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> Brian J. Rybarik Deputy General Counsel

August 14, 2018

Ms. Kimberly D. Bose Secretary Federal Energy Regulatory Commission 888 First Street, N.E. Washington, D.C. 20426

Re: Remote Local Balancing Authority Agreement Between MidAmerican Energy Company as the MEC Local Balancing Authority and Interstate Power and Light Company, Docket No. ER18-\_\_\_\_\_

Dear Secretary Bose:

MidAmerican Energy Company ("MEC"), as the MEC Local Balancing Authority ("MEC LBA") and Interstate Power and Light Company ("IPL"), hereby jointly tender for filing, pursuant to 18 C.F.R. § 35.3 (a) (2) of the Commission's regulations, the proposed Remote Local Balancing Authority Agreement ("RLBAA") between MEC and IPL (the "Parties"). The Parties request that the Commission approve the proposed RLBAA to become effective October 12, 2018.

# **Description of Filing**

To facilitate the fulfilment of MEC's obligations as a Local Balancing Authority ("LBA") operator, MEC requests entities that operate energy facilities located within the MEC LBA to enter into a LBA agreement. The RLBAA is required due to English Farms Wind Project, LLC executing a Generator Interconnection Agreement with MEC and the Midcontinent Independent System Operator, Inc. ("MISO"), for a wind farm to be engaged in the generation and sale of electric power and energy within the MEC LBA. IPL has subsequently acquired the rights, title and interest in this wind farm. The wind farm will be operated in coordination with the MISO Balancing Authority as a resource physically located in the MEC LBA area, but through dynamic metering/scheduling, effectively located in the Alliant West Local Balancing Authority ("ALTW LBA") Area. The RLBAA outlines the framework for the coordination and communication of operational and metering information between MEC and IPL in support of MEC's functions as the MEC LBA.

### **Communications**

The Parties request that all issuances, filings, and communications be served upon the following persons:

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### For MEC:

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### For IPL:

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Senior Attorney
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### **Effective Date**

Consistent with the notice provisions at 18 C.F.R. § 35.3 of the Commission's regulations, the Parties request the proposed RLBAA to become effective on October 12, 2018.

# Requisite Agreements

All the necessary agreements have been obtained.

## **Compliance with the Commission's Filing Regulations**

The following materials are submitted with this filing:

- (a) Letter of transmittal; and
- (b) RLBAA.

The Parties believe that the information contained in this letter provides sufficient information upon which to accept this filing; however, to the extent necessary, the Parties respectfully requests that the Commission waive its filing requirements contained in Section 35.12 of the Commission Regulations.

A copy of this filing was served upon the following:

Iowa Utilities Board MISO ITC Midwest

If you have any questions, please do not hesitate to contact me immediately.

Sincerely, Brian J. Rybarik

Brian J. Rybarik Deputy General Counsel

# REMOTE LOCAL BALANCING AUTHORITY GENERATOR INTERCHANGE AGREEMENT BETWEEN INTERSTATE POWER AND LIGHT COMPANY AND MIDAMERICAN ENERGY COMPANY

This Remote Local Balancing Authority Generator Interchange Agreement ("Agreement") is by and between Interstate Power and Light Company ("IPL") and MidAmerican Energy Company ("MEC") (collectively, the "Parties") in connection with a Generator Interconnection Agreement dated as of September 5, 2017 (the "GIA"), by and between English Farms Wind Project LLC ("English Farms"), MEC, and Midcontinent Independent System Operator, Inc. ("MISO").

### RECITALS

WHEREAS, MEC is the Local Balancing Authority (MEC LBA) for the MEC Local Balancing Authority Area that operates in the states of Iowa and Illinois; and

WHEREAS, English Farms was the developer of a 170 MW wind farm located in Poweshiek County, Iowa, designated as Project No. J438 in the MISO generator interconnection queue; and

WHEREAS, English Farms, MEC, and MISO entered into the GIA on September 5, 2017 which was filed with the Federal Energy Regulatory Commission (FERC) on September 19, 2017 in Docket No. ER17-2503; and

WHEREAS, on December 15, 2017, English Farms assigned and transferred to IPL all of its right, title and interest in and to all of the properties, assets and rights of any kind owned by English Farms for the purpose of developing the 170 MW wind-powered electricity generating facility known as the English Farms Wind Farm and the rights and obligations under the GIA; and

WHEREAS, pursuant to Article 9.2 of the GIA, IPL wishes to locate the English Farms Wind Farm through dynamic metering/scheduling in a Local Balancing Authority Area within the MISO Balancing Authority Area other than the Local Balancing Authority Area in which the English Farms Wind Farm is physically located; and

WHEREAS, effective upon energization of the collector substation, the English Farms Wind Farm will be located in the ALTW Local Balancing Authority Area; and

WHEREAS, effective upon energization of the collector substation, the English Farms Wind Farm will become a physical tie between the ALTW and MEC Local Balancing Authorities within the MISO Balancing Authority; and

WHEREAS, this Agreement shall become effective upon execution by the Parties subject to acceptance by the FERC, or if filed unexecuted, upon the date specified by the FERC.

NOW, THEREFORE, in consideration of the mutual promises contained herein, the Parties agree as follows:

- IPL agrees to pay MEC for all costs incurred for reliable implementation of the MISO Local Balancing Authority assignment and establishing the new physical tie between the ALTW and MEC Local Balancing Authorities. IPL will be billed actual costs incurred by MEC.
- 2. IPL agrees to provide MEC with a physical connection to the revenue meter, at no cost to and if requested by MEC. MEC and IPL will cooperate to define the telecommunications path from the new physical tie to the ALTW LBA control center, as mutually agreed upon during the detailed engineering phase of the project and if required.
- This Agreement, to the extent there is no applicable Federal law or Federal law requires application of state law, shall be governed, construed, and enforced in accordance with the laws of the state of Iowa, without regard to its conflicts of law principles. To the fullest extent permitted by law, each of the Parties hereto waives any right it may have to a trial by jury in respect of litigation directly or indirectly arising out of, under or in connection with this Agreement. Each Party further waives any right to consolidate any action in which a jury trial has been waived with any other action in which a jury trial cannot be or has not been waived.
- 4. This Agreement may be executed in two or more counterparts, each of which is deemed an original but all constitute one and the same instrument.

IN WITNESS WHEREOF, the Parties have caused this Agreement to be executed by their duly authorized representatives as of July 31, 2018.

#### INTERSTATE POWER AND LIGHT COMPANY

By: Terry Kouba

Optally report by Terry Kouba

UK are Terry Kouba an-Alliant Energy, our-IPL Operation
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Date 2018 07 81 19 58 18 -0100

Name: Terry Kouba

Title: VP Operations - Iowa

MIDAMERICAN ENERGY COMPANY

By:

Name: James W. Dougherty

Title: Vice President, Electric Delivery