



Alliant Energy Corporate Services
Legal Department
319-786-4505 – Phone
319-786-4533 – Fax

Kent M. Ragsdale
Managing Attorney - Regulatory

**FILED WITH
Executive Secretary**

December 05, 2011

IOWA UTILITIES BOARD

Interstate Power and Light Co.
An Alliant Energy Company

Alliant Tower
200 First Street SE
P.O. Box 351
Cedar Rapids, IA 52406-0351

Office: 1.800.822.4348
www.alliantenergy.com

December 5, 2011

Ms. Joan Conrad, Executive Secretary
Iowa Utilities Board
1375 East Court Avenue, Room 69
Des Moines, IA 50319-0069

RE: Interstate Power and Light Company
High-Voltage Transmission Projects
Docket No. NOI-2011-0002
Reply Comments

Dear Secretary Conrad:

Enclosed please find Interstate Power and Light Company's Reply Comments in the above-referenced docket, as filed today on EFS.

Very truly yours,

/s/ Kent M. Ragsdale

Kent M. Ragsdale
Managing Attorney - Regulatory

KMR/kjf
Enclosure

STATE OF IOWA
BEFORE THE IOWA UTILITIES BOARD

IN RE: HIGH-VOLTAGE TRANSMISSION PROJECTS	DOCKET NO. NOI-2011-0002
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REPLY COMMENTS

COMES NOW, Interstate Power and Light Company (IPL), pursuant to the Iowa Utilities Board (Board) Order Soliciting Reply Comments (Order) issued on November 4, 2011, IPL states as follows:

The Board's November 4, 2011, Order in this docket stated the event participants want to file reply comments, those comments could be provided.

IPL Reply Comments

IPL has reviewed the comments filed on November 3, 2011, by other parties in this docket. In light of recent filings at the Federal Energy Regulatory Agency (FERC), IPL wishes to provide additional information in this docket to keep the Board abreast of IPL's change of position on one of the high voltage transmission projects in this docket.

The Rock Island Clean Line project had provided information to the Board on October 3, 2011 and this information was reviewed by IPL. IPL provided Comments, filed on November 3, 2011, in this docket that it did not have enough information regarding the Rock Island Clean Line project to take a position.

On November 8, 2011, Rock Island Clean Line LLC (Rock Island) filed, pursuant to Section 205 of the Federal Power Act (FPA), 16 U.S.C. § 824d, and

Part 35 of the regulations of the FERC under the FPA, 18 C.F.R. Part 35 (2011), an authorization request to sell transmission services at negotiated rates (November 8 Filing) in FERC Docket No. ER12-365-000. This request relates to a proposed approximately 500 mile long, +/- 600 kilovolt (“kV”), high voltage, direct current (“HVDC”) transmission line capable of delivering 3,500 megawatts (“MW”) of power. In its November 8 Filing, Rock Island made several unsupported claims in regards to the Project.

On November 29, 2011, IPL filed a Motion to Intervene and Comments in FERC Docket No. ER12-365-000. IPL is opposed to the project that Rock Island has put forth due to the limited information that has been provided and an apparent lack of due diligence into the project’s potential affects. This current void of information prevents IPL from arriving at an informed decision or supportive stance with the Project. IPL’s Motion in FERC Docket No. ER12-365-000 is provided as Attachment A.

WHEREFORE, Interstate Power and Light Company respectfully requests that the Iowa Utilities Board give due consideration to IPL’s reply comments found in the Board’s November 4, 2011, Order.

Dated this 5th day of December, 2011.

Respectfully Submitted,
Interstate Power and Light Company

By: /s/ Kent M. Ragsdale
Kent M. Ragsdale
Managing Attorney – Regulatory
Alliant Energy Corporate Services, Inc.
200 First Street SE, P.O. Box 351
Cedar Rapids, IA 52406-0351
(319) 786-7765
kentragdale@alliantenergy.com

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Rock Island Clean Line LLC)	Docket No. ER12-365-000
)	

**MOTION TO INTERVENE AND COMMENTS OF
INTERSTATE POWER AND LIGHT COMPANY**

Pursuant to Rules 211, 212 and 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“FERC” or “Commission”), 18 C.F.R. §§ 385.211, 385.212 and 385.214, Interstate Power and Light Company (“IPL”) respectfully files this motion to intervene and provide comments in the above-captioned docket.

I. COMMUNICATIONS

IPL requests that all communications regarding this motion to intervene and comments be addressed to the following persons:

Cortlandt C. Choate, Jr. Senior Attorney Alliant Energy Corporate Services, Inc. Street: 4902 North Biltmore Lane Madison, WI 53718 Telephone: 608-458-6217 Facsimile: 608-786-4553 E-Mail: CortlandtChoate@alliantenergy.com	Mitchell A. Myhre Manager of Regulatory Affairs Alliant Energy Corporate Services, Inc. Street: 4902 North Biltmore Lane Madison, WI 53718 Telephone: 608-458-6273 Facsimile: 608-458-0133 E-Mail: MitchellMyhre@alliantenergy.com
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IPL also requests that Messrs. Choate and Myhre be placed on the Commission’s official service list for this docket.

II. MOTION TO INTERVENE

On November 8, 2011, Rock Island Clean Line LLC (“Rock Island”) filed, pursuant to Section 205 of the Federal Power Act (“FPA”), 16 U.S.C. § 824d, and Part 35 of the regulations

Docket No. ER12-365-000

of the FERC under the FPA, 18 C.F.R. Part 35 (2011), an authorization request to sell transmission services at negotiated rates (“November 8 Filing”). This request relates to a proposed approximately 500 mile long, +600 kilovolt (“kV”), high voltage, direct current (“HVDC”) transmission line (the “Project”) capable of delivering 3,500 megawatts (“MW”) of power. The Project will cross IPL service territory and extend from a point to be located in northwestern Iowa to an interconnection in Illinois with the extra high voltage (“EHV”) transmission system within PJM Interconnection, L.L.C. (“PJM”).

IPL is a load-serving entity (“LSE”) that owns and operates electric facilities engaged in the generation, purchase, distribution, and sale of electric power and energy to approximately 525,000 electric customers in Iowa and southern Minnesota. IPL is a transmission-dependent utility and thus does not own or operate transmission facilities. IPL is also a Midwest Independent System Operator, Inc. (“MISO”) market participant and incurs costs associated with the purchase of transmission, capacity, energy, and ancillary market services within the MISO market.

IPL has a direct and substantial interest in this docket, and requests participation because IPL will be directly affected by the outcome. IPL’s participation is in the public interest due to IPL’s unique obligation as a public utility providing the sole source of electric service in its service territory. No other party can adequately represent IPL’s interests before the Commission.

III. COMMENTS

IPL is opposed to the Project that Rock Island has put forth due to the limited information that has been provided and an apparent lack of due diligence into the Project’s potential affects. This current void of information prevents IPL from arriving at any sort of informed decision or supportive stance with the Project. As a transmission-dependent utility, IPL guards against

Docket No. ER12-365-000

unnecessary transmission costs being placed on its customers by advocating for only prudent transmission to be built in its service territory. IPL is committed to supporting its customers' desires for needed transmission to be built; however any transmission project selected for completion must meet a minimum standard of evaluation and transparency. The Project has not yet met this minimum standard.

IPL views the Project as having potential risks to customers in its service territory and thus believes the Project warrants further investigation. In its November 8 Filing, Rock Island makes several unsupported claims in regards to the Project. These claims include that the Project will:

- Not have any parallel flow effects on the existing regional transmission grid¹;
- Relieve current transmission constraints in the region²;
- Provide congestion relief and elimination of current transmission constraints on energy transfers between the MISO grid and PJM grid³;
- Improve reliability and reduce congestion on alternating current (“AC”) lines⁴;
- Lower the overall cost energy production dispatched on the AC grid⁵;
- Reduce the need for a transmission operator to depart from least cost economic dispatch⁶;
- Provide added stability and reliability to the PJM system⁷; and

¹ November 8 Filing, p. 2.

² November 8 Filing, p. 8.

³ November 8 Filing, p. 8.

⁴ November 8 Filing, p. 9.

⁵ November 8 Filing, P. 9.

⁶ November 8 Filing, P. 9.

Docket No. ER12-365-000

- Deliver substantial reduction in wholesale energy prices, both on the delivery end and windward end of the Project⁸.

IPL believes the above mentioned claims need to be substantiated with the appropriate analysis and modeling evidence. This analysis should also examine the potential affects the Project could have on surrounding systems. For example, if the Project should come off line, what would be the impact? An abrupt change in the large amount of energy the Project is proposing to carry would undoubtedly have impacts on the surrounding systems. Also, the Project is specifically targeting wind resources, an intermittent energy source. The variable nature of the electricity the Project will deliver and its impacts on the surrounding system should also be studied. A complete analysis of all of these issues is needed to ensure the reliability of the systems the Project will impact.

The necessary analysis and modeling that needs to be completed should be done with the Regional Transmission Organizations (“RTOs”) the Project will cross. Rock Island has stated that they will turn operation of the Project over to one of the two RTOs to which it will be interconnected, MISO and PJM.⁹ This demonstrates the importance of working with the RTOs before the Project is constructed. Rock Island has submitted requests with PJM to interconnect the Project with the PJM network in Illinois and also submitted a request for MISO to complete the studies required to interconnect in the MISO region as well.¹⁰ However, no further information is given as to the status or results of these requests and there is no indication of any

⁷ November 8 Filing, p. 9.

⁸ November 8 Filing, p. 9.

⁹ November 8 Filing, p. 1.

Docket No. ER12-365-000

further planning effort being made with the two RTOs. Once these proper planning procedures have been performed the results should be made available to stakeholders in order for stakeholders to understand the affects and consequences of the Project. It is at that time that IPL will be able to make a final informed evaluation of the Project.

In regards to the Project's cost allocation Rock Island has stated that:¹¹

- Only customers who have agreed contractually to purchase transmission capacity on the Project will have the obligation to pay for the service;
- The Project will have no captive customers to whom costs of the Project could be passed onto;
- Project costs will not be allocated either on a load-ratio-share or cost-causation basis to the class of load-serving entities taking service the Open Access Transmission Tariff ("OATT") in the RTO; and
- It will assume the full market risk of the Project.

IPL supports this cost allocation approach and believes that this is the only cost allocation approach that can be taken with such a project. Additionally, IPL requests that the Commission specifically order that costs associated with the Project be only allocated to subscribers in order to protect customers in the Project area from any cost responsibility or potential problems that may occur.

¹⁰ November 8 Filing, p. 12.

¹¹ November 8 Filing, p. 30-31

Docket No. ER12-365-000

WHEREFORE, for the reasons discussed above, IPL respectfully requests that the Commission grant its motion to intervene in this proceeding and consider its comments herein.

Respectfully submitted,

Interstate Power and Light Company

/s/ Cortlandt C. Choate, Jr.

Cortlandt C. Choate, Jr.
Senior Attorney
Alliant Energy Corporate Services, Inc.

November 29, 2011

CERTIFICATE OF SERVICE

In accordance with 18 C.F.R. § 385.2010, I hereby certify that I have on this 29th day of November, 2011, caused a copy of the foregoing Motion to Intervene and Comments of Interstate Power and Light Company to be sent to each person designated on the official service list compiled by the Secretary of the Commission in Docket Number ER12-365-000.

/s/ Cortlandt C. Choate, Jr.

Cortlandt C. Choate, Jr.
Senior Attorney
Alliant Energy Corporate Services, Inc.