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Michael S. Greiveldinger
Managing Attorney

February 1, 2018

Mr. Daniel P. Wolf,
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101-2147

RE: Interstate Power and Light Company
Docket No. E001/RP-17-374
2017 Electric Integrated Resource Plan

Dear Mr. Wolf:

Interstate Power and Light Company ("IPL") hereby submits to the Minnesota Public Utilities Commission ("Commission" or "MPUC") IPL's 2017 Electric Integrated Resource Plan ("IRP"). IPL's 2017 IRP is being filed pursuant to Minn. Stat. § 216B.2422 and Chapter 7843 of the Commission's rules.¹

On July 31, 2015, IPL sold its electric retail service territory to Southern Minnesota Energy Cooperative (SMEC) and no longer provides retail electric service to any Minnesota customers. Consequently, IPL is no longer a "public utility" as defined by Minn. Stat. § 216B.02, Subd. 4, but remains a "utility" as that term is defined at Minn. Stat. § 216B.2422 Subd. 1(b). Under Minn. Stat. § 216B.2422 Subd. 2(b), the Commission's order on IPL's 2017 IRP is advisory in nature. Additionally, "the commission shall consider the filing requirements and decisions in any comparable proceedings in another jurisdiction."

IPL has made significant investments in its generating fleet, which position IPL well to continue to provide reliable and cost-effective service. Of particular note, IPL placed into service on April 1, 2017, the nominal 630 MW Marshalltown Generating Station, a highly-efficient, natural-gas combined cycle generating station located in Marshalltown, Iowa.

IPL is also expanding its renewable portfolio with owned and contract wind generation additions. IPL acquired the Franklin County Wind Farm, a 99 MW wind farm located in Franklin County, on April 1, 2017, and entered into a power purchase agreement (PPA)

¹ In its August 7, 2015 Order approving IPL's 2014-2029 IRP in Docket No. E-001/RP-14-77, the Commission specified a July 1, 2017 filing date for IPL's subsequent IRP. The Commission approved an extension of that filing date until February 1, 2018.

Mr. Wolf
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in 2016 for the 200 MW Turtle Creek Wind Farm, located in Mitchell County, Iowa, which has an expected 2018 in-service date. Moreover, IPL has received advanced ratemaking principles from the Iowa Utilities Board to construct up to 500 MW of new wind generation in Iowa, and is seeking advanced ratemaking principles for an additional 500 MW of new wind.

IPL's investments and resource plan place it in a strong position to serve load reliably, safely, responsibly, and in a cost-effective manner, while maintaining the ability to adjust its resource plans for evolving conditions and requirements.

Copies of the Resource Plan have been served on the Minnesota Department of Commerce, Division of Energy Resources, and the Minnesota Office of Attorney General – Antitrust and Utilities Division. Additionally, as reflected on the attached Affidavit of Service, the IPL 2017 IRP Non-Technical Summary has been served on IPL's official general service list and the 2014 IRP service list (see Docket No. E001/RP-14-77).

Respectfully submitted,

/s/ Michael S. Greiveldinger
Michael S. Greiveldinger
Managing Attorney

MSG/tab
Enclosures

cc: Service List

STATE OF MINNESOTA

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

**Nancy Lange
Dan Lipschultz
Matt Schuerger
Katie Sieben
John A. Tuma**

**Chair
Commissioner
Commissioner
Commissioner
Commissioner**

**IN THE MATTER OF INTERSTATE
POWER AND LIGHT COMPANY'S 2017
INTEGRATED RESOURCE PLAN**

DOCKET NO. E001/RP-17-374

AFFIDAVIT OF SERVICE

STATE OF IOWA)
) ss.
COUNTY OF LINN)

Tonya A. Bender, being first duly sworn on oath, deposes and states:

That on the 1st day of February, 2018, copies of the foregoing Affidavit of Service, together with Interstate Power and Light Company's 2017 Electric Integrated Resource Plan Request for Extension of Time, were served upon the parties on the attached service list, by e-filing, overnight delivery, electronic mail, and/or first-class mail, proper postage prepaid from Cedar Rapids, Iowa.

 /s/ Tonya A. Bender
Tonya A. Bender

Subscribed and Sworn to Before Me
This 1st day of February, 2018.

 /s/ Beverly A. Petska
Beverly A. Petska
Notary Public
My Commission expires November 12, 2020

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|-------------|-----------|--------------------------------------|---|--|--------------------|-------------------|---|
| Christopher | Anderson | canderson@allete.com | Minnesota Power | 30 W Superior St Duluth, MN 558022191 | Electronic Service | No | GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List |
| Julia | Anderson | Julia.Anderson@ag.state.mn.us | Office of the Attorney General-DOC | 1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134 | Electronic Service | No | GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List |
| William A. | Blazar | bblazar@mnchamber.com | Minnesota Chamber Of Commerce | Suite 1500 400 Robert Street North St. Paul, MN 55101 | Electronic Service | No | GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List |
| City | Clerk | sschulte@ci.albertlea.mn.us | City of Albert Lea | 221 E Clark St Albert Lea, MN 56007 | Electronic Service | No | GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List |
| Daniel R | Culhane | DanielCulhane@alliantenergy.com | Alliant Energy Corporate Services, Inc. | 4902 North Biltmore Ln Madison, WI 53718-2148 | Electronic Service | No | GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List |
| Ian | Dobson | ian.dobson@ag.state.mn.us | Office of the Attorney General-RUD | Antitrust and Utilities Division 445 Minnesota Street, BRM Tower St. Paul, MN 55101 | Electronic Service | No | GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List |
| Ian | Dobson | Residential.Utilities@ag.state.mn.us | Office of the Attorney General-RUD | 1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130 | Electronic Service | No | GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List |
| Sharon | Ferguson | sharon.ferguson@state.mn.us | Department of Commerce | 85 7th Place E Ste 280 Saint Paul, MN 551012198 | Electronic Service | No | GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List |
| David | Grover | dgrover@itctransco.com | ITC Midwest | 901 Marquette Avenue Suite 1950 Minneapolis, MN 55402 | Electronic Service | No | GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List |
| Annete | Henkel | mui@mnuilityinvestors.org | Minnesota Utility Investors | 413 Wacouta Street #230 St.Paul, MN 55101 | Electronic Service | No | GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List |
| | | | | | | | |

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|------------|-----------|----------------------------------|-------------------------------------|---|--------------------|-------------------|---|
| Linda | Jensen | linda.s.jensen@ag.state.mn.us | Office of the Attorney General-DOC | 1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134 | Electronic Service | No | GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List |
| Jim | Krueger | jkruieger@fmcs.coop | Freeborn-Mower Cooperative Services | Box 611 Albert Lea, MN 56007 | Electronic Service | No | GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List |
| Kavita | Maini | kmains@wi.rr.com | KM Energy Consulting LLC | 961 N Lost Woods Rd Oconomowoc, WI 53066 | Electronic Service | No | GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List |
| Pam | Marshall | pam@energycents.org | Energy CENTS Coalition | 823 7th St E St. Paul, MN 55106 | Electronic Service | No | GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List |
| David | Moeller | dmoeller@allete.com | Minnesota Power | 30 W Superior St Duluth, MN 558022093 | Electronic Service | No | GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List |
| Carl | Nelson | cnelson@mncee.org | Center for Energy and Environment | 212 3rd Ave N Ste 560 Minneapolis, MN 55401 | Electronic Service | No | GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List |
| Samantha | Norris | samanthanorris@alliantenergy.com | Interstate Power and Light Company | 200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351 | Electronic Service | No | GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List |
| Steven | Nyhus | swnyhus@flahertyhood.com | Flaherty & Hood PA | 525 Park St Ste 470 Saint Paul, MN 55103 | Electronic Service | No | GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List |
| Richard | Savelkoul | rsavelkoul@martinsquires.com | Martin & Squires, P.A. | 332 Minnesota Street Ste W2750 St. Paul, MN 55101 | Electronic Service | No | GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List |

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|------------|---------------|-------------------------------|------------------------------------|---|--------------------|-------------------|---|
| Larry L. | Schedin | Larry@LLSResources.com | LLS Resources, LLC | 332 Minnesota St, Ste W1390 St. Paul, MN 55101 | Electronic Service | No | GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List |
| Ron | Spangler, Jr. | rlspangler@otpc.com | Otter Tail Power Company | 215 So. Cascade St. PO Box 496 Fergus Falls, MN 565380496 | Electronic Service | No | GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List |
| Robyn | Woeste | robynwoeste@alliantenergy.com | Interstate Power and Light Company | 200 First St SE Cedar Rapids, IA 52401 | Electronic Service | No | GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List |
| Daniel P | Wolf | dan.wolf@state.mn.us | Public Utilities Commission | 121 7th Place East Suite 350 St. Paul, MN 551012147 | Electronic Service | No | GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List |

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| Christopher | Anderson | canderson@allete.com | Minnesota Power | 30 W Superior St Duluth, MN 558022191 | Electronic Service | No | OFF_SL_14-77_RP-14-77 |
| William A. | Blazar | bblazar@mnchamber.com | Minnesota Chamber Of Commerce | Suite 1500 400 Robert Street North St. Paul, MN 55101 | Electronic Service | No | OFF_SL_14-77_RP-14-77 |
| City | Clerk | sschulte@ci.albertlea.mn.us | City of Albert Lea | 221 E Clark St Albert Lea, MN 56007 | Electronic Service | No | OFF_SL_14-77_RP-14-77 |
| Generic Notice | Commerce Attorneys | commerce.attorneys@ag.state.mn.us | Office of the Attorney General-DOC | 445 Minnesota Street Suite 1800 St. Paul, MN 55101 | Electronic Service | Yes | OFF_SL_14-77_RP-14-77 |
| Leigh | Currie | lcurrie@mncenter.org | Minnesota Center for Environmental Advocacy | 26 E. Exchange St., Suite 206 St. Paul, Minnesota 55101 | Electronic Service | No | OFF_SL_14-77_RP-14-77 |
| Ian | Dobson | residential.utilities@ag.state.mn.us | Office of the Attorney General-RUD | 1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130 | Electronic Service | Yes | OFF_SL_14-77_RP-14-77 |
| Sharon | Ferguson | sharon.ferguson@state.mn.us | Department of Commerce | 85 7th Place E Ste 280 Saint Paul, MN 551012198 | Electronic Service | No | OFF_SL_14-77_RP-14-77 |
| David | Grover | dgrover@itctransco.com | ITC Midwest | 901 Marquette Avenue Suite 1950 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_14-77_RP-14-77 |
| Annete | Henkel | mui@mnuutilityinvestors.org | Minnesota Utility Investors | 413 Wacouta Street #230 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_14-77_RP-14-77 |
| John | Hole | jhole@misoenergy.org | MISO | 2985 Ames Crossing Rd Eagan, MN 55121 | Electronic Service | No | OFF_SL_14-77_RP-14-77 |
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| Linda | Jensen | linda.s.jensen@ag.state.mn.us | Office of the Attorney General-DOC | 1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134 | Electronic Service | Yes | OFF_SL_14-77_RP-14-77 |
| Richard | Johnson | Rick.Johnson@lawmoss.com | Moss & Barnett | 150 S. 5th Street Suite 1200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_14-77_RP-14-77 |
| Jim | Krueger | jkrueger@fmcs.coop | Freeborn-Mower Cooperative Services | Box 611 Albert Lea, MN 56007 | Electronic Service | No | OFF_SL_14-77_RP-14-77 |
| Kavita | Maini | kmains@wi.rr.com | KM Energy Consulting LLC | 961 N Lost Woods Rd Oconomowoc, WI 53066 | Electronic Service | No | OFF_SL_14-77_RP-14-77 |
| Pam | Marshall | pam@energycents.org | Energy CENTS Coalition | 823 7th St E St. Paul, MN 55106 | Electronic Service | No | OFF_SL_14-77_RP-14-77 |
| David | Moeller | dmoeller@allete.com | Minnesota Power | 30 W Superior St Duluth, MN 558022093 | Electronic Service | No | OFF_SL_14-77_RP-14-77 |
| Carl | Nelson | cnelson@mncee.org | Center for Energy and Environment | 212 3rd Ave N Ste 560 Minneapolis, MN 55401 | Electronic Service | No | OFF_SL_14-77_RP-14-77 |
| Samantha | Norris | samanthanorris@alliantenergy.com | Interstate Power and Light Company | 200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351 | Electronic Service | No | OFF_SL_14-77_RP-14-77 |
| Richard | Savelkoul | rsavelkoul@martinsquires.com | Martin & Squires, P.A. | 332 Minnesota Street Ste W2750 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_14-77_RP-14-77 |

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| Larry L. | Schedin | Larry@LLSResources.com | LLS Resources, LLC | 332 Minnesota St, Ste W1390 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_14-77_RP-14-77 |
| Elizabeth | Wefel | eawefel@flaherty-hood.com | Missouri River Energy Services | 3724 W Avera Drive PO Box 88920 Sioux Falls, SD 57109-8920 | Electronic Service | No | OFF_SL_14-77_RP-14-77 |
| Robyn | Woeste | robynwoeste@alliantenergy.com | Interstate Power and Light Company | 200 First St SE Cedar Rapids, IA 52401 | Electronic Service | Yes | OFF_SL_14-77_RP-14-77 |
| Daniel P | Wolf | dan.wolf@state.mn.us | Public Utilities Commission | 121 7th Place East Suite 350 St. Paul, MN 551012147 | Electronic Service | Yes | OFF_SL_14-77_RP-14-77 |

STATE OF MINNESOTA

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

**Nancy Lange
Dan Lipschultz
Matt Schuerger
Katie Sieben
John A. Tuma**

**Chair
Commissioner
Commissioner
Commissioner
Commissioner**

**IN THE MATTER OF INTERSTATE
POWER AND LIGHT COMPANY'S 2017
INTEGRATED RESOURCE PLAN**

DOCKET NO. E001/RP-17-374

STATEMENT PROVIDING JUSTIFICATION FOR TRADE SECRET INFORMATION

Pursuant to the Minnesota Public Utilities Commission's (Commission) revised procedures for Handling Trade Secret and Privileged Data and Minn. Stat. §13.37 and Minn. Rule Pt. 7829.0500, Interstate Power and Light Company (IPL) has marked specific information contained within its 2017 Electric Integrated Resource Plan (Resource Plan) as Trade Secret.

IPL is providing a non-public version of its Resource Plan that contains trade secret information, as defined by section 13.37, subd. 1(b) of the Minnesota Statutes, in that the information is the subject of efforts by IPL that are reasonable under the circumstances to maintain its secrecy, and that derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use. IPL has marked the information pursuant to the Minnesota Public Utilities Commission's Revised Procedures for Handling Trade Secret and Privileged Data, Minn. Rule Pt. 7829.0500.

A small number of people currently have knowledge of this information, which is not available from public sources, and IPL makes consistent efforts to maintain the confidentiality of the information. The information has substantial value to IPL, and would be of substantial value to IPL's competitors for various purposes. Should the information fall into the hands of IPL's competitors, it could be used to create a competitive disadvantage for IPL, resulting in higher costs to IPL's customers.

Accordingly, IPL believes the above identified information contained in IPL's Resource Plan meets the definition of trade secret under Minn. Stat. §13.37.