 directing IPL to file a new Energy Efficiency Plan (Plan) on or before November 1, 2022, and files its Application for Approval (Application) of its 2024-2028 Energy Efficiency Plan (Plan). In support of its Application, IPL states as follows:

1. Introduction. IPL's Plan is a continuation of and builds upon IPL's proud history of offering comprehensive energy efficiency solutions for its customers. Together, the programs described in this Plan continue to support IPL's role as a leading provider of cost-effective, customer-focused energy efficiency and peak load reduction programs by offering diverse program engagement options, incentives that help reduce customers' barriers to adopting energy-saving equipment, and outreach and education to increase their awareness and knowledge of the benefits of saving energy and options to participate in IPL's programs.

IPL's Plan recognizes changes in the marketplace from its 2019-2023 Plan. The Plan also continues the process of aligning IPL's energy efficiency portfolio

with its longer-term resource needs. IPL's Plan describes a comprehensive portfolio of energy efficiency and demand response programs that will offer customers a range of residential and nonresidential electric and natural gas saving measures, and that includes ongoing efforts to educate customers, trade allies, and stakeholders about the benefits of and opportunities for saving energy. The Plan also sets realistic savings targets for IPL's programs, introduces enhancements to individual programs, and incorporates new programs, technologies, and initiatives.

2. Statutory Authority. IPL is a rate-regulated public utility as defined in Iowa Code § 476.1 and is therefore subject to the Board's jurisdiction. IPL is filing this Application pursuant to Iowa Code §§ 476.6(13) and (15) (2022) and 199 Iowa Administrative Code (IAC) Chapter 35. Iowa Code § 476.6(13) requires electric and gas public utilities to offer energy efficiency programs to their customers through an energy efficiency plan, and that the plan as a whole be cost-effective. Iowa Code § 476.6(15) generally outlines the content and process for approval of utilities' energy efficiency plans. IPL's Plan, submitted with this Application, is designed to incorporate and satisfy these statutory mandates.

3. Collaboration. Throughout the planning and development of the Plan, IPL has pursued opportunities to inform stakeholders of its progress and solicit input. IPL has had frequent formal and informal communications with multiple parties, including: other Iowa investor-owned utilities (IOUs), specifically MidAmerican Energy Company (MEC) and Black Hills Energy (BHE); the Iowa Utilities Association (IUA); Office of Consumer Advocate (OCA); environmental

and industry advocates; community-based organizations; trade organizations and trade allies; and energy-efficiency program contractors.

4. IPL's Energy Efficiency Plan. IPL has significantly redesigned its energy efficiency program strategy. IPL's proposed Plan will simplify customer engagement by grouping like offerings under larger, more diverse umbrella programs so that customers can find everything they need to reduce energy consumption and demand. The Plan will offer just five programs under a simplified structure designed around common customer needs: energy-efficient products, energy efficiency services, low-income support, demand response, and education. Each program comprises individual components and pathways as outlined in Table 1 – Portfolio Structure.

TABLE 1 – Portfolio Structure



5. Cost-Effectiveness Tests. Iowa Code § 476.6(13) provides that “[i]n determining the cost-effectiveness of an energy efficiency plan, the Board shall apply the societal test, total resource cost test, utility cost test, rate payer impact test, and participant test.” IPL’s Plan includes a thorough analysis of all the requisite statutory tests, and presents those results for the Board’s consideration.

6. Assessment of Potential. The process for developing the Plan began with the Assessment, a collaborative research project on behalf of the three IOUs. The Assessment identified and quantified the amount of energy that could be saved in each IOU’s service territory from 2024 through 2028 from efficient technologies and practices that are widely commercially available, accounting for known changes in codes and standards and other market trends. For both energy efficiency and demand response, the potential study team analyzed three potential scenarios—Reference Existing, Reference New, and High—which assume increasingly expanded programs.

7. Program Design. In the second development phase of the Plan, IPL sought to create streamlined, integrated programs that generate energy savings and demand reduction, improve IPL’s ability to respond to capacity needs, and achieve high customer and trade ally satisfaction. This phase drew heavily on: the results of the Assessment; Company-specific data relating to avoided costs; customer forecasts; rates; and many other input parameters. IPL used several guiding principles in developing this Plan:

- Comply with the requirements of 199 IAC Chapter 35.
- Provide customers with choice, convenience, and control over their energy consumption.

- Emphasize beneficial electrification and decarbonization while continuing to give customers a choice of fuels.
- Prioritize programs that improve the housing stock and reduce energy burden among historically underserved communities, especially low- and limited-income customers and small businesses.
- Offer integrated demand response and energy efficiency programs that work in concert to improve grid reliability and flexibility.
- Engage and collaborate with dealers, customers, regulators, nongovernmental organizations, industry groups, and other IOUs to achieve stakeholder consensus to the extent possible.
- Establish IPL as a trusted source of information about energy-efficient products and behavior for customers and trade allies.
- Contribute to local and regional economic growth.

IPL is well-positioned to deliver programs that will meet customers' needs and fulfill the Plan objectives and regulatory obligations.

8. Contents of Plan. The Plan is organized as prescribed by the Board. See the attached **Cross Index to Board Rules** for details regarding which IPL witness and Exhibit address each of the requirements of 199 IAC Chapter 35.

9. Witnesses. Kari T. Gehrke, Manager, Demand Side Management, provides testimony in support of the overall Plan. Additionally, IPL offers the following witnesses:

- Amy W. Ellsworth, Principal, The Cadmus Group;
- Aquila K. Velonis, Senior Associate, The Cadmus Group; and

- Adrienne L. Iano, Senior Regulatory Relations and Policy Consultant

10. Conclusion. IPL's Plan recognizes the changing energy efficiency marketplace and offers options for IPL's customers, allowing IPL to continue its history of providing effective energy efficiency solutions for its customers. The Plan meets the requirements of the Iowa Code and 199 IAC Chapter 35 and should be approved so that it can be implemented on or before January 1, 2024.

WHEREFORE, Interstate Power and Light Company respectfully requests the Board grant IPL's Application for Approval of its 2024-2028 Energy Efficiency Plan.

DATED this 1st day of November 2022.

Respectfully submitted,

**INTERSTATE POWER AND LIGHT
COMPANY**

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