ADDITIONAL COMMENTS OF
THE IOWA ASSOCIATION OF ELECTRIC COOPERATIVES
FOLLOWING CHARRETTE #1

COMES NOW the Iowa Association of Electric Cooperatives ("IAEC") and submits these additional comments following the completion of Charrette #1 in this Docket. The initial two-day Policy Charrette #1 was conducted on August 30 and 31, 2023 to address element number 1. This element was identified in the Order Establishing Schedule and Delegating Authority issued August 7, 2023 ("Order") as "an evaluation of the adequacy of current ratemaking law and procedure to promote the Policy Objectives." The Policy Objectives were identified in said Order as ensuring "safe, adequate, reliable and affordable utility service provided at rates that are nondiscriminatory, just, reasonable, and based on the utility's cost of providing service to customers within the state."

The IAEC, a trade association established to support the interests of member-owned electric cooperatives, participated in the two-day Charrette. The IAEC previously submitted a notice of intent to participate, noting that its members are not presently subject to the rate-regulation authority of the Iowa Utilities Board; but acknowledging that recommendations made to the Legislature through the work completed in this Docket may impact the members of the IAEC. Certain comments made by participants in the Charrette appear to indicate that some participants desire to expand the scope of this Docket to cover matters other than ratemaking. The IAEC
submits these additional comments within the timeline set forth in the Order to encourage the Iowa Utilities Board to keep the focus of these proceedings limited to the matters set forth in HF617.

The IAEC specifically notes that Charrette #1 included comments from some participants that seem to support allowing some types of customers to obtain their energy supply directly from the market, despite Iowa's exclusive service territory statute (Iowa Code 476.22 through 476.26). The IAEC deems such comments as aimed at an evaluation of statutory provisions that are outside the scope of these proceedings. Nevertheless, the IAEC submits these formal comments to express its support for the current and long-standing exclusive service territory law and note that any changes to such law could have significant ramifications on the provision of economical, efficient, and adequate electric service to the public. Any change in such statute would be within the purview of the Legislature and necessitate an evaluation of a broader set of Policy Objectives than those being evaluated herein.

Similarly, the IAEC notes that a significant number of stakeholders appeared to promote a requirement for integrated resource planning for electric utilities in Iowa, along with an apparent modification of planning standards from a reasonableness standard to a least-cost planning standard. The IAEC generally defers to the rate-regulated utilities for addressing specific recommendations; but encourages the Iowa Utilities Board to remain focused on ratemaking matters and procedures in this Docket and refrain from straying into resource planning subjects.

The IAEC appreciates the opportunity to participate in this Docket and applauds the Iowa Utilities Board on the process it has developed to solicit all stakeholder input. However, as noted above, the Iowa Utilities Board should recognize that certain stakeholders will undoubtedly attempt to utilize this process to advance their individual interests, whether within or outside the scope of the Iowa Utilities Board's directive from HF 617.
Dated this 8th day of September, 2023.

Respectfully submitted,

Iowa Association of Electric Cooperatives

By /s/ Dennis L. Puckett
Dennis L. Puckett
6601 Westown Pkwy., Suite 200
West Des Moines, Iowa 50266
Phone: (515) 247-4710
Email: dpuckett@sullivan-ward.com

ATTORNEY FOR IOWA ASSOCIATION OF ELECTRIC COOPERATIVES

CERTIFICATE OF SERVICE

I hereby certify that I have filed this pleading with the Board's Executive Secretary through the Electronic Filing System (EFS) this September 8, 2023.

/s/ Dennis L. Puckett