

EPB-2014-0150



Interstate Power and Light Co.
An Alliant Energy Company

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January 30, 2015

Jeffrey R. Webb
Director of Transmission Planning
Midcontinent Independent System Operator, Inc.
720 City Center Dr.
Carmel, IN 46032

**FILED WITH
Executive Secretary**

February 06, 2015

IOWA UTILITIES BOARD

RE: Attachment Y Application for M.L. Kapp Generating Station Unit 2

Dear Mr. Webb:

For the reasons outlined below, Alliant Energy, on behalf of Interstate Power and Light Company ("IPL"), submits the enclosed Attachment Y Application for the M.L. Kapp Generating Station Unit 2 (CPNode: ALTW.BVRCH2) ("Kapp") to the Midcontinent Independent System Operator, Inc. ("MISO").

IPL is currently undertaking steps to ensure compliance with the U.S. Environmental Protection Agency's Utility Mercury and Air Toxics Standards ("MATS"). Among the units within IPL's fleet that is subject to the MATS is M.L. Kapp Generating Station Unit 2 ("Kapp"). Kapp is a 210 MW unit, capable of operating on either coal or natural gas. While coal is the predominant fuel used at Kapp, it has historically used both coal and natural gas. Based upon an evaluation of options to comply with MATS at Kapp, IPL determined that the most-prudent option was to cease fueling Kapp with coal and solely fuel the unit on natural gas. IPL plans on finalizing the switch to solely fueling Kapp on natural gas by June 1, 2015. Following the switch to fueling Kapp solely on natural gas, Kapp's capacity will (at least initially) be limited to approximately 110 MW.¹ IPL is considering options to increase Kapp's output following the change to solely natural gas fueling.

¹ A generation verification test capacity ("GVTC") test of Kapp was conducted in December 2014 with Kapp solely fueled on natural gas. That test demonstrated 98.6MW; however, IPL believes the unit can perform at a higher output level during the summer of 2015 after the conversion. The results of that test will be submitted to MISO in February.

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Given that IPL has not made a permanent and final decision on the future output of this unit and the fact that the Attachment Y Application does not account for the reduction of a unit's capacity, it was believed that an Attachment Y request was not necessary. However, during a January 23, 2015 conversation between Mr. Neal Shah of MISO and Ms. Denise Faust of Alliant Energy, Mr. Shah recommended that IPL submit an Attachment Y application for Kapp in light of the expected change in capacity.

Consistent with that conversation and out of due caution, Alliant Energy hereby submits, on behalf of IPL, an Attachment Y Application, pursuant to Section 38.2.7a of the MISO Tariff, for Kapp. Specifically, Alliant Energy submits this Attachment Y Application for suspension of a portion of the current capacity of the unit. As the Attachment Y form is not designed for this type of situation, additional information regarding Kapp is provided here:

- Kapp currently operates on coal and gas at 210MW ICAP (Nameplate 218.5MW).
- To comply with MATS, IPL intends to switch the unit completely to natural gas by June 1, 2015.
- IPL expects the output level to be reduced to approximately 110MW ICAP when the unit is fully operational on natural gas.
- IPL has future alternatives to evaluate, which may increase the capacity output at the unit, therefore is requesting the suspension as to not lose permanent interconnection rights. These alternatives will be evaluated during the time of suspension.

While the notice identifies a suspension period from July 31, 2015 through December 31, 2016, Alliant Energy, due to the unique situation surrounding this notice, seeks an expedited review of the application. Specifically, Alliant Energy respectfully requests that MISO to complete its review by May 1, 2015, which will allow the company ample time to finalize the switch to natural gas-only fueling by June 1, 2015.

Thank you for your assistance with this matter. If you have any questions regarding this application, please contact Denise Faust, Director Energy Market Operations and Resource Planning, at denisefaust@alliantenergy.com or (608) 458-3454.

Sincerely,



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Terry L. Kouba
VP Generation Operations

MISO
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ATTACHMENTS

ATTACHMENT Y
Notification of Potential Resource/SCU Change of Status
30.0.0

ATTACHMENT Y

Notification of Potential Generation Resource/SCU Change of Status

This is a notification of potential change of Generation Resource or Synchronous Condenser Unit ("SCU") status in accordance with Section 38.2.7.a of the Tariff. An electronic copy of the completed form will be accepted by the Transmission Provider, however, a form will not be considered complete until the original form containing an original signature, including all attachments, is received by the Transmission Provider at the following address: MISO, Attention: Director of Transmission Planning; 720 City Center Drive, Carmel, IN 46032.

The Transmission Provider may request additional information as reasonably necessary to support operations under the Tariff.

Name of Market Participant owning and/or operating the Generation Resource or Synchronous Condenser Unit ("SCU")

Alliant Energy Corporate Services, Inc./Interstate Power and Light Co.

Type of interest in Generation Resource or SCU:

- Owner of Generation Resource/SCU
- Operator of Generation Resource/SCU

Market Participant's state of organization or incorporation **AECS: Wisconsin – IPL: Iowa**

Generation Resource/SCU [plant and unit number(s)] **ALTW.BVRCH2**

Effective On: November 19, 2013

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Market Participant has definitely decided and hereby certifies that it will [check one]

[] decommission and retire the Generation Resource/SCU commencing on __ [day] of _____ [month] of _____ [year].

[X] Suspend (**See below for specific request**) for economic reasons operation of the Generation Resource/SCU commencing on __ [day] of _____ [month] of _____ [year] and will resume operations on __ [day] of _____ [month] of _____ [year].

IPL is requesting to suspend a portion of the output of the Kapp Generating Station as the company has decided and hereby certifies that the unit is currently operated on coal and gas, and is being transitioned to operate on natural gas only. In the planned gas configuration, the unit will be limited to 110MW ICAP.

The Generation Resource/SCU is further described as follows:

Location: 2001 Beaver Ch Pkwy, Clinton, IA 52733

Unit Name: **M.L. Kapp Unit 2** CPNode: **ALTW.BVRCH2**

Nameplate Capacity in MW: **218.5 (1967)**

Revenue Meter Location (Use Resource IDs): **ALTW.BVRCH2**

Market Participant understands and agrees that this notification is binding as provided under Section 38.2.7 of the Transmission Provider's Tariff and will not be made public by the Transmission Provider except as provided for under Section 38.2.7.a of the Tariff.

The undersigned certifies that he or she is an officer of the Market Participant that owns or operates the Generation Resource/SCU, that he or she is authorized to execute and submit this notification on behalf of Generation Resource/SCU, and that the statements contained herein are true and correct.

Signature: _____

Name: Terry L. Kouba

Title: Vice President – Generation Operations

Date: January 30, 2015

Effective On: November 19, 2013

MISO
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ATTACHMENTS

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30.0.0

STATE OF Wisconsin

COUNTY OF Dane

Before me, the undersigned authority, this day appeared [REDACTED], known by me to be the person whose name is subscribed to the foregoing instrument, who, after first being sworn by me deposed and said:

“I am an officer of Interstate Power and Light Company, I am authorized to execute and submit the foregoing notification on behalf of Interstate Power and Light Company, and the statements contained in such application are true and correct.”

SWORN TO AND SUBSCRIBED TO BEFORE ME, the undersigned authority on this the 29th day of January, 2015.



[REDACTED]

Notary Public, State of WI

My Commission expires 10/20/18

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Alliant Energy Corporate Services, Inc./Interstate Power and Light Co.

Type of interest in Generation Resource or SCU:

Owner of Generation Resource/SCU

Operator of Generation Resource/SCU

Market Participant's state of organization or incorporation **AECS: Wisconsin – IPL: Iowa**

Generation Resource/SCU [plant and unit number(s)] **ALTW.BVRCH2**

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Market Participant has definitely decided and hereby certifies that it will [check one]

[] decommission and retire the Generation Resource/SCU commencing on ___ [day] of _____ [month] of _____ [year].

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IPL is requesting to suspend a portion of the output of the Kapp Generating Station as the company has decided and hereby certifies that the unit is currently operated on coal and gas, and is being transitioned to operate on natural gas only. In the planned gas configuration, the unit will be limited to 110MW ICAP. The suspension period requested is from July 31, 2015 through December 31, 2016.

The Generation Resource/SCU is further described as follows:

Location: 2001 Beaver Ch Pkwy, Clinton, IA 52733

Unit Name: M.L. Kapp Unit 2 CPNode: ALTW.BVRCH2

Nameplate Capacity in MW: 218.5 (1967)

Revenue Meter Location (Use Resource IDs): ALTW.BVRCH2

Market Participant understands and agrees that this notification is binding as provided under Section 38.2.7 of the Transmission Provider's Tariff and will not be made public by the Transmission Provider except as provided for under Section 38.2.7.a of the Tariff.

The undersigned certifies that he or she is an officer of the Market Participant that owns or operates the Generation Resource/SCU, that he or she is authorized to execute and submit this notification on behalf of Generation Resource/SCU, and that the statements contained herein are true and correct.

Signature: _____

Name: Terry L. Kouba
Title: Vice President – Generation Operations
Date: January 30, 2015

Effective On: November 19, 2013

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FERC Electric Tariff
ATTACHMENTS

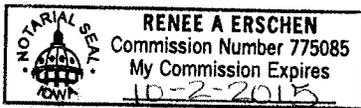
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30.0.0

STATE OF Iowa
COUNTY OF Subuque

Before me, the undersigned authority, this day appeared [redacted] known by me to be the person whose name is subscribed to the foregoing instrument, who, after first being sworn by me deposed and said:

“I am an officer of Interstate Power and Light Company, I am authorized to execute and submit the foregoing notification on behalf of Interstate Power and Light Company, and the statements contained in such application are true and correct.”

SWORN TO AND SUBSCRIBED TO BEFORE ME, the undersigned authority on this the 3 day of February 2015.



[redacted]
Notary Public, State of Iowa
My Commission expires 10-2-2015