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Michael S. Greiveldinger
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Interstate Power and Light Company
An Alliant Energy Company

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September 22, 2014

Dr. Burl W. Haar
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-14-77
Informational Filing

Dear Dr. Haar:

Enclosed for eFiling with the Minnesota Public Utilities Commission (Commission) please find a copy of the following documents:

- Interstate Power and Light Company's (IPL) *Second Semi-Annual Status Report Marshalltown Generating Station* filed with the Iowa Utilities Board (Board) on August 29, 2014 (see Attachment A); and
- *Certificate of Public convenience, Use and Necessity* issued by the Board on May 8, 2014 (see Attachment B).

Please note that this is not a Notice of Changed Circumstances filing. IPL has not made any official changes to its Integrated Resource Plan (IRP) action plan at this time. IPL provides this information to keep parties informed about the construction, transmission, permitting, and other activities related to the approximate 650 megawatt natural gas-fired Marshalltown Generating Station (MGS) located in Marshalltown, Iowa. Based upon the information currently available to IPL, IPL continues to anticipate that MGS will be on-line in the second quarter of 2017.

IPL seeks no action by the Commission, but felt it appropriate to provide this information as part of the IRP docket.

Dr. Haar
September 22, 2014
Page 2 of 2

Copies of this filing have been served on the Minnesota Department of Commerce, Division of Energy Resources, the Minnesota Office of Attorney General-Residential and Small Business Utilities Division, and the attached service list.

Respectfully submitted,

/s/ Michael S. Greiveldinger
Michael S. Greiveldinger
Senior Attorney

MSG/kcb
Enclosures

cc: Service List

STATE OF MINNESOTA

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger
David C. Boyd
Nancy Lange
Dan Lipschultz
Betsy Wergin

Chair
Commissioner
Commissioner
Commissioner
Commissioner

IN THE MATTER OF INTERSTATE
POWER AND LIGHT COMPANY'S 2014
INTEGRATED RESOURCE PLAN

DOCKET NO. E001/RP-14-77

AFFIDAVIT OF SERVICE

STATE OF IOWA)
) ss.
COUNTY OF LINN)

Kathleen C. Balvanz, being first duly sworn on oath, deposes and states:

That on the 22nd day of September, 2014, copies of the foregoing Affidavit of Service, together with Interstate Power and Light Company's, Informational Filing, 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/ Kathleen C. Balvanz
Kathleen C. Balvanz

Subscribed and Sworn to Before Me
this 22nd day of September, 2014.

/s/ Kathleen J. Faine
Kathleen J. Faine
Notary Public
My Commission Expired on February 20, 2015

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Bobby	Adam	bobby.adam@conagrafoods.com	ConAgra	Suite 5022 11 ConAgra Drive Omaha, NE 68102	Electronic Service	No	OFF_SL_14-77_RP-14-77
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	Yes	OFF_SL_14-77_RP-14-77
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_14-77_RP-14-77
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Michael	Bradley	mike.bradley@lawmoss.com	Moss & Barnett	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-77_RP-14-77
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Ian	Dobson	ian.dobson@ag.state.mn.us	Office of the Attorney General-RUD	Antitrust and Utilities Division 445 Minnesota Street, 1400 BRM Tower St. Paul, MN 55101	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 500 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_14-77_RP-14-77
Elizabeth	Goodpaster	bgoodpaster@mncenter.org	MN Center for Environmental Advocacy	Suite 206 26 East Exchange Street St. Paul, MN 551011667	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

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Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_14-77_RP-14-77
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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
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Matthew J.	Schuerger P.E.	mjsreg@earthlink.net	Energy Systems Consulting Services, LLC	PO Box 16129 St. Paul, MN 55116	Electronic Service	No	OFF_SL_14-77_RP-14-77
Ron	Spangler, Jr.	rlspangler@otpc.com	Otter Tail Power Company	215 So. Cascade St. PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_14-77_RP-14-77
Marya	White	mwhite@misoenergy.org	MISO	1125 Energy Park Dr St. Paul, MN 55108	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



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August 29, 2014

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

FILED WITH
Executive Secretary
August 29, 2014
IOWA UTILITIES BOARD

RE: Interstate Power and Light Company
Docket Nos. RPU-2012-0003 and GCU-2012-0001
Second Semi-Annual Status Report Marshalltown Generating Station

Dear Secretary Conrad:

Enclosed please find Interstate Power and Light Company's Second Semi-Annual Status Report Marshalltown Generating Station, as filed today on EFS in the above-referenced dockets.

Very truly yours,

/s/ Michael S. Greiveldinger

Michael S. Greiveldinger
Senior Attorney

MSG/kjf
Enclosures

FILED WITH
Executive Secretary

August 29, 2014

IOWA UTILITIES BOARD

STATE OF IOWA

BEFORE THE IOWA UTILITIES BOARD

<p>IN RE:</p> <p>INTERSTATE POWER AND LIGHT COMPANY</p>	<p>DOCKET NOS. GCU-2012-0001 RPU-2012-0003</p>
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**SECOND SEMI-ANNUAL STATUS REPORT
MARSHALLTOWN GENERATING STATION**

COMES NOW, Interstate Power and Light Company (IPL), and submits to the Iowa Utilities Board (Board) its Second Semi-Annual Status Report regarding construction, transmission, permitting, and other activities related to the Marshalltown Generating Station (MGS).

MGS PROJECT STATUS

1. On November 8, 2013, the Board issued its Proposed Decision and Order (November 8th Order), of which Order Clause No. 6 requires IPL to, among other things:

...file a status report on MGS on or before March 3, 2014, and every six months thereafter, with the final report due three months after all aspects of the project subject to the overall cost cap are completed. At a minimum, the report shall provide updates on the information identified in the body of this order.

The Board also addressed this requirement at page 29 of its November 8th Order:

IPL will be required to file semi-annual reports with construction progress, both for MGS and any necessary transmission upgrades. The reports are to include detailed information regarding completed transmission work, including interconnection details and Marshalltown area network modifications related to the project.

2. Attachment A to this pleading is IPL's Second Semi-Annual Status Report, which provides the requested information. Attachment A is hereby incorporated by reference.

WHEREFORE, Interstate Power and Light Company respectfully requests that the Iowa Utilities Board accept this documentation as the Second Semi-Annual Status Report.

Dated this 29th day of August, 2014.

Respectfully Submitted,

INTERSTATE POWER AND LIGHT COMPANY

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Attachment A

Second Semi-Annual Status Report

I. Regulatory Status – Marshalltown Generating Station (MGS)

On November 8, 2013, the Iowa Utilities Board (Board) issued the Proposed Order for the construction of MGS (November 8th Order). The November 8th Order was accepted by IPL's Board of Directors on November 19, 2013.

On November 12, 2013, the Large Energy Group (LEG) filed a request for clarification of the record, regarding the November 8th Order. The two clarifications that LEG requested were: 1) the Order should clarify that the cost cap should include reimbursements that IPL may be required to pay ITC Midwest, and that any tax gross-up should be included in the cost cap; and 2) the order should clarify that if IPL is reimbursed for transmission upgrade project costs, that the cost cap should be reduced by said amount. On December 2, 2013, the Iowa Consumers Coalition (ICC) filed a letter supporting LEG's request.

On December 9, 2013, the Board issued the Order Clarification Decision, stating that the amount of the tax gross-up does not increase the cost cap, and that all transmission network upgrade costs count against the cost cap, and that the cost cap therefore would not be decreased. Since no party has sought either administrative or judicial review of the November 8th Order, the Order has been deemed final and un-appealable.

Ordering Clause 1 of the Board's November 8, 2013, Order provides:

Pursuant to Iowa Code chapter 476A (2013), Interstate Power and Light Company's application to construct and operate a generating facility is granted, subject to final pre-construction permits being issued. A certificate will be issued once IPL notifies the Board that final pre-construction permits have been issued.

On April 17, 2014, IPL submitted to the Board the remaining pre-construction permits that could be obtained prior to commencement of construction. IPL concurrently requested that the Board issue an unconditional Generating Certificate in accordance with Ordering Clause 1.

On May 8, 2014, the Board issued a Certificate of Public Convenience, Use, and Necessity (Permit No. GCU-2012-001) ("Certificate"), and granting IPL the authority "to build, construct, maintain, and operate and to operate and maintain other apparatus and appurtenances necessary for generating electricity at its facility located at Marshalltown, Iowa."

Consistent with Iowa Code § 476.53(3)"f," IPL is "[p]roceeding with the construction ... of the facility."

II. Permitting Status - MGS

Since the last Semi-Annual Report filing and as discussed above in Section I, IPL has obtained the remaining, required pre-construction permits and approvals. On April 24, 2014, IPL received the MGS New Source Review-Prevention of Significant Deterioration (PSD) Air Permits (Siting Application, at 2-1) from the Iowa Department of Natural Resources (IDNR). The New Source Review – PSD Air Permits were considered the "critical path" pre-construction permits for MGS.

IPL also received: IDNR National Pollutant Discharge Elimination System (NPDES) Stormwater Construction Permit; City of Marshalltown Stormwater Permit for Construction; City of Marshalltown Variance; and recognition from the City of Marshalltown that the City will provide approval of the site review. As noted in Section I above, IPL submitted these permits and approvals to the Board on April 17, 2014, and requested issuance of an unconditional Generating Certificate, which the Board issued on May 8, 2014.

With MGS entering into the construction phase, IPL's current permitting focus is two-fold:

1. **Construction Focus:** Ensuring MGS construction activities are complying with all required ongoing permitting requirements necessary for the work involved. This focus is implemented by conducting routine site inspections, reviewing construction reports and records, and ensuring the MGS environmental management plan is being implemented. Additionally, IPL's contractor is obtaining other permits or approvals necessary during the construction process.
2. **Pre-Operational Focus:** Organizing, scheduling, and working on future permit program work associated with the MGS operations. Some examples of work items that fall into this category of permitting support include:
 - a. Creation of the MGS Spill Prevention Countermeasure Control (SPCC) Plan for operations; and

- b. Development of the Title V Air Operating Permit Application for MGS. This permit application needs to be submitted shortly after MGS goes into operation. The application needs to be created prior to the commercial operation start date.

III. Permitting Status – MGS Gas Pipeline

On May 1, 2013, IPL submitted a Petition for Pipeline Permit to the Board, in Docket P-0888. A hearing was held on November 13, 2013, in Marshalltown, Iowa. On November 18, 2013, the Administrative Law Judge issued the Proposed Decision and Order Granting Permit. Since no notice of appeal of the Proposed Decision and Order Granting Permit was filed, the Proposed Decision and Order Granting Permit became a final decision of the Board on December 3, 2013. On May 7, 2014, Pipeline Permit No. 1292 filing was accepted by the Board, under Docket P-0888.

IV. Transmission Status Update

A. Work Completed/Interconnection Details: IPL submitted a request to Midcontinent Independent System Operator, Inc. (MISO) on July 1, 2013, to include MGS in the August 2013 Definitive Planning Phase (DPP) study cycle. The DPP process includes a System Impact Study and a Facilities Study.

The DPP System Impact Study process identifies required system upgrades. IPL was an active participant throughout the DPP System Impact Study process, and worked with MISO and ITC Midwest LLC (ITC-M) to review

and validate study results. After several rounds of review, feedback, and edits by all study participants, MISO issued the final DPP System Impact Study in January, 2014 (MISO August 2013 West Area DPP Group Study, dated January 8, 2014), which IPL filed with the Board on February 24, 2014. The study includes several Multi-Value Projects (MVP) in the base case models that are required for unconditional transmission access. The DPP System Impact Study included, among other information, a thermal overload screening, a stability analysis, and a deliverability study. On May 13, 2014, notification by MISO of an August 2013 West Area DPP Group Re-study was given as a result of withdrawals and changes to multiple projects that impact the final study results. IPL continues to review and participate in the process of the restudy.

The DPP Facilities Study, which was initiated in February 2014, was put on hold pending the outcome of the restudy. The process will resume after completion of the restudy, and will incorporate the restudy results to provide detailed cost estimates for interconnection and upgrades identified in the System Impact Study. IPL will continue to work with MISO and ITC-M throughout the Facilities Study process. IPL anticipates that the August 2013 West Area DPP Group Restudy will be completed prior to the end of 2014 and the DPP Facility Study will be completed within the next few months thereafter. Upon completion, IPL will submit the DPP Facility Study to the Board consistent with Ordering Clause 5 of the November 8th Order.

Once the DPP Facilities Study has been finalized, a Generator Interconnection Agreement (GIA) between IPL, MISO, and ITC-M will be entered

into for MGS. Because of the delay in the process due to the restudy, IPL and ITC are working to enter into a side agreement to allow preliminary engineering and design work related to the upgrades to begin until the GIA can be executed. The scope of the side agreement is limited and the terms are being written to easily transition to the subsequent GIA. The GIA will set the final schedule for the construction of the required ITC-M upgrades, and enable ITC-M to continue forward with construction of those upgrades. IPL currently anticipates that the GIA will be executed late in 2014 or in the first quarter of 2015.

B. MGS Capacity Accreditation: As noted in Section IV.A., the DPP Study included MVP projects in the base case models. Based on current MISO requirements, those projects, in particular MVP #5 the N. La Crosse – N. Madison – Cardinal project (also known as the Badger-Coulee project), would need to be completed prior to MGS receiving unconditional transmission access. Until construction is complete, MGS will not be able to recognize capacity under the existing MISO rules. MVP #5 is currently anticipated to be completed in 2018 after MGS is constructed and operational. In that circumstance, MGS could be operational – providing generation and reliability support to the grid – but not be granted capacity accreditation by MISO. IPL is working with MISO and numerous other stakeholders to find an approach to correct this situation, so that capacity under these circumstances will be recognized. MISO has acknowledged the need to address this issue and is in the process of formulating a proposed solution that is satisfactory to stakeholders. IPL will continue to actively participate in those discussions.

C. Marshalltown Electric Network Modifications: There are no updates regarding the Marshalltown electric network modifications at this time beyond the results of the DPP System Impact Study.

D. Transmission Costs: As discussed in the record, IPL filed a complaint with the Federal Energy Regulatory Commission (FERC) in September 2012, which sought a change to certain cost recovery provisions of Attachment FF of the MISO Tariff that applied to network upgrades within ITC-M's zone. FERC granted IPL's complaint in its July 18, 2013, Order in Docket No. EL12-104-000 (July 18th Order). IPL filed the FERC Order with the Board in its August 1, 2013 Additional Information filing, and noted that:

Assuming a new Schedule FF, revised pursuant to the FERC Order ... most of the transmission system upgrade costs related to MGS would become part of IPL's rate base and billed to customers as part of the revenue requirement established in periodic IPL rate cases in the retail jurisdictions it serves.

(Additional Information at 2)

ITC-M filed a request for a rehearing and, in the alternative, a request for clarification on August 16, 2013, and IPL filed a request for clarification on August 19, 2013. On February 20, 2014, FERC issued an order denying ITC-M's request for rehearing, granting in part and denying in part ITC-M and IPL's respective requests for clarification (February 20th Order). FERC's February 20th Order substantially affirms the July 18th Order. Given that there is not currently a GIA for MGS, the effect of FERC's February 20th Order on MGS is insignificant.

IPL has become aware that ITC-M has an option under the terms of the MISO Generator Interconnection Procedures that enables ITC-M to self-fund the

network upgrades. IPL believes that, if ITC-M self-funds those additional network upgrades, then ITC-M will retain the assets on its books and levy a direct charge on IPL for the additional electric transmission service costs. IPL currently believes that ITC-M will pursue the self-fund option. Under such a scenario, IPL expects those ITC-M costs under the self-fund option to be included as part of IPL's Cost Cap calculation.

V. Construction Status Update – MGS

IPL is utilizing an Engineer-Procure-Construct (EPC) contracting methodology for the Project. IPL has selected Kellogg, Brown and Root, LLC (KBR) as its EPC contractor. IPL executed the EPC contract effective June 1, 2014, providing KBR with a Full Notice to Proceed (FNTP).

A. Engineering: Current engineering activities are focused on Civil, Structural, and Architectural drawings, including but not limited to site layout plans, and final grading drawings to issue for construction (IFC). Design activities continue for Balance of Plant (BOP) and detailed thermal cycle analysis.

B. Procurement: KBR is currently finalizing negotiations with its three major prime sub-contractors. KBR has selected Siemens as the major combustion turbine and steam turbine generator Original Equipment Manufacturer (OEM) supplier. KBR continues working on all other miscellaneous procurement activities to meet the overall project schedule.

C. Construction: KBR mobilized to the construction site the week of June 2, 2014. The civil subcontractor, McAninch, is currently grading the site, preparing material laydown areas, excavating for circulating water pipe, performing lime stabilization, underground piping work, and excavating the storm water retention pond.

A groundbreaking ceremony was held at the MGS construction site on July 15, 2014. This event was attended by federal, state, and local officials, members of the community, and both IPL and KBR project staff.

IPL continues to anticipate that MGS will be on-line in the second quarter of 2017.

VI. Construction Status Update – MGS Gas Pipeline

IPL has finalized the pipeline route, and has obtained 100% of the associated land easements. IPL is finalizing contractual terms for the construction of the pipeline. IPL anticipates executing that scope of work Q3, 2014. IPL currently anticipates the construction of the pipeline to be completed in the third quarter of 2015. As contained in Docket P-0888, IPL will submit weekly reports to the Board regarding construction of the pipeline, once construction commences.

VII. MGS Project Cost

The Cost Cap as identified in the Board Order is \$920 million. As of July 31, 2014, the capitalized project costs consisted of capital expenditures of \$45.4

million and AFUDC of \$1.1 million. IPL anticipates that the Project will be completed within the Cost Cap.

<u>Total Project Costs – Status as of July 31, 2014</u>	
Plant & Pipeline	\$ 45.4
Transmission	\$ -
AFUDC	\$ 1.1
Cost to Date	\$ 46.5
<hr/>	
IUB Cost Cap	\$ 920.0
<i>(\$ shown are in millions)</i>	

IPL has not yet received the detailed cost estimate for Transmission Upgrades.

STATE OF IOWA
DEPARTMENT OF COMMERCE
UTILITIES BOARD

IN RE: INTERSTATE POWER AND LIGHT COMPANY	DOCKET NO. GCU-2012-0001
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CERTIFICATE OF PUBLIC CONVENIENCE, USE, AND NECESSITY

Permit No. GCU-2012-0001 Docket No. GCU-2012-0001

Date Issued May 8, 2014 Location Marshalltown, Iowa

WHEREAS, on the 26th day of December, 2012, the Iowa Utilities Board accepted the application of Interstate Power and Light Company for a certificate of public convenience, use, and necessity authorizing the construction of a nominal 600 MW natural gas-fired, combined-cycle electric generating facility located at Marshalltown, Iowa, and known as the Marshalltown Generating Station, as provided for and under the provisions of Iowa Code chapter 476A; and

WHEREAS, upon notice and in accordance with the provisions of Chapter 476A, the presiding officer found that the application for construction of the facility should be granted by order dated November 8, 2013, and clarified on December 9, 2013, subject to issuance of final pre-construction permits, and that said orders became the final orders of the Board within 15 days of their issuance pursuant to 199 IAC 7.6(2); and

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PAGE 2

WHEREAS, Interstate Power and Light Company notified the Iowa Utilities Board on April 17, 2014, that all final pre-construction permits had been obtained that could be obtained prior to commencement of construction; and

WHEREAS, the time for appeal of the Iowa Utilities Board's November 8, 2014, order to the Iowa district court has expired:

NOW THEREFORE, pursuant to the orders of the Iowa Utilities Board and the provisions of Iowa Code chapter 476A, this Certificate is issued and permission and authority are hereby granted to Interstate Power and Light Company to build, construct, maintain, and operate and to operate and maintain other apparatus and appurtenances necessary for generating electricity at its facility located at Marshalltown, Iowa.

Applications to significantly alter the facility shall be made in accordance with Iowa Code chapter 476 and the 199 IAC 24.

This Certificate is granted and issued from and after the date of issuance subject to significant alterations as provided by law, and this Certificate shall be subject to and governed by all the provisions, conditions, and requirements of Iowa Code chapter 476A (2013), and by all the provisions, rules, and regulations of the Iowa Utilities Board as now exist or may hereafter be ordered or required by the Iowa Utilities Board, as may be applicable. This certificate shall be in perpetuity, except that the certificate must be surrendered in the event Interstate Power and Light Company does not proceed with construction and must withdraw its application for certificate pursuant to Iowa Code section 476.53(3)"f."

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Notice of this proceeding was provided to other state agencies, county, and city authorities. Other applicable pre-construction permits have been issued. In accordance with Iowa Code § 476A.8 (2013), no regulatory agency, city, or county shall require any further approval, permit, or license for construction of the facility authorized in this Certificate other than requirements relating to the protection of employees engaged in the construction, except that Interstate Power and Light Company will have to obtain a series of permits from the city of Marshalltown during the construction process, which permits are tied to various phases of underlying construction activities and cannot be obtained in advance of construction. Interstate Power and Light Company provided a letter indicating the city of Marshalltown's intent to grant the required permits, when appropriate. In accordance with Iowa Code § 476A.8 (2013), no regulatory agency shall hold any other proceeding or oral presentation, or require any other license or permit for the construction of the facility as authorized by this Certificate, except as noted in this paragraph.

During the period of time this Certificate is in force, the right of eminent domain is not necessary and, therefore, not included by the Iowa Utilities Board in granting this certificate.

IT IS FURTHER PROVIDED AND IS A CONDITION OF THIS CERTIFICATE that the Iowa Utilities Board retains jurisdiction and may at any time hereafter and

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PAGE 4

during the period of this Certificate, make further orders and regulations as may be necessary.

Signed and sealed on the 8th day of May, 2014.

UTILITIES BOARD

/s/ Elizabeth S. Jacobs
Chair

ATTEST:

/s/ Joan Conrad
Executive Secretary