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STATE OF IOWA
BEFORE THE IOWA UTILITIES BOARD

FILED WITH
Executive Secretary
August 07, 2014
IOWA UTILITIES BOARD

IN RE: INTERSTATE POWER AND LIGHT COMPANY	DOCKET NO. EPB-2014-0150
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DIRECT TESTIMONY OF WENDY HIEB

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WITNESS IDENTIFICATION

Q. Please state your name and business address.

A. My name is Wendy Hieb. My business address is Iowa Department of Natural Resources, 502 East 9th Street, Des Moines, Iowa 50319.

Q. By whom are you presently employed and in what capacity?

A. I am employed by the State of Iowa, Department of Natural Resources, as an Environmental Specialist Senior within the Water Quality Bureau of the Environmental Services Division. I am the lead technical worker for industrial National Pollutant Discharge Elimination System (NPDES) permitting in Iowa. This includes issuing NPDES permits, conducting rulemaking, coordinating permit writer activities, and determining how to implement new state and federal regulations under the Clean Water Act.

Q. What is your educational background?

A. I received a Bachelor of Science degree in Wildlife Ecology and Conservation from the University of Florida in May 1999. I received a Master of Science degree from the University of Minnesota in Water Resources Science in May 2005.

Q. Please describe your professional experience.

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1 A. I have eleven years of regulatory experience and four years of research experience.
2 From 1999 to 2001, I worked as an Analyst for the Cadmus Group, a consulting firm
3 for EPA Headquarters. I provided assistance on a variety of projects including
4 hydraulic fracturing studies, state Underground Injection Control regulation reviews,
5 and summarizing national results for state Source Water Assessment Program
6 surveys. From 2001 to 2004, I was a research assistant and teaching assistant for the
7 University of Minnesota Duluth which included microbiology research and teaching a
8 variety of biology labs. From 2004 to 2006, I was a project manager for Computer
9 Sciences Corporation. I was in charge of a program to review world-wide published
10 toxicology studies and summarize data for EPA's effort to re-register pesticides based
11 on updated risk assessments. From 2006 to 2014, I was an Environmental Specialist
12 with the Iowa Department of Natural Resources' Water Quality Bureau, drafting and
13 issuing industrial NPDES permits and wastewater operation permits for land
14 application; assisting in rulemaking efforts for general permits; providing support to
15 industries with the regulatory process; responding to public comments; and providing
16 input and keeping current with new standards and policies. Beginning in March of
17 2014, I was promoted to Environmental Specialist Senior in the Water Quality
18 Bureau, which is the lead technical staff position that coordinates all wastewater
19 permitting efforts for industries. This includes issuing NPDES permits; rulemaking;
20 working closely with industries to address concerns; deciding how to implement new
21 federal and state regulations; and providing policy recommendations to management.

22 **PURPOSE OF TESTIMONY**

23 **Q. What is the purpose of your testimony?**

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1 A. The purpose of my testimony is to present DNR’s position as to the “MidAmerican
2 Energy Company Electric Power Generation Facility Budget Update for January 1,
3 2014 through December 31, 2023” and the “MidAmerican Energy Company Electric
4 Power Generation Facility Emissions Plan for January 1, 2014, through December 31,
5 2023” along with the accompanying pre-filed testimony.

6 **Q. Have you reviewed the 2014 Emissions Plan and Budget and the accompanying**
7 **pre-filed testimony?**

8 A. Yes, I have.

9 **Q. Which parts of the 2014 Emissions Plan and Budget will you be addressing in**
10 **your testimony?**

11 A. I will address the pending federal regulatory requirement for Cooling Water Intake
12 Structures listed in the Plan.

13 **Q. What are your specific comments the Plan section of the 2014 Emissions Plan**
14 **and Budget document?**

15 A. The information provided in the Plan and Budget accurately reflects the current status
16 of federal requirements at the time of submittal. Since this document was created,
17 EPA has issued a pre-publication release of the federal register notice for the Cooling
18 Water Intake Structures Rulemaking under section 316(b) of the Clean Water Act.
19 EPA has not yet published the rules in the federal register and does not know when
20 that will occur. Changes may still be made to the section 316(b) rules prior to
21 publishing.

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1 **Q. Do you have additional comments on the Emissions Plan document?**

2 A. Yes. The Plan does not describe the length of time to complete the impingement and
3 entrainment studies other than that they begin within 6 months after the final rule is
4 promulgated. According to EPA's pre-publication release, facilities will have 45
5 months to provide completed impingement and entrainment studies. The pre-
6 publication release indicates that EPA still expects studies to begin within 6 months
7 of rule promulgation. Also, the pre-publication release no longer includes the eight
8 year deadline for compliance with standards as described in the Plan. No deadline is
9 included in the pre-publication release; however it is noted in the release that EPA
10 expects that it will take approximately eight years to comply. In the current version
11 of the pre-publication release, discretion is given to the permitting authority to
12 determine the length of schedule necessary for compliance with the final rules.

13 **Q. Are there any updates the Department would like to mention that are referenced**
14 **in the 2014 Emissions Plan and Budget document?**

15 A. Yes, the Plan lists the facilities likely to be impacted by the final rule and included all
16 IPL facilities that withdraw more than two million gallons per day from waters of the
17 United States. The pre-publication release still includes only facilities that withdraw
18 more than two million gallons per day, so the list of affected facilities in the Plan is
19 still accurate.

20 **Q. Does this Plan document, when taken together with the Budget document and**
21 **the accompanying pre-filed testimony, meet applicable state environmental**
22 **requirements?**

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1 A. To the best of my knowledge and at this time, the 2014 Plan and Budget, in
2 conjunction with continued compliance with all permitting requirements and permit
3 conditions, meets applicable state environmental requirements for regulated
4 emissions.

5 **Q. Does this conclude your prepared testimony?**

6 A. Yes, it does.