

November 9, 2023

Erik Helland, Chair  
Iowa Utilities Board  
1375 E. Court Ave.  
Des Moines, IA 50319-0069

Dear Board Members:

The recent charrettes held by the Iowa Utilities Board and facilitated by London Economics International, LLC, have made it clear that there is broad stakeholder consensus on the need for electric utilities to begin undertaking regular and transparent integrated resource planning to ensure reliable and reasonably priced electricity for Iowa customers. The undersigned organizations encourage the adoption of integrated resource planning as a necessary step to advance the objectives identified in House File 617.

The undersigned organizations agree that, in order to ensure delivery of reliable, reasonably priced and clean electricity, utilities should be required to undertake integrated resource planning that includes the following core elements:

- Occur on regular, predictable intervals, such as every three years;
- Include both a short-term (five year) and long-term planning horizon, such as fifteen to twenty years, to account for both short- and long-term risks;
- Include quantitative comparative analysis of potential resource mixes (both existing and new) to serve anticipated customer needs using industry best practices, including capacity expansion and production cost modeling;
- Assess customer costs and seasonal reliability of alternative resource mix options, including quantitative comparative analysis of both;
- The quantitative analysis should include energy efficiency, demand response, and distributed generation as options to meet energy and capacity needs;
- Align resource planning with transmission and a new, stakeholder-inclusive distribution system planning process;
- Include a robust stakeholder engagement process, including stakeholder rights to conduct discovery and to file comments on the utility's proposed plan, as well as an opportunity for members of the public to comment on key elements of the plan; and
- Establish minimum criteria for demonstrating the IRP's reasonableness, such as adequate consideration of cost, risk, reliability, and environmental impact, and include the Board's ability to approve, disapprove, or require modification of the submitted IRPs. To ensure flexibility, it should be clear that the Board can consider changed circumstances in evaluating planning assumptions and resource proposals that were not modeled or identified in the IRP.

As the undersigned have noted throughout the charrette process, the vast majority of states across the country with vertically-integrated monopoly electric utilities have adopted integrated resource planning requirements as a key tool for ensuring utilities are planning for reliable and affordable long-term electric service during a time of rapid change in electricity economics, and to account for potential costs and risks under a range of possible future scenarios. The IRP

process should be designed to ensure the reasonableness of utility investments for which Iowa businesses and families pay through their rates.

We recognize that the utilities participating in the charrette process have not universally supported adoption of IRPs as a requirement. However, the willingness of those same utilities to agree to these types of analyses in settlements in which the monopoly utility retains control over the process demonstrates their ability to conduct this analysis and the need for proper regulatory oversight. Establishing a legal framework for integrated resource planning and defining minimum resource planning requirements will help ensure that utility resource decisions are guided by reasonable cost planning information.

We look forward to working with the Board and legislature to achieve the objectives identified in House File 617.

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