

STATE OF IOWA
BEFORE THE IOWA UTILITIES BOARD

IN RE:)	
)	
)	DOCKET NO. TF-2017-0294
)	
MIDAMERICAN ENERGY COMPANY)	PETITION FOR INTERVENTION AND
)	INITIAL COMMENTS
)	
)	

The Environmental Law & Policy Center (ELPC) and Iowa Environmental Council (IEC) (collectively “Environmental Intervenors”) request intervention in this matter pursuant to 199 Iowa Administrative Code § 7.13. In support of its position, Environmental Intervenors state:

1. ELPC is a non-profit corporation organized under Illinois law. ELPC has members who reside in the State of Iowa and an office in Des Moines. ELPC’s goals include promoting renewable energy and energy efficiency and advocating for policies and practices that facilitate the use, development and implementation of effective renewable energy and energy efficiency. ELPC has invested significant time and resources into promoting renewable energy and energy efficiency in Iowa and nine other states in the Midwest.

2. IEC is a non-profit corporation organized under Iowa law. IEC is a broad-based environmental policy organization with a mission to create a safe, healthy environment and sustainable future for Iowa. IEC represents a broad coalition of Iowans including over 70 diverse member and cooperator organizations ranging from agricultural, conservation, and public health organizations, to educational institutions, business associations, and churches, along with hundreds of individual members. IEC’s work focuses on clean water, clean air, conservation, and

clean energy, including the promotion of policies that would facilitate the development of clean energy and clean energy jobs.

3. On July 10, 2017, MidAmerican Energy Company (MidAmerican) filed a revised tariff with the Iowa Utilities Board (the Board) to “modify MidAmerican’s energy adjustment clause (“EAC”) to allow MidAmerican to retain the federal production tax credits (“PTCs”) if MidAmerican invests in repowering wind turbines in its generation fleet.”

4. MidAmerican’s filing was in response to the Board’s order in Docket No. DRU-2017-0002, which identified that MidAmerican needed to modify its tariff in order to retain PTCs from a repowered project.

5. Environmental Intervenors have a unique interest in protecting the environment, encouraging the use and development of clean energy, optimizing energy efficiency, and holding down the cost of electricity for consumers. Environmental Intervenors are supportive of the development of renewable energy generation and want such projects to be developed in a cost effective and replicable manner. Environmental Intervenors also have an interest in ensuring all customers can benefit from renewable generation and that individuals, companies, and other entities with sustainability and clean energy goals are able to meet those goals. As groups concerned about the larger policy framework to support renewable energy and energy efficiency, the interests of the Environmental Intervenors will not be adequately represented by any other party participating in this case, and consequently require representation in addition to the interests represented by the other parties.

6. Environmental Intervenors have reviewed MidAmerican’s filing and will offer brief initial comments below. In addition, Environmental Intervenors will participate in any docketed proceedings.

7. Environmental Intervenors will be represented in this docket by ELPC and communications concerning the petition should be directed to ELPC at its Iowa office. Joshua T. Mandelbaum is a resident attorney licensed to practice in Iowa and working out of ELPC's Des Moines office.

8. **MidAmerican's Repowering Proposal Will Benefit Customers and Renewable Energy Deployment in Iowa.** Iowa's early leadership on wind energy positions Iowa to lead on and benefit from repowering. Iowa saw significant wind development in the 2000s, including a number of wind projects by MidAmerican Energy that can now benefit from repowering. Because of that early wind development, Iowa currently has more wind capacity potential for repowering than almost any other U.S. state. As MidAmerican's May 12th DRU petition highlighted, one of the key benefits from repowering is a higher capacity factor for repowered turbines as a result of longer blades and more efficient nacelles. A recent press release on repowering by GE Renewable Energy identifies an increase in wind farm output by up to 25%, which is consistent with our preliminary estimates of the increased energy generation from this project (additional analysis may be helpful to better understand increases in both capacity factor and annual energy generation).¹ In addition to this benefit, repowering is expected to extend the operating life of wind turbines considerably. GE Renewable Energy identifies an extension in operating life of up to 20 years.² The higher capacity factor and extended operating life will provide significantly greater clean energy and environmental benefits from the repowered wind projects than if those projects are not repowered. In addition to energy benefits, MidAmerican outlines the important economic development benefits from repowering, including

¹ <http://www.genewsroom.com/press-releases/ge-adds-value-us-wind-turbine-industry-its-repower-offering-283781#>

² *Id.*

local job creation, local spending, and higher property tax revenue to counties associated with repowering construction and investment. We support MidAmerican's proposal to repower 706 GE turbines because of these clean energy, environmental, and economic benefits.

9. **A Tariff Proceeding is an Appropriate Type of Docket to Resolve the Issues MidAmerican Presents.** In the DRU docket, Environmental Intervenors raised concerns about the appropriateness of a DRU docket and the precedent that would set for future tariff interpretation questions. The filed EAC tariff modification does not raise the same concerns, and Environmental Intervenors think this docket is an appropriate proceeding to address the issues presented. Environmental Intervenors continue to support the timely resolution of issues in this docket to ensure the entire repowering project is eligible for 100% of the federal production tax credit.

WHEREFORE, Environmental Law & Policy Center and Iowa Environmental Council request leave to intervene and be treated as a party to the proceeding and submit the initial comments above.

Respectfully submitted this 31st day of July, 2017.

/s/ Joshua T. Mandelbaum
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**ATTORNEYS FOR INTERVENORS
ELPC AND IEC**