



JOHN DEERE

December 22, 2011

Executive Secretary
Iowa Utilities Board
1375 East Court Avenue, Rm 69
Des Moines, IA 50319-0069

**FILED WITH
Executive Secretary**

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IOWA UTILITIES BOARD

RE: Utility Coal Plant Planning, NOI-2011-0003

Dear Ms. Conrad:

Deere and Company greatly appreciates the Board's proactive interest in energy issues. The various EPA regulations at issue in this inquiry and the Board's November 8, 2011 Order soliciting comments primarily relate to Subpart ZZZZ of Part 63 (National Emission Standards for Hazardous Air Pollutants for Source Categories, or NESHAP) and the boiler MACT standards.

Currently, Deere & Company operates internal combustion engines that will be affected by the RICE regulations. We are evaluating methods of complying with this standard, and do not expect to reduce electrical generating capacity in response to this regulation.

John Deere boilers located at Dubuque, Iowa, and at East Moline, Illinois, may be affected by the industrial boiler MACT standards. These boilers operate both for facility and process steam needs as well as electric generation. Specifically, in response to the request for information regarding operating capacity of our Dubuque plant (Page 4 of the Board's Order dated November 8, 2011), Dubuque has ceased use of coal-fired generation for several reasons including implications of the proposed MACT standards. Dubuque's current nameplate capacity installed is approximately 9 MW of diesel-powered generation, and Deere has correspondingly modified its firm kW under IPL Rider INTSERV effective May 1, 2011. Energy (MWh) produced at John Deere Dubuque Works will likely be limited to interruptible or other limited use of the diesel generators. Deere made limited comments to U.S. EPA regarding industrial boiler MACT on July 14, 2011. Substantively, Deere's comments proposed a staged implementation of industrial boilers to avoid direct competition with utilities on the same timeline for similar pollution control equipment. Deere continues to monitor the status of the changed regulation issued by U.S. EPA on December 2, 2011.



Deere, respectfully, cannot be more specific about other impacts or plans for these facilities at this time.

Very truly yours,

/s/ Kathleen Gibson
Kathleen Gibson, Senior Counsel
Deere and Company
1 John Deere Place
Moline, IL 61265

/s/ Jeff Kaman
Jeff Kaman, Energy Manager
Deere and Company
1 John Deere Place
Moline, IL 61265