Central Iowa Power Cooperative
A Touchstone Energy® Cooperative

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February 5, 2026

Scott County, IA Board of Supervisors
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Honorable Scott County Supervisors:

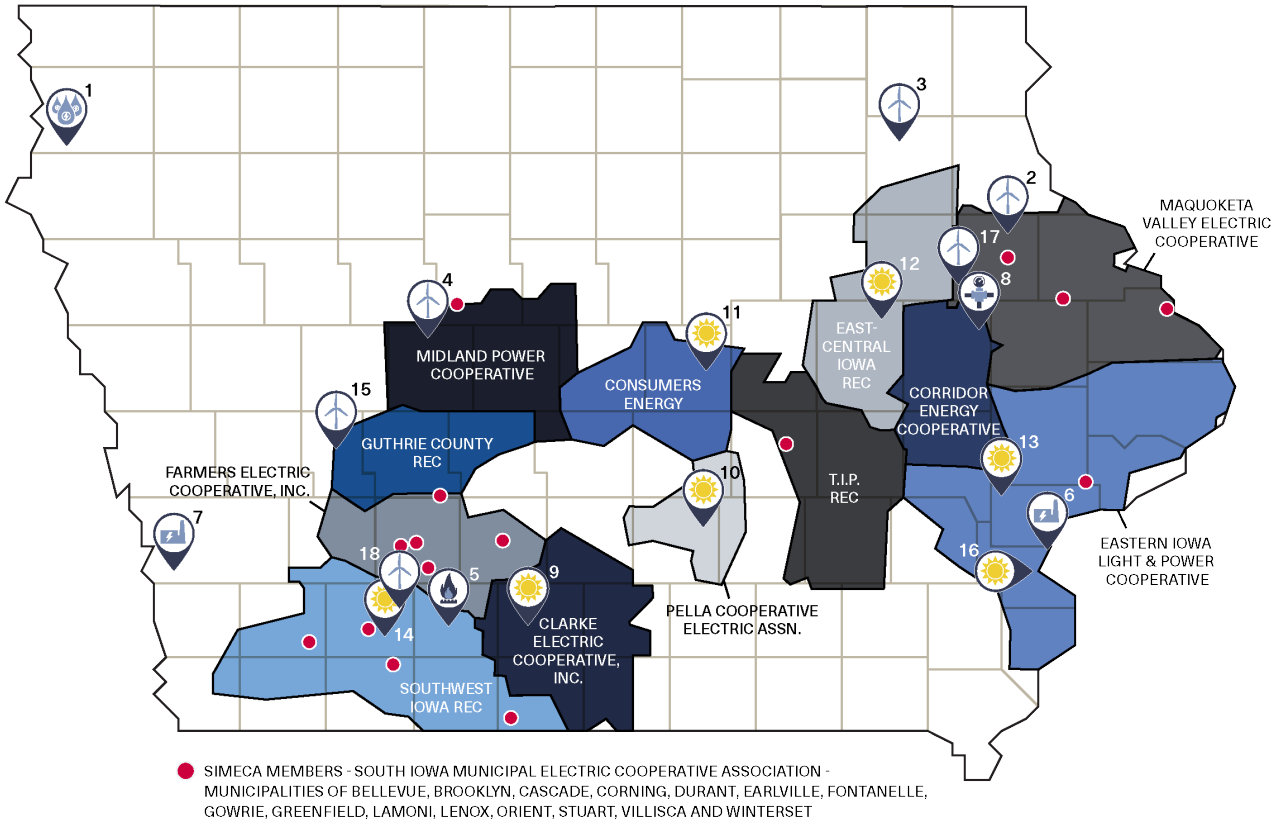
Central Iowa Power Cooperative (CIPCO) respectfully submits this document to provide a holistic perspective on our application to request that Scott County create a 15th category in your zoning ordinance for a special use permit that would allow for the construction of a thermal electric energy generation facility on land that is currently zoned as Agricultural Preservation (AP). While the initial process allowed CIPCO to submit information to the Planning and Zoning Commission and the Board of Supervisors, our cooperative has not been given a formal opportunity to appear before the Supervisors since October 23, 2025, which at the time of this submission, has spanned over 100 days. Before the Supervisors resume consideration of the application, we believe it is imperative that the Board considers the facts contained herein.

I. WHO IS CIPCO

Central Iowa Power Cooperative (CIPCO) is a generation and transmission cooperative owned by 13 member-owned rural electric distribution cooperatives and associations that together provide power to over 300,000 Iowans and 13,000 commercial and industrial accounts across 58 counties. Our mission is to provide Member-owners with wholesale power and services in a safe, reliable, and cost-effective manner.

Through our diverse, all-of-the-above energy portfolio, we provide energy to help power our rural and urban communities, our state, and our economy. CIPCO and its Member-owners serve approximately 53% of the rural electric cooperative meters in Iowa.

CIPCO is headquartered in Cedar Rapids, IA, with an administrative office in Des Moines, and utility operations located in Creston and Wilton. CIPCO's owned and contracted generating assets that serve our member cooperatives and associations are located across Iowa, in proximity to the areas we serve.



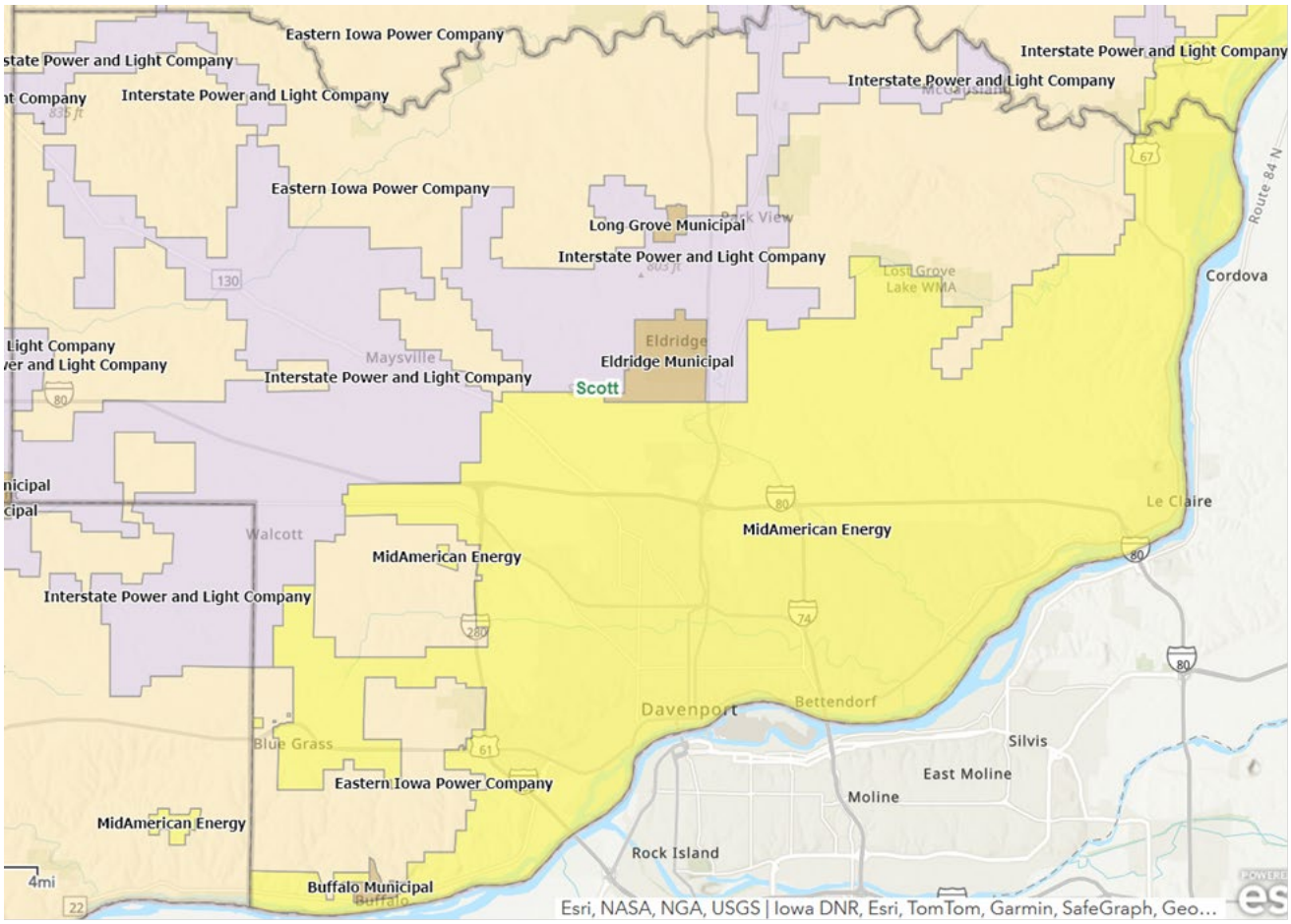
1	Western Area Power Administration	Hydroelectric
2	Elk Wind Farm, Greeley	Wind
3	Hawkeye Wind Farm, Hawkeye	Wind
4	Rippey Wind Farm, Grand Junction	Wind
5	Summit Lake, Creston	Natural Gas
6	Louisa Generating Station, Muscatine	Coal
7	Walter Scott, Jr. Energy Center #3 & #4, Council Bluffs	Coal
8	Linn County Solid Waste Agency, Marion	Landfill Gas Generation
9-14	Solar Sites: Osceola, Pella, Marshalltown, Urbana, Wilton, and Corning	Solar
15	Heartland Divide Wind Energy Center, Audubon	Wind
16	Wapello Solar LLC, Wapello	Solar
17	Independence Wind Energy, Ryan	Wind
18	Prescott Wind Energy, Prescott	Wind

II. NEXUS IN SCOTT COUNTY

As noted above, CIPCO is a generation and transmission cooperative owned by its member distribution cooperatives. One of those member-owners is Eastern Iowa Light & Power Cooperative (EILP), headquartered in nearby Wilton, Iowa, in Cedar County. EILP provides electric service across portions of southeast Iowa, serving members in 12 counties, and delivers electricity to the largest geographic area of unincorporated Scott County.

EILP serves more than 3,000 electric accounts in rural areas of Scott County, reflecting a long-standing relationship between the cooperative and the county. That relationship dates back to September 17, 1935, when EILP was founded at Swains Hall in McCausland, Iowa.

The Scott County Electric Service Areas are shown below. Eastern Iowa Light & Power Cooperative serves the tan shaded areas:



Source: Iowa Utilities Commission

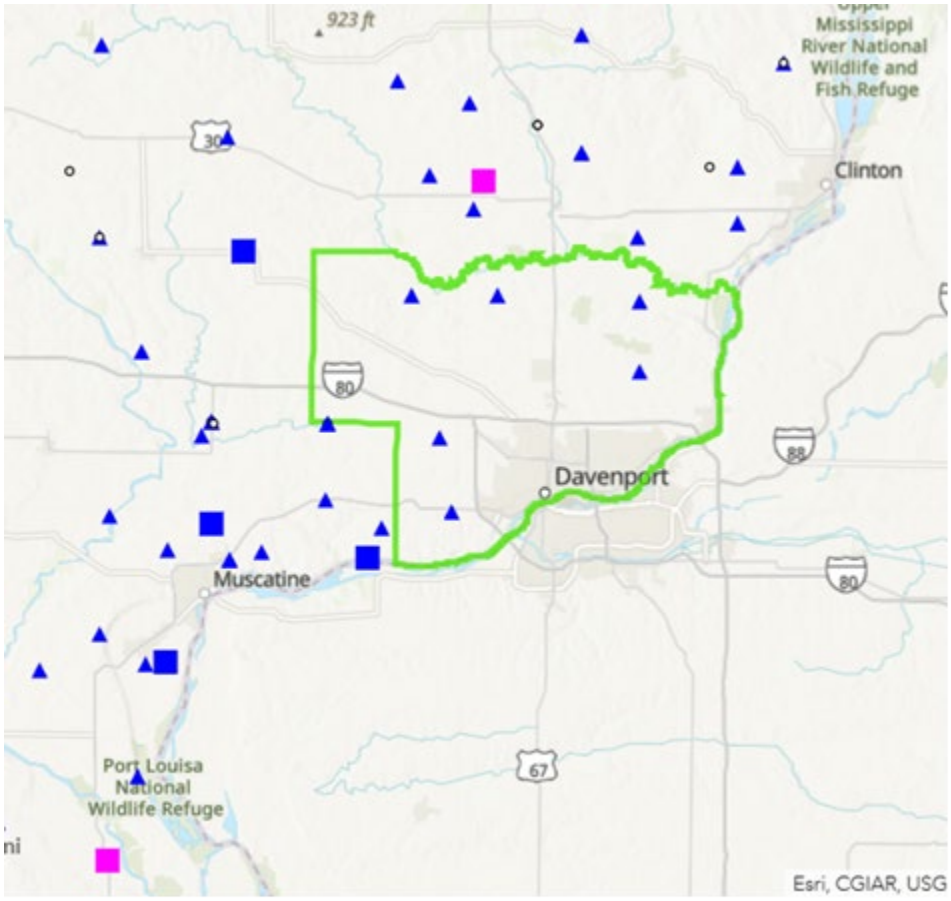
CIPCO has demonstrated that its cooperative system requires additional generating resources to meet the electricity demands of its existing consumers. Scott County energy users, like those in the other 58 counties served by CIPCO and its member cooperatives, would directly benefit from the construction of the Hickory Grove Generating Station (HGGS).

In Scott County alone, more than 3,000 electric accounts receive power through EILP and CIPCO. These accounts are not a one-to-one proxy for population, as they include homes, farms, and businesses that serve multiple individuals and economic activities at each service location. While the precise number of residents who would directly benefit from HGGS can be debated, what is not subject to interpretation is that Scott County residents and businesses have a demonstrable and growing need for additional reliable electric generation to support daily life, economic activity, and essential services.

Surprisingly, Scott County's website, https://www.scottcountyiowa.gov/profile/utilities-communications, inaccurately identifies electric utility suppliers in the county with the omission of EILP/CIPCO. Scott County

does get a portion of its electric and natural gas service from investor-owned and municipal utilities. However, the county's public information is clearly incomplete, inaccurate, and does not tell the whole story of energy providers in the community.

CIPCO and EILP have significant infrastructure located throughout Scott County including transmission and distribution electric power lines, as well as substation equipment dotting the unincorporated landscape and providing reliable service to the citizens of Scott County.



Key: Triangles represent REC Electric Distribution Substations.
Squares represent CIPCO Transmission Subs

Property Taxes – CIPCO and EILP's existing infrastructure and electric service operations currently generate approximately $100,000 per year in property tax revenues for Scott County.

HGGS is expected to generate substantial additional tax revenues for Scott County. Pursuant to Iowa Code chapter 437A, in lieu of local property tax assessment, HGGS will be subject to (1) annual replacement tax at a rate of six hundredths of one cent ($0.0006) per kilowatt hour of electricity it generates and (2) natural gas delivery tax at a rate of one and eleven hundredths of one cent ($0.0111) per therm of natural gas delivered to the site. While actual generation is anticipated to vary from year to year, the addition of HGGS to the taxpayer rolls will likely double the amount of property taxes CIPCO currently pays to Scott County, a significant benefit to the entire county.

III. SCOTT COUNTY ZONING EVALUATION

Following approval by the CIPCO Board of Directors to pursue the Hickory Grove site in Scott County as the location for a new generating resource, CIPCO staff engaged Scott County professional staff, as well as Board of Supervisors Chair John Maxwell, to initiate discussions regarding the appropriate pathway for siting a thermal electric energy generation facility within Scott County.

Through those discussions, it was determined that Scott County had no existing ordinances that specifically addressed or restricted the siting of a thermal electric energy generation facility. As a result, CIPCO identified two potential paths forward: (1) seek to rezone the Agricultural-Preservation (A-P) parcel to an industrial zoning designation, or (2) propose a zoning text amendment to establish a special use permit (SUP) category that would allow a thermal electric energy generation facility to be developed while retaining the A-P zoning designation.

Scott County has shown willingness to establish SUP categories that allow A-P zoned land to be used for purposes other than directly related to agriculture. In fact, 14 other SUP categories exist today. SUP categories range from communication towers and antennas, county and municipal facilities, extraction, and material processing for the removal of coal, stone, gravel, sand, clay, and topsoil, solid waste transfer stations, private non-commercial airstrips, and most recently, SUP category 14 – large wind generators with a rated capacity of more than 100 kW.

Furthermore, within A-P zoning districts, Scott County includes the following as an explicit Principal Permitted Use: franchised electric transmission and gas/commodity pipelines and associated structures and equipment, including substations.

Based on this research and guidance from county officials, CIPCO elected to pursue an application to the county to consider a zoning text amendment to add Thermal Electric Energy Generating Facilities as the 15th special permitted use within A-P zoning districts.

With some clarity on the appropriate process to meet the requirements of the county's zoning procedures, CIPCO continued working with county staff to prepare the necessary information and documents that would allow for the process to officially begin with the filing of an application with the county. In addition to that communication, CIPCO began outreach to the additional four Supervisors. Those conversations took place between June 22 and August 25, 2025, when an introductory phone call and informational briefing was held with Supervisor Bribriesco. Supervisors Beck, Dickson, and Paustian were all contacted in either late June or early July of 2025.

IV. SCOTT COUNTY PROCESS INITIATED

After completing the necessary research and additional preparations throughout July 2025, CIPCO staff attended the August 5, 2025, meeting of the Scott County Planning and Zoning (P&Z) Commission to introduce the cooperative to the Commissioners and to informally discuss CIPCO's intent to file an application for the creation of a special use permit (SUP). CIPCO staff attendance and participation are reflected in the official meeting minutes, which are publicly available on the Scott County website.

On August 8, 2025, CIPCO formally filed its application with Scott County requesting the creation of a special use permit category for thermal electric energy generation facilities.

Consistent with the Planning and Zoning Commission's meeting schedule, CIPCO appeared before the Commission for the first public hearing on its application on September 2, 2025. No action was taken at that meeting. CIPCO subsequently appeared before the Commission for a second public hearing on September 16, 2025.

Although not required by county ordinance, the Commission elected at the September 16 meeting to hold a third public hearing on October 7, 2025, following CIPCO's planned community open house in Maysville. The open house was held on October 2, 2025, at the Maysville Community Center and Fire Department and was intended to educate and inform community members about the proposed HGGS. All seven Planning and Zoning Commissioners, all five members of the Board of Supervisors, and Scott County–area state legislators were invited to attend the open house.

Following the open house event, the Planning and Zoning Commission convened a third public hearing on October 7 where all Commissioners present voted in favor (6-0) to recommend the Board of Supervisors take up and approve the creation of a 15th SUP for thermal electric energy generation facilities.

V. SCOTT COUNTY BOARD OF SUPERVISORS ACTIVITY

In accordance with Scott County's established procedures, Chairman Maxwell placed CIPCO's application on the Board of Supervisors' agenda and scheduled the fourth public hearing for October 21, 2025. To ensure adequate preparation for the Board's initial consideration, representatives from CIPCO met with Chairman Maxwell on October 15, 2025, to review the procedures that would be followed during the Committee of the Whole meeting preceding the Board's regular meeting. During that discussion, Chairman Maxwell outlined the information he and the Board wished to have presented. At the October 21 meeting, CIPCO presented information related to the application and voluntarily provided additional details regarding the HGGS, even where not required.

Chairman Maxwell subsequently placed the fifth public hearing on CIPCO's application on the Board's agenda for October 23, 2025. CIPCO attended that hearing and remained available to respond to questions or requests for additional information.

During the October 23 public hearing, a representative of the Concerned Citizens of Scott County raised objections to the proposed zoning text amendment, CIPCO's HGGS project, and alleged conflicts of interest involving members of the Planning and Zoning Commission, the Zoning Board of Adjustment, and Chairman Maxwell. Although all five Supervisors had been informed of the project by CIPCO and county staff in June, July, and/or August 2025, Supervisors Paustian and Bribriesco expressed concerns that the process had been rushed and stated that the conflict-of-interest allegations warranted review. The Board subsequently voted to table CIPCO's application. At that time, Chairman Maxwell indicated an anticipated delay of approximately one month.

During November 2025 through January 2026, CIPCO made repeated inquiries to county staff and Chairman Maxwell regarding the status of the County Attorney's review of the conflict-of-interest allegations. It was CIPCO's understanding that the continued delay was attributable to the conflict-of-interest review, rather than due to any deficiency in CIPCO's application. It was also CIPCO's understanding that based on the outcome of the County Attorney's investigation and opinion, CIPCO would be given the opportunity to continue to advance the SUP application through the regular process. While the allegations were relatively straightforward the review process extended for nearly three months. To date, CIPCO has still not been

officially informed that the County Attorney has issued an opinion, nor has there been any documentation shared with CIPCO confirming that the allegations of conflict-of-interest have been resolved.

Instead, following a request for information that CIPCO is unable to provide, Chairman Maxwell appears to have concluded that CIPCO was unwilling to cooperate with the Board of Supervisors. CIPCO was therefore surprised by public statements attributed to Chairman Maxwell in the *Quad-City Times* on January 28, 2026, indicating opposition to the HGGS project and stating that he, along with Supervisors Bribriesco, Dickson, and Paustian, intended to vote against the application based on a perceived lack of need for the proposed generating facility. Notably, these statements reflect opposition to the HGGS project itself, rather than to the procedural question of whether a special use permit category should be established.

Only recently on February 3, 2026, was CIPCO informed that the Board of Supervisors intends to bring the application back for consideration by the Board of Supervisors on February 10, 2026, which will constitute the sixth public hearing on the proposed SUP category for thermal electric energy generation facilities. As of that date, more than 235 days will have lapsed since CIPCO first engaged county staff regarding zoning procedures, more than 180 days since CIPCO's initial appearance before the Planning and Zoning Commission, and more than 120 days since the Planning and Zoning Commission voted 6-0 to recommend the Board of Supervisors take up and approve the creation of a 15th SUP for thermal electric energy generation facilities.

VI. ADDITIONAL REQUESTS FOR INFORMATION FROM SCOTT COUNTY

Since the suspension of CIPCO's application on October 23, additional requests for information from CIPCO have been made by county staff and/or Chairman Maxwell. At no point before or since the action by the Supervisors on October 23 has CIPCO refused to offer accurate and credible information to meet the demands of Mr. Maxwell or the other Supervisors. Unfortunately, the last request for information from Chairman Maxwell is unable to be compiled by CIPCO because frankly, the information and data requested does not exist in the manner that Mr. Maxwell wishes to see.

Shortly before Thanksgiving, CIPCO was asked to provide information to the county about alternative locations both within and near the community and why those sites were not being explored by CIPCO to build a natural gas peaking facility. CIPCO had already fielded verbal inquiries about why the cooperative was not "repowering" the decommissioned Fair Station coal plant that CIPCO previously closed. CIPCO provided information about Fair Station to the Board of Supervisors in a submission of information on November 4, but the most recent inquiry was specific to MidAmerican Energy's now closed Riverside facility. Additionally, CIPCO has also fielded questions about an alternative site near Princeton in northeast Scott County. Further information about Fair Station, Riverside, and Princeton are included later in this document.

As the calendar flipped to December, Chairman Maxwell and county staff made inquiries to CIPCO about additional data and information with regards to expected emissions that would come from the operation of the HGGS. CIPCO worked with county staff to ensure that verifiable third party information could be used by Mr. Maxwell and the rest of the Supervisors to determine the validity of the information previously submitted by CIPCO, including the operation of similar turbines in Omaha at the Turtle Creek Station and the planned use of the same F-Class Siemens turbines that will be installed and operated by MidAmerican Energy at their Orient facility in Adair County. This information is reiterated and summarized later in this filing.

After the New Year, Scott County staff received additional information from CIPCO that detailed the list of federal, state, and local permits that the cooperative would be required to obtain to operate the HGGS if it

were to be constructed. That list was submitted to the county on January 7. Later that same day, CIPCO also submitted to the county the transcript of an Iowa Utilities Commission hearing that took place in December. In that submission, CIPCO directed county staff to note that in the sworn testimony of a witness in the matter, Cerro Gordo County's attorney appeared to substantiate a key tenant of CIPCO's argument in Scott County that the energy density of the HGGS was the most efficient use of land to produce electricity.

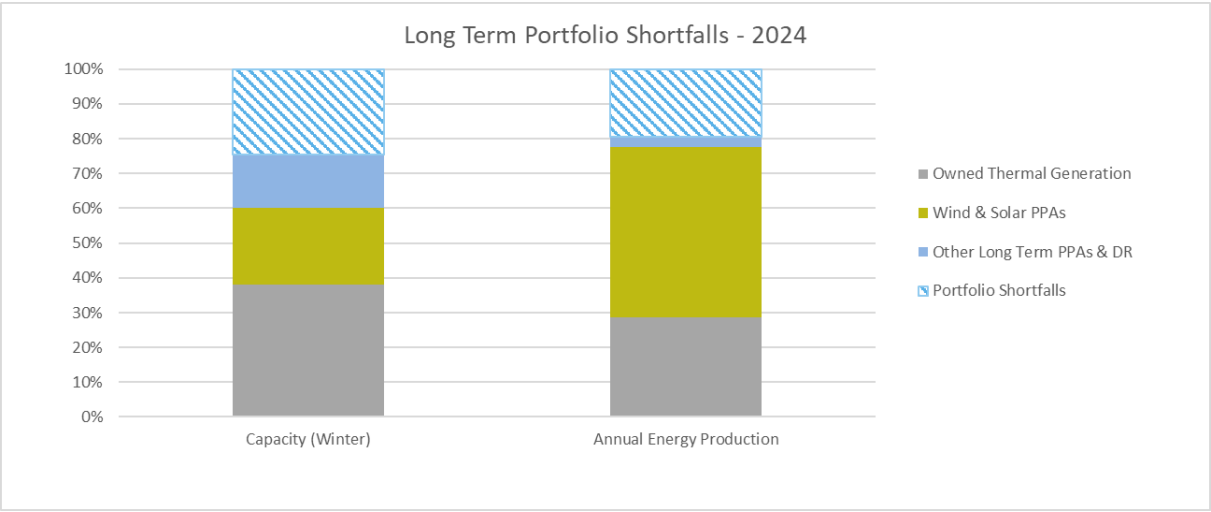
Shortly after the information submitted on January 7, Chairman Maxwell verbally requested that CIPCO provide information that demonstrated the "need for Scott County" to allow for the HGGS to be constructed. Mr. Maxwell asked for historical electricity usage, projected usage from Scott County, projected closure of coal generation facilities in Iowa, as well as the amount of capacity available to Scott County on a daily basis. While CIPCO felt comfortable providing three of the four data points, we cannot determine the amount of generation that is at the county's disposal on any given day. In short, that kind of information is virtually impossible for one utility to obtain. While CIPCO can reasonably project the capacity of our portion of the electric grid; the flow of electricity does not necessarily begin and end at the borders of Scott County. To claim that CIPCO is unwilling to provide that type of information is inaccurate; we simply are unable to. However, it appears that because CIPCO was unable to provide the information in a format that was appealing to Chairman Maxwell, he along with a majority of the other Supervisors are prepared to vote to reject CIPCO's application to create the SUP for thermal electric energy generation facilities.

VII. CIPCO NEED AND NECESSITY

During each of the public hearings before the Scott County Planning & Zoning Commission and Board of Supervisors, CIPCO has consistently and thoroughly explained the need for HGGS.

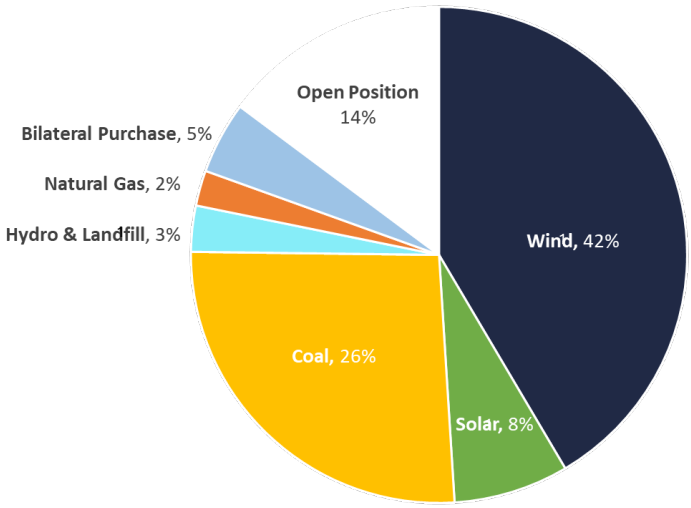
Under CIPCO's all-requirements supply contracts with its members, it is obligated to provide generating capacity to meet the needs of its members and associations through at least 2062. CIPCO maintains a set of strategic and risk management goals that underpin its commitment to providing a stable, reliable, and cost-competitive power supply.

CIPCO's current portfolio mix is illustrated below. The short term bilateral and spot market purchases indicate CIPCO's shortfall in both accredited capacity and annual energy production.



CIPCO strives to maintain a diverse power supply portfolio that seeks to avoid too much reliance on a single type of generation. During 2024, wind[1] was our largest source of energy representing 42%. Our minority ownership in three of Iowa's coal units represents 26%. Solar[1] has been a growing element of our power supply at 8%, natural gas peaking currently provides only 2% of our supply, and hydro and landfill[1] round out the sources at 3%. The 5% of bilateral purchases represent short-term purchase contracts with other utilities, and CIPCO's current 14% open exposure.

CIPCO 2024 Sources of Energy Supply



This open position and accredited capacity deficiency represent the problem we need to solve. Currently, CIPCO relies on volatile day-to-day purchases on the regional energy markets to meet the current needs of our membership.

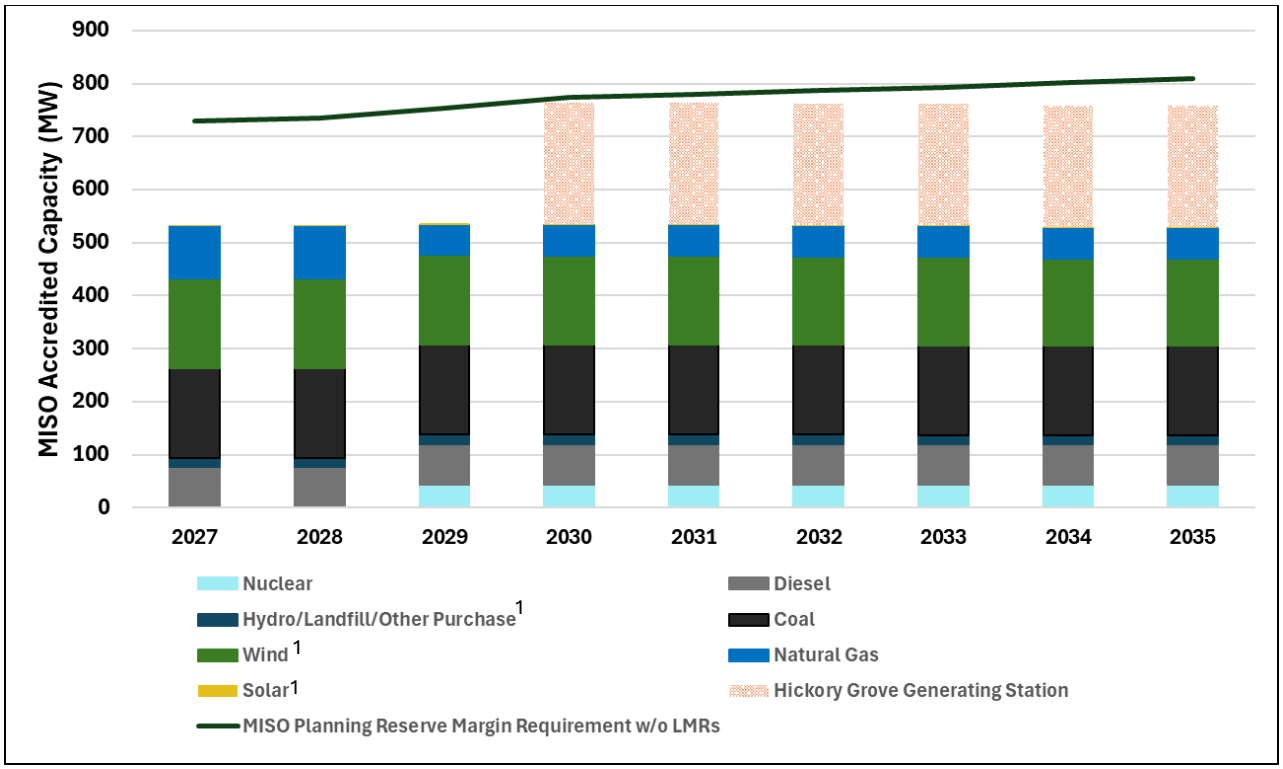
CIPCO's membership has experienced modest yet sustained demand growth in recent years, and that is projected to continue. Additionally, increasingly severe weather and ongoing depletion of regional dispatchable capacity have led the Midcontinent Independent System Operator (MISO) to reform the resource adequacy rules with which CIPCO must comply. As a result, long-term portfolio deficits presently exist in both accredited generating capacity and energy production. This increases concerns about rate stability for CIPCO's membership and contributes to weakening regional bulk electric system reliability.

In 2024, CIPCO completed a comprehensive resource planning effort in consultation with professional industry advisors utilizing its latest long term load forecast. The load forecast was compared against existing resources using MISO's resource adequacy rules. CIPCO's strategic risk management goals were then considered in conjunction with the stochastic modeling efforts. The results clearly showed that CIPCO's acute near-term needs include accredited capacity, on-peak energy, and dispatchable energy security for severe weather events.

[1] *CIPCO contracts with energy producers for the electricity output from wind, solar, hydro, and methane gas from a landfill (converted into electricity). CIPCO does not claim these resources as renewable within our supply portfolio as we have either sold to third parties or do not receive the renewable attributes associated with the electricity produced from these renewable power sources. By selling these attributes (RECs), we not only support other organizations in meeting their renewable energy goals, we also generate revenue to help us lower our wholesale power rate to our member-owners.*

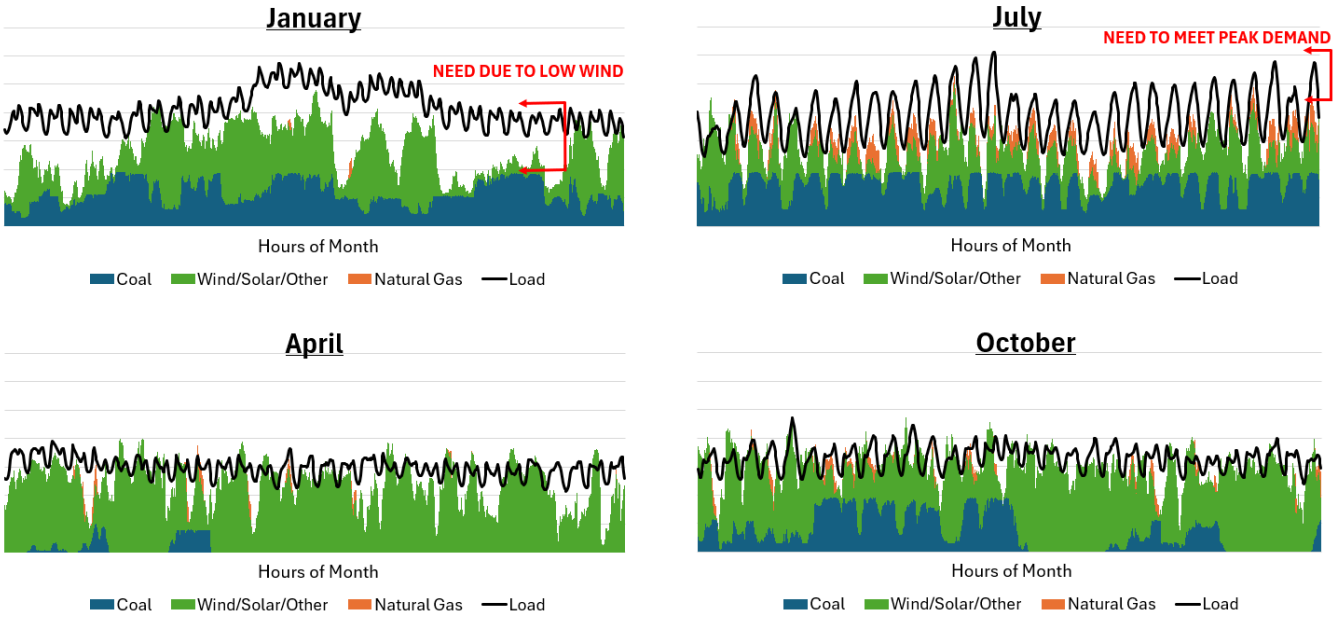
CIPCO's comprehensive resource planning effort utilized best-in-class power supply planning software to evaluate the economics and risks associated with different combinations of resources as dispatched economically into the MISO energy market. The study used numerous assumptions provided by CIPCO regarding existing generating resource attributes and remaining life. Long-term fuel and electricity market forecasts, as well as variable and fixed operating and maintenance costs, depreciation, interest, and other fixed costs unique to each resource type, were also used as inputs to the modeling effort. CIPCO's analysis stochastically iterated numerous combinations of resources that would meet CIPCO's portfolio risk objectives to find the optimal resource deployment plans for a range of possible future scenarios. Sensitivity tests were performed on the scenarios and stress-tested against each of the other scenarios by calculating the present value of the necessary revenue requirement over the 26-year period using a 6% discount rate to identify the optimal balance of cost and risk.

Resource Planning Results: CIPCO's comprehensive planning efforts determined the best immediate solution is the deployment of a simple-cycle F-Class combustion turbine generator with approximately 250 MW of generating capacity to fill CIPCO's capacity deficit and maintain reliable service for its cooperative members.



As illustrated, HGGS will solve CIPCO's acute near-term needs to address its accredited capacity deficit.

To further explain why peaking generation like HGGS is needed, this illustration shows a typical hourly load profile with hourly generation for the months of January, April, July, and October, representing the four seasons and showing the seasonal variability of load and resources here in Iowa. Each up and down cycle of the load profile represents one day.



CIPCO's cooperative members experience the highest demand for electricity in the summer, while winter is close behind. Spring and fall months are completely different. When weather is moderate, homes and businesses use much less energy for cooling or heating. As illustrated, the peak demand in July is nearly double that of April.

Iowa, especially western Iowa, benefits from a lot of consistent wind at speeds that are conducive to generating electricity. Therefore, in the spring and fall months, like what is shown for April, most of CIPCO's power is sourced from wind and solar, supplemented by coal and natural gas when necessary. As you turn to summer and winter, demand increases, wind is less consistent, and everyone understands the sun doesn't shine at night. The July illustration shows exactly why HGGS is needed. This also helps to explain the defining characteristics of peaking generation, and why CIPCO expects the plant to operate 15-20% of time.

The gap between current resources and the load curve represents our need and open exposure. CIPCO must maintain always-available resources to meet the needs of our members day and night, no matter what the weather, or the season. HGGS will be always available and "on call." HGGS will deliver on-peak energy, and dispatchable energy security for severe weather events, essential for delivering the dependable power Iowans deserve.

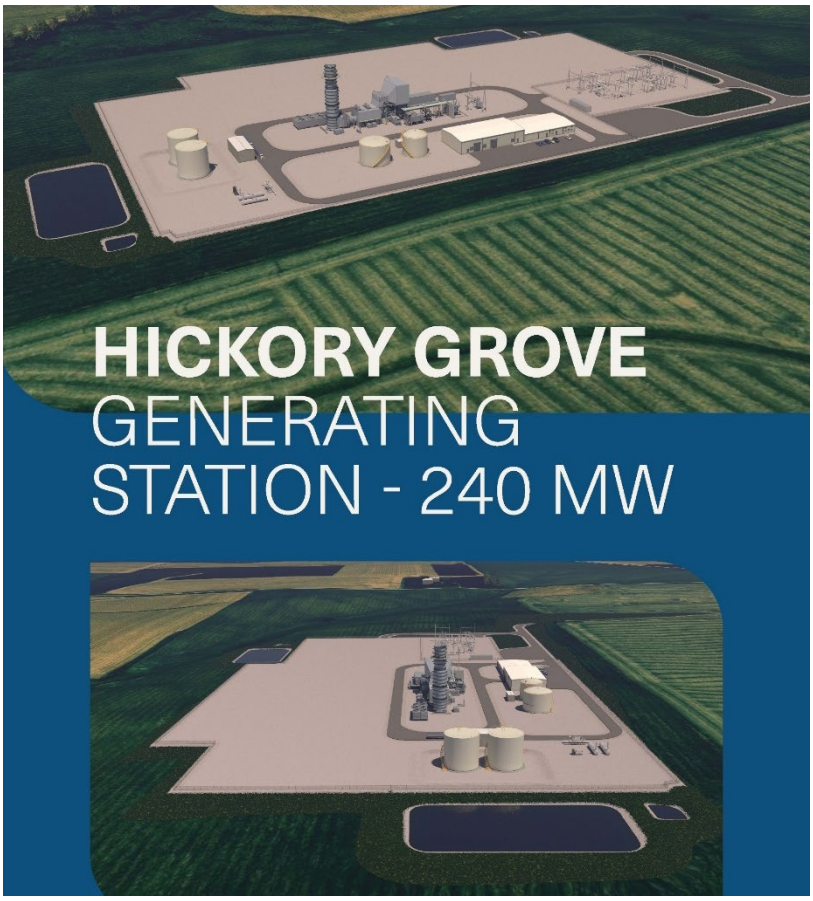
VIII. HICKORY GROVE GENERATING STATION

Project Overview

CIPCO will seek Iowa Utilities Commission (IUC) approval to site, construct, operate, and maintain the proposed Hickory Grove Generating Station, which will consist of one simple-cycle CT and auxiliary components having a nameplate generating capacity of up to 240 MW. All design capacity will be reserved for exclusive use by CIPCO.

The generating unit at the site will be one Siemens Energy SGT6-5000F simple-cycle CT generator. The primary fuel for the facility will be natural gas supplied via Northern Border Pipeline (NBPL). Fuel oil, delivered by truck and stored on site, will be utilized only as a secondary fuel.

HGGS will operate as a peaking power facility, with the CT operating in a cyclic manner, as necessary, to meet peak demands and add operational flexibility and reliability to CIPCO's generating fleet in periods when energy available from wind and solar resources is low.



ENERGY GENERATION

Natural gas is the **single-largest source of energy** used to generate electricity in the United States, making up 43% of electricity generation in 2023.*

24/7 RELIABLE ENERGY

Simple-cycle combustion turbines are **fast starting**, **flexible** and **reliable**. They feature fuel flexibility, ability to **complement renewables**, and fast startup time, offering proven, industry-leading performance.

LOCAL OPERATIONS

Approximately **five to seven permanent local jobs** will be created to operate the project. Approximately 200 additional temporary construction jobs will be required for initial construction.

Hickory Grove Generating Station

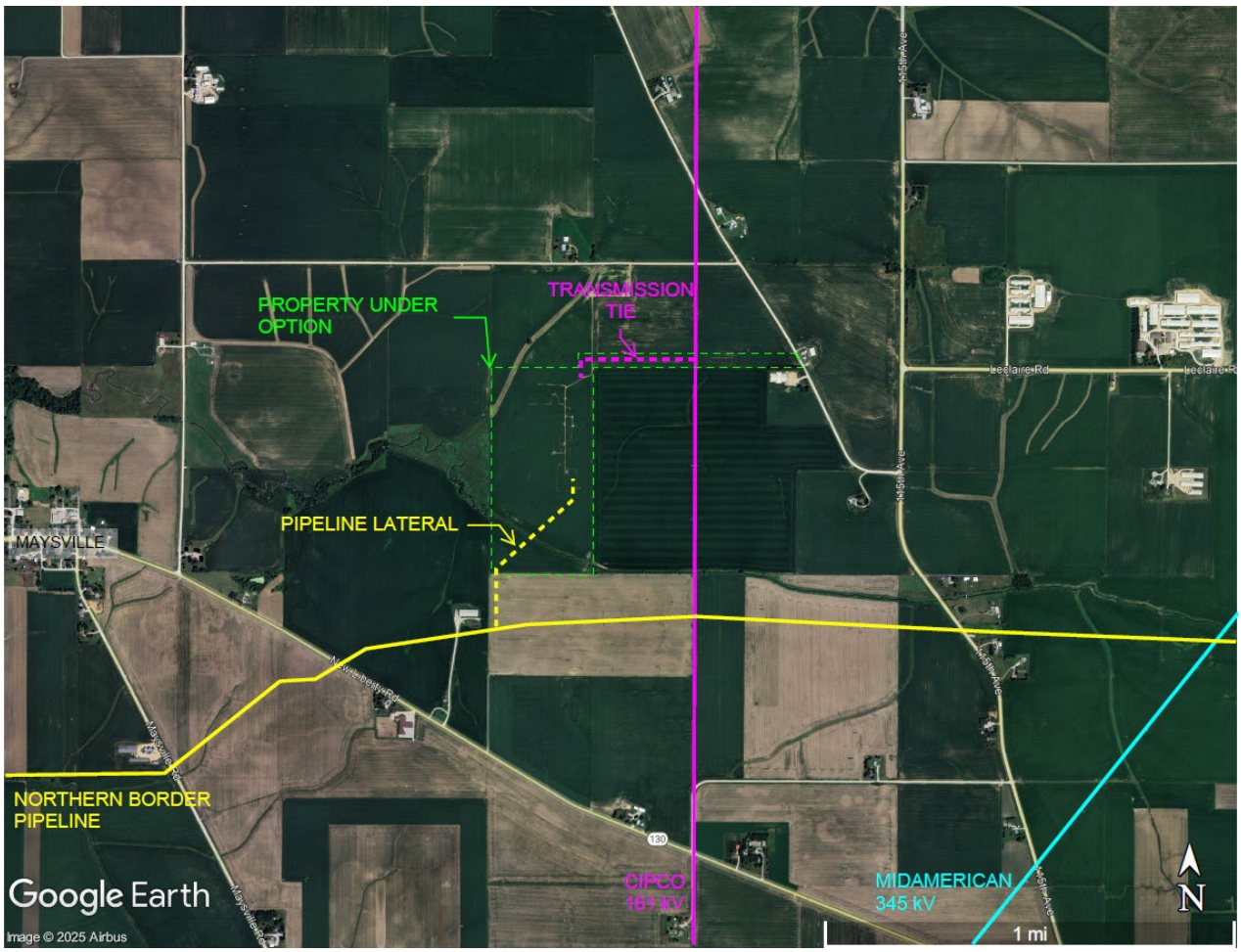
* Source: U.S. Energy Information Administration (eia.gov)

a. Site Selection

CIPCO has all necessary land rights for the project. These rights have been secured on a voluntary basis. The land CIPCO has under option totals 90 acres, however, the generating plant and transmission interconnection facilities will only use about 35 acres.

The Hickory Grove Township site east of Maysville, Iowa was selected because it represents the most practical and responsible location for a peaking generation facility. The site is appropriately set back from surrounding rural residences, is located in close proximity to the primary fuel source and adjacent to existing high-voltage transmission infrastructure owned by CIPCO. Siting HGGS at this location minimizes the need for significant pipeline and transmission extensions, thereby reducing impacts to agriculturally zoned land and limiting overall land-use.

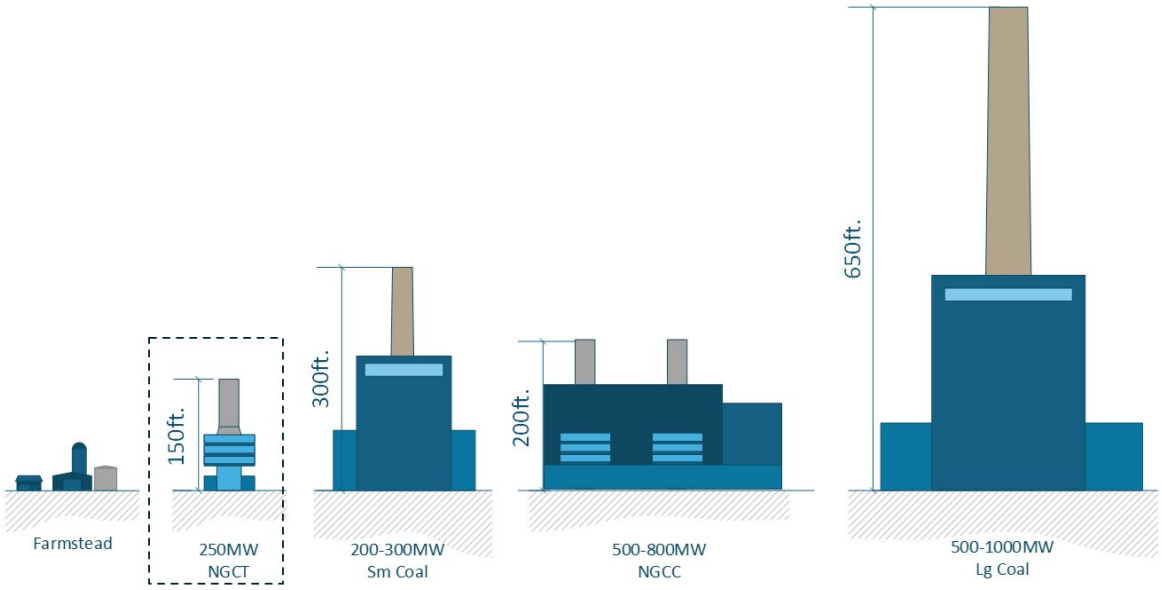
HGGS Site: Close proximity to the primary source of fuel and point of energy export.



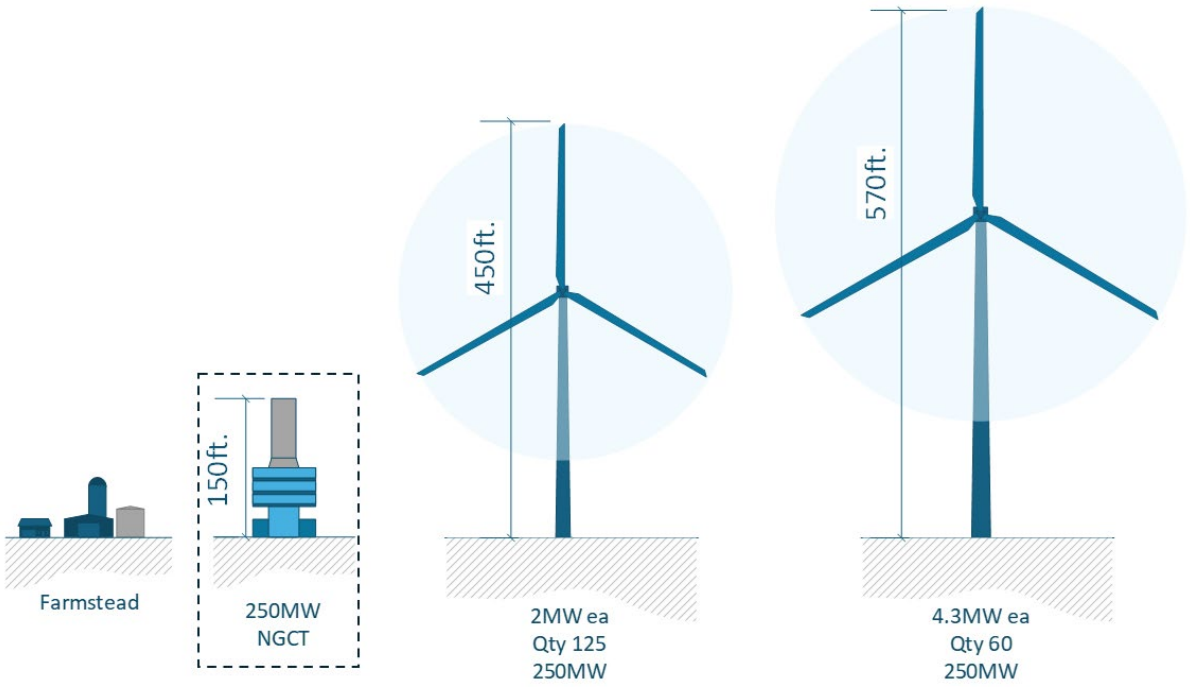
b. Project Visibility

HGGS, as a simple-cycle peaking generating facility is compact by nature, allowing for significant accredited capacity yet limiting land use and visibility compared to other generating facilities. In addition to a small project footprint, the project will reach a maximum of approximately 150 feet at the highest point, limiting the visual impact.

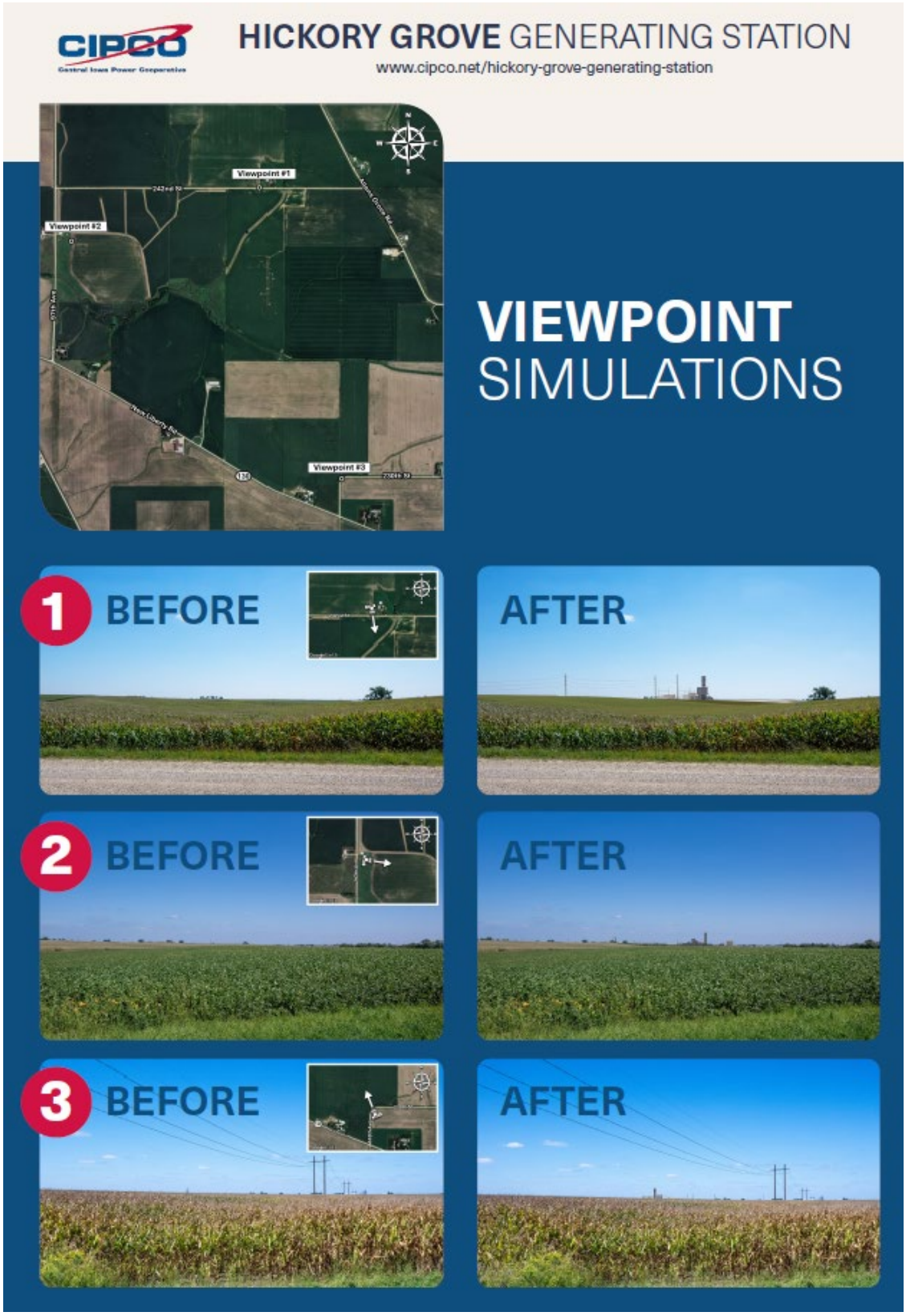
Size comparison to other thermal electric energy generating technologies:



Size comparison to modern wind turbine generators:



CIPCO has also provided viewpoint simulations of the proposed HGGS from various vantage points surrounding the project site:



c. Land Use

CIPCO has all necessary land rights for the project; all secured on a voluntary basis. Land under option totals approximately 90 acres.

The U.S. Farmland Protection Policy Act (FPPA) is intended to minimize the impact federal programs have on the unnecessary and irreversible conversion of farmland to nonagricultural uses. For the purpose of FPPA, farmland includes prime farmland, unique farmland, and land of statewide or local importance.

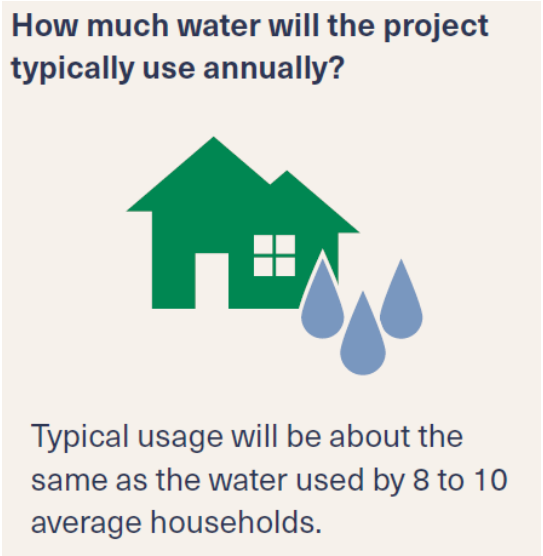
In accordance with the U.S. Department of Agriculture – Rural Development, the amount of Scott County farmland as defined in FPPA is 142,945 acres. Therefore, the HGGS site represents less than 0.063% of FFPA Farmland in Scott County.

d. Water

According to the U.S. Geological Survey (USGS), the project area overlies the Silurian-Devonian aquifers, which cover approximately 90 percent of Iowa and are also present in Wisconsin, Illinois, Indiana, and Ohio. In northeastern Iowa, the Silurian-Devonian aquifer is overlain by a surficial aquifer system.

Groundwater will be used for maintenance and operation, including for fire protection and potable needs. There will be no use of water from Hickory Creek.

A well will be installed on-site by a licensed contractor to supply the operational water needs of the facility. During construction and before well construction, potable water needs will be hauled in. It is anticipated that the maximum well water withdrawal rate would be 210 gallons per minute (gpm), with most operating scenarios being well below 210 gpm. A 500,000-gallon combined service water and fire water tank will be installed on-site that will be used to support operations and maintenance and provide fire protection. This tank will be filled periodically, as needed, from the on-site well.



Stormwater runoff from the site will be collected in detention ponds. Industrial wastewater will be minimal, but any such spoiled water will be collected and hauled offsite. Sanitary discharges will be through onsite septic fields. CIPCO will maintain all necessary state (NPDES) and county discharge permits (sanitary), as well as train onsite staff to respond to spill events through a site-specific Spill Prevention, Control, and Countermeasures plan compliant with 40 CFR 112. The earthen berm surrounding the diesel tanks is designed to hold the loss of an entire tank.

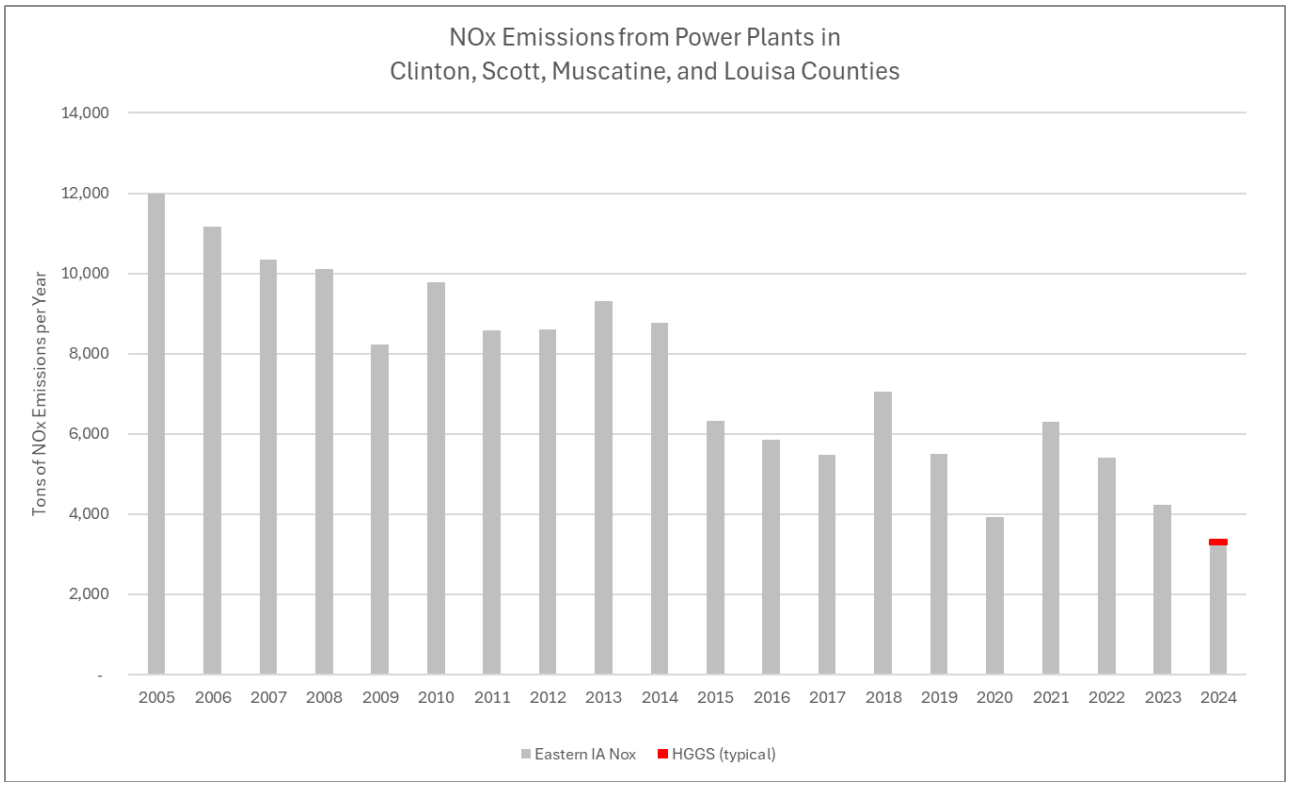
e. Emissions

We want our neighbors in Scott County to know that there are time-tested, robust technical permitting processes that will ensure HGGS does not cause the local air quality to exceed the U.S. Environmental Protection Agency's (EPA) ambient air health standards even during the most extreme, worst-case conditions. Not only is there a great deal of technical modeling done ahead of time, but there are also many checks that will be done on an ongoing basis to ensure those standards are continually met. CIPCO will dutifully comply with all federal and state regulations and processes that already exist to ensure the continued health of Scott County citizens.

The fact is that neither CIPCO nor anyone else is legally able to construct a power plant that doesn't meet emissions performance standards issued by the EPA, and which are updated (tightened) from time to time. These are called New Source Performance Standards (NSPS) and are similar to the EPA regulations that require new heavy-duty trucks to now use DEF fluid to control tailpipe NO_x emissions. In the grand scheme of things, this helps guarantee that as power plants are retired and replaced with new ones, air pollutants will continue to be reduced overall.

Unfortunately, some folks are misconstruing details found in a 2024 United States Government Accountability Office (GAO) report regarding peaking plant emissions and misapplying them to HGGS. The GAO report samples a very wide variety of power plant technologies, fuels, sizes, and vintages. Most notably, the study cites only the median emissions performance statistics from that broad dataset, which are attributable to power plants that are decades old. But due to the EPA's NSPS, HGGS will represent the cleanest technology appropriate for this peaking application, with lower emission rates than nearly every power plant considered in that GAO study.

For perspective, it might help to consider trends in regional power plant emissions over the past twenty years and compare it to what HGGS would have contributed had it been operating in the final year of that period. NO_x emissions from regional power plants have dropped by nearly 75% over the past twenty years. This is mostly driven by plant closures totaling approximately 400 MW of retired generating capacity. HGGS will bring back 240 MW of that capacity with a comparatively very small amount of NO_x emissions. This shows NSPS regulations working with real results.



CIPCO has contractual, must-make performance guarantees from the HGGS turbine manufacturer that the turbine will be able to meet or beat the New Source Performance emission standards. The Iowa Department of Natural Resources (IDNR) air permit will require CIPCO to hire a qualified third-party testing team to directly test emissions during commissioning to confirm standards are met. The IDNR will observe and audit the test procedure and review the test results to verify all data is correctly calculated. After commissioning, CIPCO will submit detailed emissions data to EPA and IDNR on an ongoing basis. The data is gathered from plant instrumentation, which again are routinely verified by IDNR and third-party testing services according to EPA quality assurance methods. Because real world emissions of HGGS will be independently verified and regulated by IDNR and EPA, Scott County neighbors can rest assured that HGGS' emissions performance will actually be what CIPCO claims it will be.

With that, it should be abundantly clear that emission concentrations from HGGS will be very low compared to older power plants, and the facility will perform to the EPA's latest, most stringent standards for combustion turbine technology. But what Scott County neighbors really want to know is whether HGGS is going to make their air unsafe to breathe inside their home, or when they're in their backyard with their kids, or when they're out walking their dog. The bottom line is that the IDNR will not allow HGGS to be built if it would cause local ground level air quality to degrade beyond the EPA's National Ambient Air Quality Standards (NAAQS) for pollutants like NO_x, SO_2, ozone, and particulate matter. This program is called Prevention of Significant Deterioration, or PSD.

CIPCO engaged a third-party consultant to conduct computer modeling of a 6 mi by 6 mi square land area centered on HGGS. It turns out that, even in the most severe plant operating scenario, with the toughest weather conditions at the worst point within that area, local ambient air conditions will not exceed the NAAQS. The locations of highest impact in the study (but still within guidelines) were found

at the modeled fenceline of the HGGS facility. Locations farther away from the plant will invariably experience lesser impact on air quality, and therefore the air quality at neighboring residences will also not experience a substantive degradation of air quality. We expect the IDNR to come to a similar conclusion when they analyze and model the local impacts of HGGS.

The IDNR currently maintains several ambient air quality monitoring stations in Scott County which continuously record ambient air data for a variety of pollutants. That data becomes publicly available on EPA websites. Anyone can go see an example of one of these monitoring stations in the southeast corner of Scott County Park on 270th St, just east of the Park View development, which will many times be downwind of HGGS. In the future, if IDNR believes HGGS is directly affecting Scott County's ability to maintain compliance with NAAQS, they can direct CIPCO to take appropriate measures to mitigate those effects.



For those that are concerned about climate change, HGGS is one key piece of a larger series of resource decisions by CIPCO. When taken as a whole, CIPCO's recent resource additions (including HGGS) are nearly 90% less carbon intense ($lbCO_2e/MWh$) than if served from an equivalent new coal plant. HGGS enables the continued incorporation of intermittent wind and solar based resources by acting as a reliability backstop, which is especially critical for when we see multiple consecutive days of weak wind and solar production like we just experienced with Winter storm Fern, discussed in detail later in this filing.

IX. INQUIRIES REGARDING REGIONAL ELECTRIC LOAD, GENERATION, AND NEED

Since the October 2025 public hearing on CIPCO's proposed zoning text amendment, CIPCO has received expanded requests from county officials seeking information related to county-wide electric load and regional electric generating resources. These inquiries are understandable given that Scott County is the third-most populous county in Iowa yet hosts no substantial electric generation. At present, there is less than 3 MW of installed electric generating capacity located within the county.

The county's requests regarding regional electric load and generation data extend beyond CIPCO's clear and well-documented need for additional generating capacity to serve its members, including electric cooperative members located in Scott County. While these inquiries fall outside the scope of the zoning text amendment currently under consideration by the Board of Supervisors, CIPCO remains committed to assisting Scott County in gathering and understanding relevant information to the extent possible.

The electric grid is a complex, highly interconnected regional system. Scott County is served by multiple public utilities, including Eastern Iowa Light & Power Cooperative and CIPCO as electric cooperatives; MidAmerican Energy and Alliant Energy as investor-owned utilities; and several municipal electric utilities. These utilities are regulated by the Iowa Utilities Commission (IUC), which is charged with administering the Iowa General Assembly's directive to regulate the development of electric generating and transmission facilities in sufficient quantity to ensure reliable electric service for Iowa consumers.

In addition, Scott County—and much of Iowa and Illinois—lies within the MISO region. MISO was established pursuant to approval by the Federal Energy Regulatory Commission (FERC) and is responsible for ensuring regional resource adequacy, operating the regional transmission system, and administering wholesale electricity markets. MISO does not own generation or transmission assets; rather, it functions as a system operator—similar to an air traffic controller—coordinating the reliable flow of electricity among utilities and ensuring supply and demand are balanced on a continuous, real-time basis. A clear understanding of the respective roles and responsibilities of these regulatory entities is essential when evaluating local and regional electric generation resources.

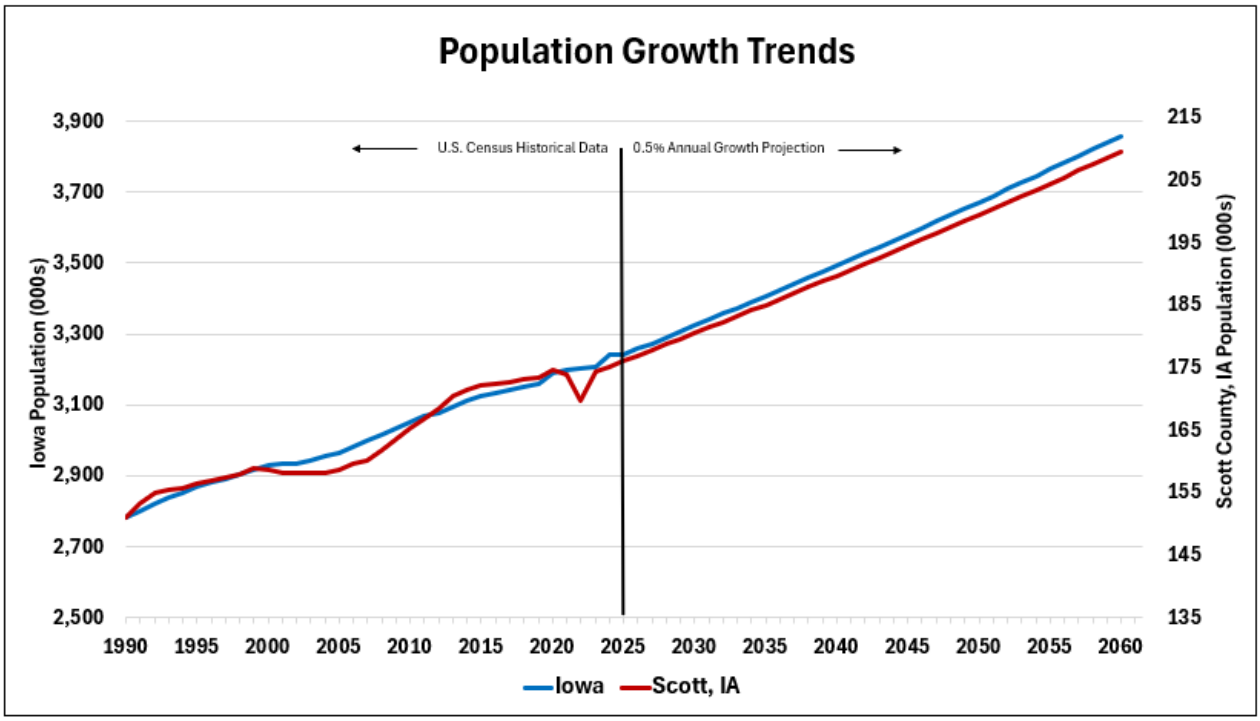
While electric load data is compiled and reported at the state level, to CIPCO's knowledge, comprehensive and publicly available electric load data on a county-by-county basis is not publicly available. Each electric utility is responsible for planning and operating its own system and maintaining its own load data. To obtain accurate, verifiable, and comprehensive information for Scott County as a whole—and for the broader surrounding region in both Iowa and Illinois—the county would need to coordinate with all serving utilities, establish consistent parameters, and make formal data requests in support of its analysis.

With the above clarity and limitations considered, CIPCO provides the following information for the Board of Supervisors' consideration.

a. Population Growth

Electric consumption is driven by residential, agricultural, commercial, and industrial activity. Historically, population growth has been closely correlated with increases in electricity consumption. In recent years, however, continued electrification of the U.S. economy has caused electric demand to grow at a faster rate than population.

Based on data from the U.S. Census Bureau, Scott County's population growth from 1990 through 2025 has closely mirrored that of the State of Iowa, averaging approximately 0.5% annually. Assuming population growth continues at a rate of at least 0.5% per year, both population and associated electricity consumption are expected to continue increasing over time.



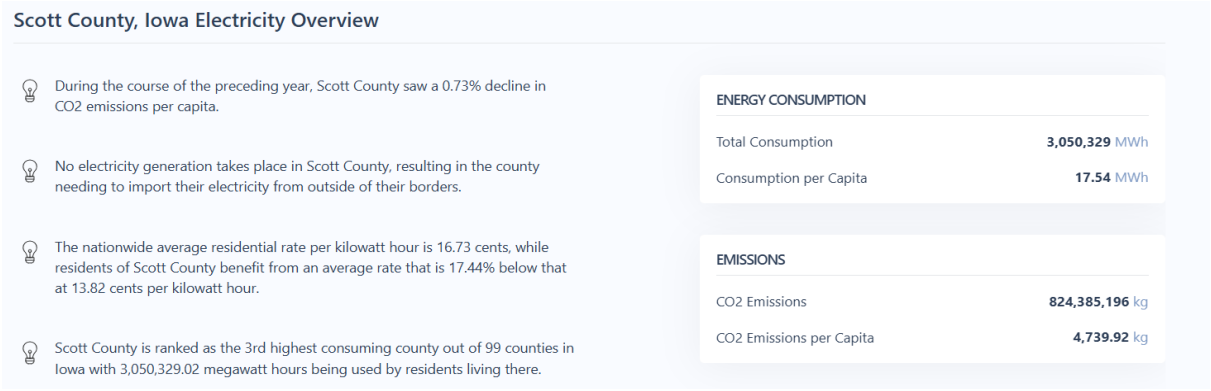
Source: U.S. Census Bureau

Population growth is a well-established driver of increased electricity demand. Considering population trends alone, the case for investing in additional electric generation resources is compelling.

b. Electricity Consumption Trends

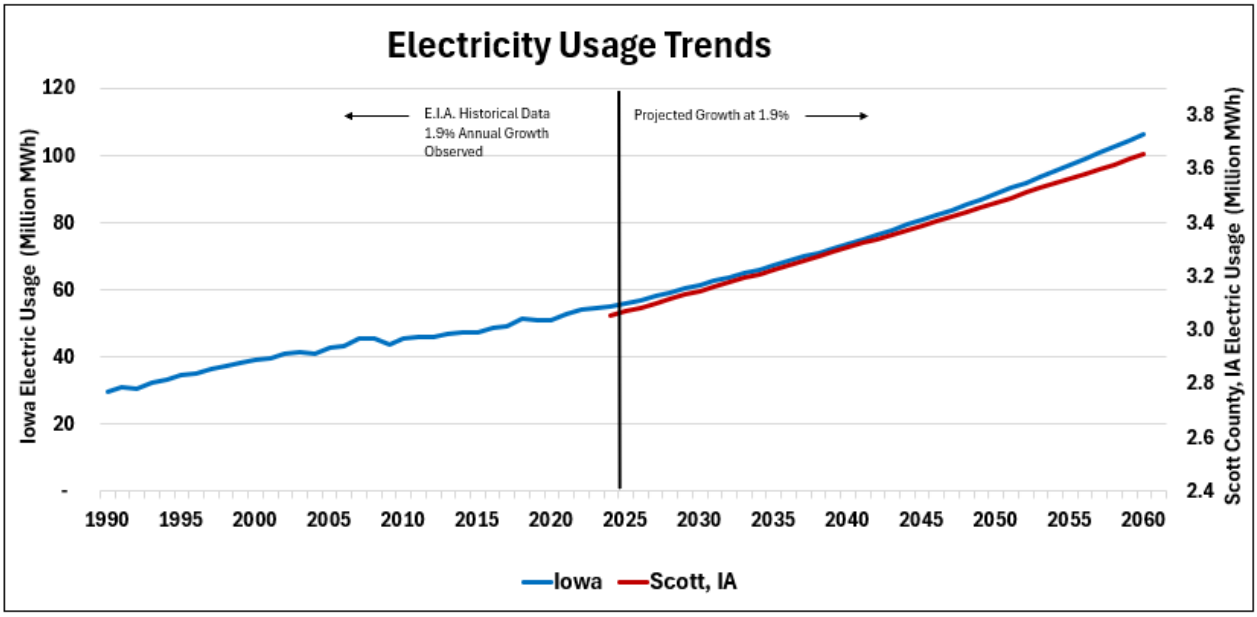
The U.S. Energy Information Administration (EIA) compiles and reports electricity consumption data at the state level. As illustrated in the chart below, Iowa's electricity consumption grew at an average annual rate of 1.9% from 1990 through 2024. Dividing total statewide consumption by Iowa's population indicates that per capita electricity usage was approximately 16.95 MWh in 2024.

To the best of CIPCO's knowledge, county-level electricity consumption data is not reported by governmental sources or regulatory authorities. However, according to estimates published by FindEnergy.com, Scott County's total electricity consumption was approximately 3,050,329 MWh in 2024.



Source: https://findenergy.com/ia/scott-county-electricity/

CIPCO cannot verify the accuracy of the information from FindEnergy.com and provides it solely for the Scott County Board of Supervisors' consideration. However, as a reasonable check, dividing the reported total consumption by Scott County's population indicates per capita electricity use of approximately 17.54 MWh in 2024. This is slightly higher than the statewide average of 16.95 MWh, which is plausible given the industrial and manufacturing activity in the Quad Cities region.



Source: Historical Data obtained from U.S. Energy Information Administration

This analysis is further evidence that electricity consumption has grown at a faster rate than population, providing further evidence of the need and necessity to invest in incremental sources of electric generation.

c. Regional Electric Generating Resources

County officials have requested that CIPCO provide information regarding electric generation resources in and around Scott County. Although Scott County is among Iowa's largest counties and has a substantial industrial base, it only hosts approximately 3 MW of electric generating capacity. As a result, the county is highly dependent on electricity generated outside its borders and delivered via regional transmission and distribution networks. The illustration and accompanying table below identify electric generating resources located within Scott County and within a 40 to 50-mile radius of Davenport, Iowa.



Source: U.S. Department of Energy (DOE) Energy Data Catalog

Plant Name	Utility Name	Sector Name	City	County	State	Fuel Source	Technology	Net Capacity (MW)	Age (Years)
Davenport Water Pollution Control	City of Davenport	Commercial CHP	Davenport	Scott	Iowa	Biomass	Other Waste Biomass	2	
AgriReNew	AgriReNew	IPP CHP	Stockton	Scott	Iowa	Biomass	Other Waste Biomass	1	
Louisa Generating Station	MidAmerican Energy/CIPCO	Electric Utility	Muscatine	Louisa	Iowa	Coal	Conventional Steam Coal	746	43
Muscatine Power Plant	City of Muscatine	Electric Utility	Muscatine	Muscatine	Iowa	Coal	Conventional Steam Coal	249	57
Cordova Energy	Cordova Energy Co LLC	IPP Non-CHP	Cordova	Rock Island	Illinois	Natural gas	Natural Gas Combined Cycle	521	25
Moline	MidAmerican Energy	Electric Utility	Moline	Rock Island	Illinois	Natural gas	Natural Gas Combustion Turbine	60	56
Geneseo	City of Geneseo	Electric Utility	Geneseo	Henry	Illinois	Natural gas	Natural Gas Combustion Engine	20	49
Quad Cities Generating Station	Constellation/MidAmerican Energy	IPP Non-CHP	Cordova	Rock Island	Illinois	Nuclear	Nuclear	1,819	54
Wilton	City of Wilton/CIPCO	Electric Utility	Wilton	Muscatine	Iowa	Petroleum	Petroleum Liquids	9	22
Durant	City of Durant/CIPCO	Electric Utility	Durant	Cedar	Iowa	Petroleum	Petroleum Liquids	4	30
Wapello Solar LLC	CIPCO	IPP Non-CHP	Wapello	Louisa	Iowa	Solar	Solar Photovoltaic	100	5
Eastern Iowa Solar	CIPCO	Electric Utility	Wilton	Muscatine	Iowa	Solar	Solar Photovoltaic	2	10
Bishop Hill Energy LLC	SunEdison LLC	IPP Non-CHP	Cambridge	Henry	Illinois	Wind	Onshore Wind Turbine	200	14
Bishop Hill II Wind Farm	Bishop Hill Energy II, LLC	IPP Non-CHP	Cambridge	Henry	Illinois	Wind	Onshore Wind Turbine	81	14
Bishop Hill III	Invenergy Services LLC	IPP Non-CHP	Cambridge	Henry	Illinois	Wind	Onshore Wind Turbine	119	8

Source: U.S. Department of Energy (DOE) Energy Data Catalog

Notes:

- *Excludes Illinois small solar sites owned and operated by independent power producers that provide limited regional grid contribution, if any.*
- *Excludes Illinois small municipal-owned hydro and biomass generation <2 MW.*
- *Excludes IA and IL municipal-owned petroleum fueled municipal emergency generation.*
- *Includes Wilton and Durant, IA municipal-owned petroleum fueled emergency generation given Wilton and Durant are part of the CIPCO membership, capacity is near Scott County and dispatched by CIPCO.*

When examining regional electric generation, it becomes clear that relatively few resources providing reliable, dispatchable power are not weather-dependent. In Iowa, these include the Louisa Generating Station (conventional coal), discussed further below, and the Muscatine Power Plant (conventional coal), which is owned and operated by Muscatine Power & Water. In western Illinois, the main dispatchable resources are the Quad Cities Clean Energy Center (nuclear) and the Cordova Energy Power Station (natural gas), also discussed in detail below.

Louisa Generating Station is a conventional coal-fired steam electric generation facility that first entered service in 1983 and has operated safely and efficiently for more than 40 years. The plant is operated by MidAmerican Energy, which holds an 88% ownership interest. The remaining ownership interests are held by CIPCO (4.6%), Alliant Energy (4%), and several municipal electric utilities—including the cities of Eldridge, Tipton, and Geneseo—which collectively own approximately 3.4% of the facility. Louisa operates within the MISO footprint and provides energy and capacity to the regional grid serving Iowa and Illinois.

Quad Cities Generating Station, now named Quad Cities Clean Energy Center (QCCEC) is a two-unit boiling water reactor nuclear power plant located on approximately 765 acres near Cordova, Illinois, along the Mississippi River. The facility is 75% owned and operated by Constellation Energy, with MidAmerican Energy holding the remaining 25% ownership interest. QCCEC operates within the PJM Interconnection footprint, which encompasses northern Illinois and extends westward to the plant site. MidAmerican's ownership share is scheduled into MISO as an import and is treated as a Border External Resource for purposes of MISO's resource adequacy requirements.

QCCEC entered commercial operation in 1973. In 2004, the U.S. Nuclear Regulatory Commission (NRC) approved a 20-year license extension for both reactors, authorizing operations through 2032. In June 2016, Constellation announced its intention to retire QCCEC in 2018, citing economic challenges and the absence of state policy support. However, in December 2016, Constellation reversed that decision following passage of the Illinois Future Energy Jobs Act, which established six years of zero-emission credits (ZECs) intended to support continued operation of qualifying nuclear facilities. In 2021, the Illinois Climate and Equitable Jobs Act (CEJA) replaced the ZEC program with broader policy measures and further reinforced the role of existing nuclear generation in the state's energy mix, with a particular emphasis on reliability.

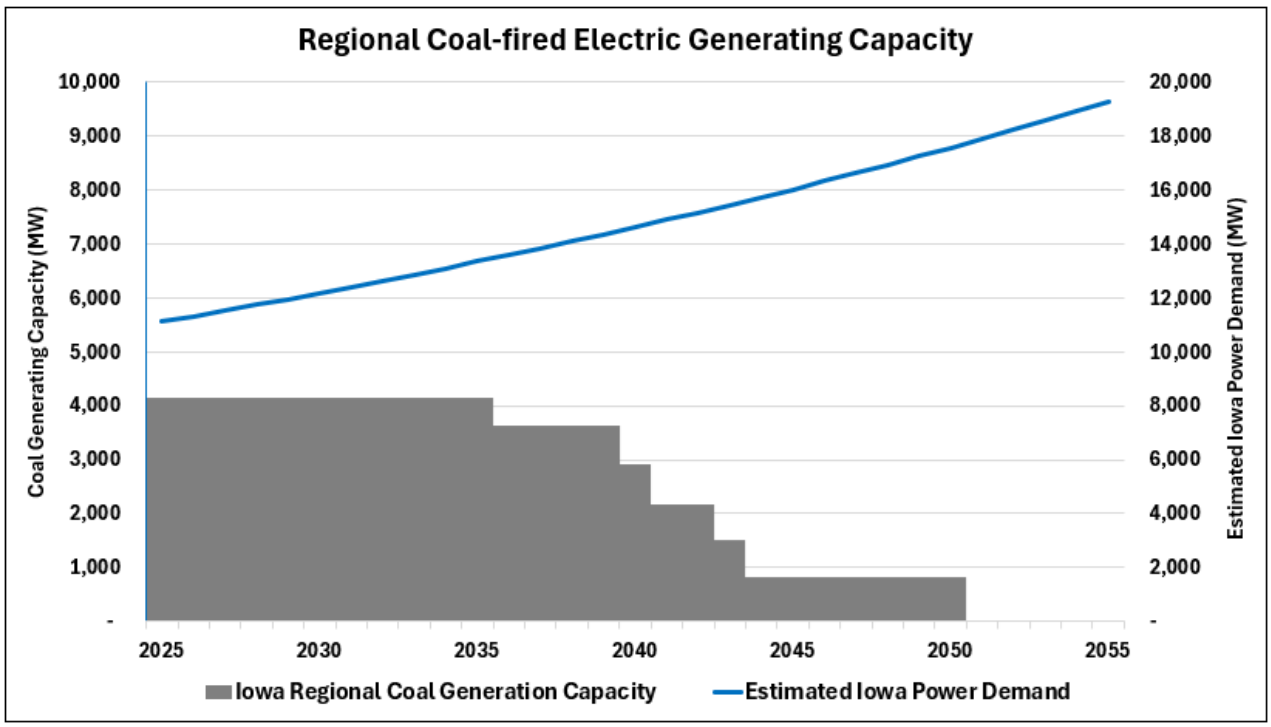
Although no subsequent license renewal application has yet been filed with the NRC, it is reasonable to anticipate that Constellation may pursue a second license extension to allow continued operation beyond 2032. Under such an extension, the facility would operate for up to 80 years, through approximately 2052.

Cordova Energy Power Station is a combined-cycle natural gas-fired generating facility located in Cordova, Illinois, and owned by Berkshire Hathaway Energy. The plant began commercial operations in 2001, is interconnected to the Commonwealth Edison (ComEd) transmission system, and sells its output into the PJM wholesale market.

d. Aging Coal Generating Units

County officials specifically requested information regarding Iowa's coal-fired electric generating facilities, which continue to provide a significant share of the state's energy production and baseload generating capacity. Although this information has been provided previously, it is summarized again here for completeness.

The chart below identifies all major coal-fired power plants in Iowa, along with anticipated retirement dates as publicly stated by the respective owners and operators. The Louisa Generating Station is majority owned and operated by MidAmerican Energy; however, CIPCO is also a joint owner, and a portion of the facility's energy and capacity is included in CIPCO's resource portfolio. MidAmerican Energy has modeled an anticipated retirement date for Louisa in 2040.



Coal-fired generating resources in Iowa remain critical to grid reliability and electric affordability, and their contribution cannot be overstated. As electricity consumption continues to increase and significant coal retirements approach, additional generating resources will be necessary to ensure utilities can continue to meet public demand—both today and as load growth accelerates in the future. Accordingly, it is essential that regulators align public policy, zoning, and regulatory frameworks to support the timely development of new generation, ensuring reliable and affordable electricity not only in the near term, but for future generations.

Effective planning requires that generation development occurs well in advance of any reliability shortfall. New generating assets typically require a minimum of three to five years to plan, permit, procure long-lead equipment, construct, and commission. Waiting to act until a reliability concern materializes risks unacceptable consequences for customers and the regional economy.

Rising residential and agricultural electricity usage, continued economic development, and rapid technological advancement are driving demand for reliable power at a pace not seen in recent decades. These trends are placing increasing pressure on Iowa's electric utilities to deliver dependable service. As a result, continued investment by CIPCO and other Iowa utilities in electric generation infrastructure is imperative. While existing generation resources have delivered reliable service for decades, many are aging and, on their own, will be insufficient to meet the demands of tomorrow's electric system.

X. REGIONAL RELIABILITY ASSESSMENT

The largest risk facing the electric grid is the fact that demand for reliable power continues to grow, but supply is not keeping up. The reality is this; ensuring a safe, reliable, and cost-effective supply of electricity is getting more challenging every day and long-term trends are getting worse. We strongly encourage the Board of Supervisors and its professional county staff to research the significant body of evidence from regulatory authorities on the growing risks in the Midwest region, and across our nation.

For example, the North American Electric Reliably Corporation (NERC), recently published its 2025 Long-term Reliability Assessment. This report is available at: https://www.nerc.com/globalassets/our-work/assessments/nerc_ltra_2025.pdf. NERC's assessment provides an independent 10-year outlook (2026–2035) on the reliability of the North American bulk power system. The overall resource adequacy outlook is worsening.

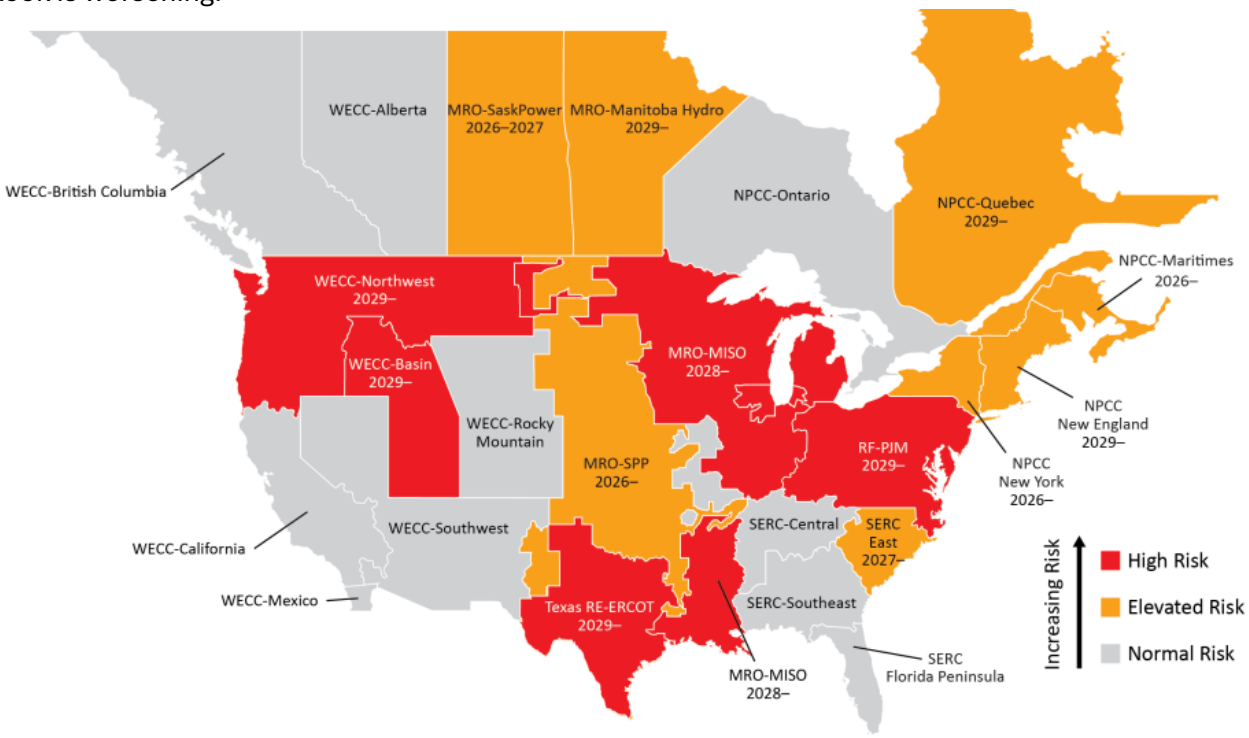


Figure 1: Risk Area Summary 2026–2030
Shows highest risk classification that occurs in the first 5 years and states initial year of occurrence

Source: North American Electric Reliably Corporation (NERC), 2025 Long-term Reliability Assessment

Scott County, and much of Iowa, Illinois, Minnesota, and Wisconsin fall within the MISO region. NERC's reliability assessment categorizes the region as facing **HIGH RISK of energy supply shortfalls within the next five years**. This means that under NERC's reference assumptions, the balance of resources to demand may fall below reliability targets within the assessment period. Resource adequacy concerns in MISO stem

from the projected rapid load growth outpacing new capacity additions. While utilities are planning to add new sources of generation, delays in development, permitting, and interconnection mean that resource growth may not keep pace with the rising demand within the forecast horizon.

Across all regions, NERC emphasizes that generator retirements, lagging new resource development, and shifting load characteristics (e.g., winter electrification and data center growth) combine to tighten reliability margins. The report advocates early planning, timely resource additions with reliability attributes, and improvements in transmission and grid flexibility to address emerging challenges.

This new assessment is yet another stark warning about the intensifying reliability risks facing America's electric grid. The report clearly highlights the need for smart, swift actions and serious conversations about how we will meet tomorrow's energy needs.

XI. WINTER STORM FERN

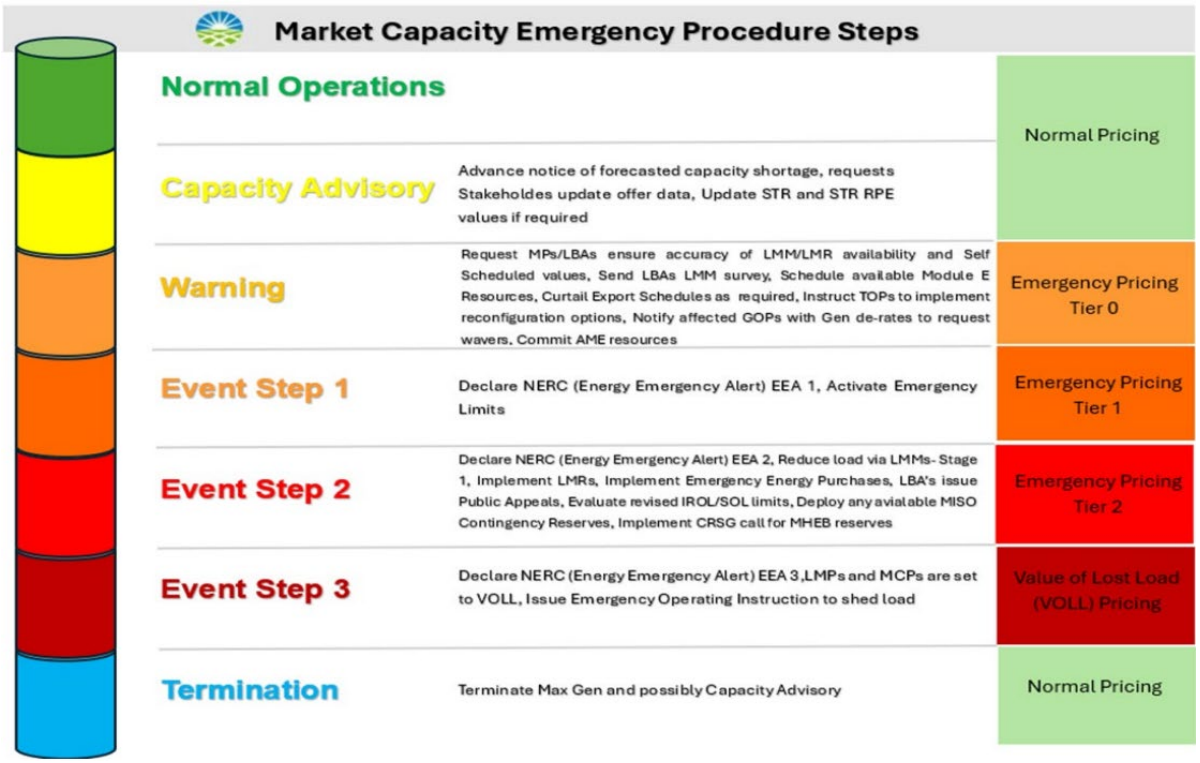
Winter Storm Fern affected a substantial portion of the United States beginning on January 24, 2026, with impacts extending for more than a week. The storm placed significant stress on regional electric grids and wholesale electricity markets, providing recent and compelling evidence of growing winter reliability and affordability risks driven by tightening capacity reserves and the grid's vulnerability when supply and demand become closely balanced.

Although ambient temperatures in Iowa did not reach historic lows, the arctic air mass extended deep into the southern and eastern United States, sharply increasing electricity demand across multiple regions and pushing the grid to its operational limits. Within the MISO footprint, the event demonstrated how cold conditions can rapidly elevate electric demand, increase reliance on dispatchable fuel-secure resources, drive fuel and electricity prices sharply higher, and expose transmission constraints that result in localized price spikes.

a. MISO Energy Emergency

During the overnight and early morning hours of Saturday, January 24, 2026, MISO initiated emergency operating procedures and directed all available generation resources to operate. System conditions escalated to a *Maximum Generation Event,* reflecting the need to deploy the full available generating fleet to meet demand. MISO subsequently declared an Energy Emergency Alert (EEA) Level 2, indicating critically high operating reserves and signaling an increased risk of further deterioration in system conditions. An escalation to EEA level 3 could have required the issuance of emergency operating instructions directing load-serving electric utilities to implement firm load shedding through controlled outages to preserve system stability and prevent widespread or cascading grid failures.

The illustration below outlines MISO's emergency procedure steps and the severity of the situation on January 24, 2026.



Source: misoenergy.org

The severity of the energy emergency caused by Winter Storm Fern should not be dismissed. In the MISO Central/North regions, there have only been five EEA 2 events over the last sixteen years, with all five events happening in the last eight years. The increased frequency of grid straining events is concerning.

The most notable grid emergency occurred during Winter Storm Uri in February 2021. Parts of Iowa did experience brief rolling outages but avoided severe disruptions. However, blackouts in Texas impacted more than 4 million customers and contributed to significant humanitarian impacts including loss of heating, water system failures, and hundreds of fatalities, as reported by state authorities.

b. Public Appeals for Conservation

On January 24, 2026, regional electric utilities—including CIPCO, Eastern Iowa Light & Power Cooperative, MidAmerican Energy, Ameren Illinois, Dairyland Power Cooperative, and others—implemented established emergency operating protocols as system conditions escalated. Utilities issued public appeals requesting energy conservation to help preserve grid reliability. Once system conditions improved and MISO de-escalated the emergency, utilities notified the public accordingly. Representative notifications are provided below.

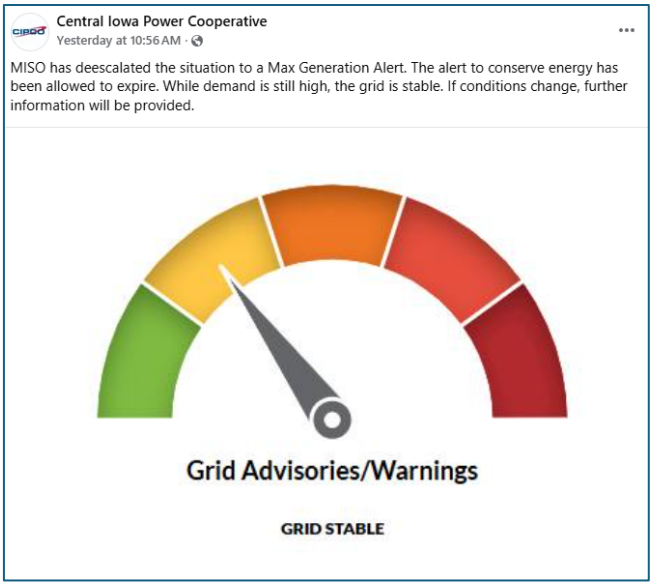
Central Iowa Power Cooperative
Yesterday at 5:45 AM ·

Due to lack of available generation, higher demand for electricity, and the cold weather conditions Midcontinent Independent System Operator (MISO) who oversees and manages the electrical grid system in our area has issued a public appeal for member-consumers to conserve energy until 10:00am Saturday morning.



Central Iowa Power Cooperative
Yesterday at 10:56 AM ·

MISO has deescalated the situation to a Max Generation Alert. The alert to conserve energy has been allowed to expire. While demand is still high, the grid is stable. If conditions change, further information will be provided.



Eastern Iowa Light & Power Cooperative
Yesterday at 7:19 AM ·

A peak alert has been issued for Saturday, Jan. 24. Eastern Iowa REC is asking members to voluntarily conserve energy until 10 a.m. Due to the cold weather conditions, higher demand for electricity and lack of available generation, the Midcontinent Independent System Operator (MISO) who oversees and manages the electrical grid system in our area has issued a public appeal for member consumers to conserve energy.

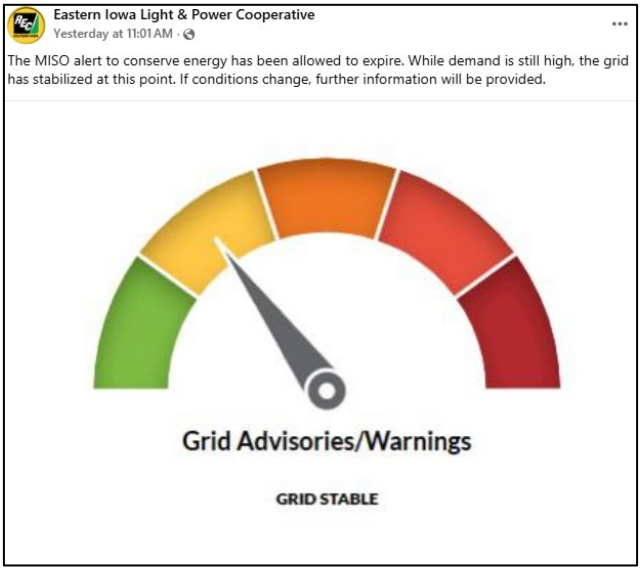
Eastern Iowa REC members are asked to adjust their thermostats a few degrees lower, around 68 degrees and avoid using large appliances, like dishwashers and electric washers and dryers, until after 10 a.m. today.

Eastern Iowa REC takes the responsibility to provide energy to our members very seriously, and we are making this request only after exhausting all other options.



Eastern Iowa Light & Power Cooperative
Yesterday at 11:01 AM ·

The MISO alert to conserve energy has been allowed to expire. While demand is still high, the grid has stabilized at this point. If conditions change, further information will be provided.



MidAmerican Energy
39m ·

MidAmerican has issued a PEAK ALERT – please help conserve electricity from now through 10 a.m. by lowering your thermostat and avoiding use of large appliances like washers and dryers. This is due to a winter storm impacting the regional electric grid far south of MidAmerican's service area, ultimately affecting the entire regional grid.

Reducing the demand for electricity will limit strain on our regional electric grid, help keep your energy bill low and prevent service interruptions. Thank you for understanding!

Learn more: https://bit.ly/3dkANKA



MidAmerican Energy
Yesterday at 6:20 AM ·

9 a.m. UPDATE: There is not a special need to conserve energy. MidAmerican's system remains stable and reliable. The regional grid operator called for voluntary and temporary electricity conservation due to the winter storm far to the south and later clarified the request was UNNECESSARY. Thank you for your cooperation!

THE FOLLOWING MESSAGE SHARED AT 6 A.M. IS NO LONGER IN EFFECT:
Please help conserve electricity from now through 10 a.m. by lowering your thermostat and avoiding use of large appliances like washers and dryers. This is due to a winter storm impacting the regional electric grid far south of MidAmerican's service area, ultimately affecting the entire regional grid.

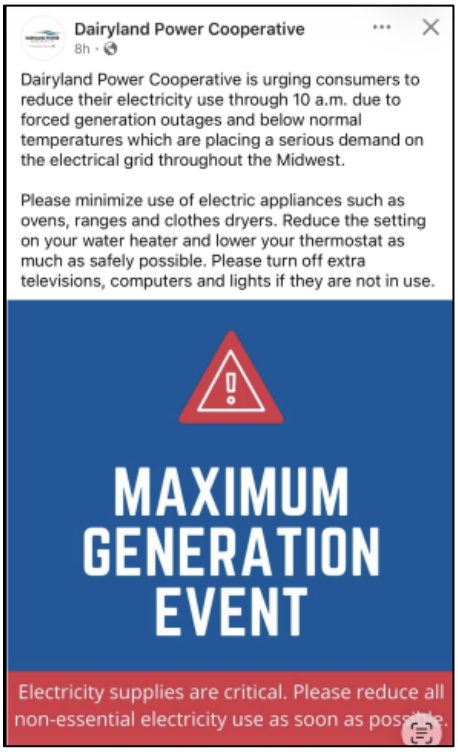
Reducing the demand for electricity will limit strain on our regional electric grid, help keep your energy bill low and prevent service interruptions. Thank you for understanding!

MIDAMERICAN ENERGY COMPANY®

Dairyland Power Cooperative
8h ·

Dairyland Power Cooperative is urging consumers to reduce their electricity use through 10 a.m. due to forced generation outages and below normal temperatures which are placing a serious demand on the electrical grid throughout the Midwest.

Please minimize use of electric appliances such as ovens, ranges and clothes dryers. Reduce the setting on your water heater and lower your thermostat as much as safely possible. Please turn off extra televisions, computers and lights if they are not in use.



US National Weather ... · Follow
10h ·

We wanted to share a recent press release from Ameren this morning. Considering the cold and higher energy usage, the grid is taking on a higher load, resulting in greater potential for outages. Please read and conserve energy the best you can. https://ameren.mediaroom.com/2026-01-24-Regional-grid-operator-calls-for-customers-to-reduce-energy-usage #mowx #ilwx #stlwx

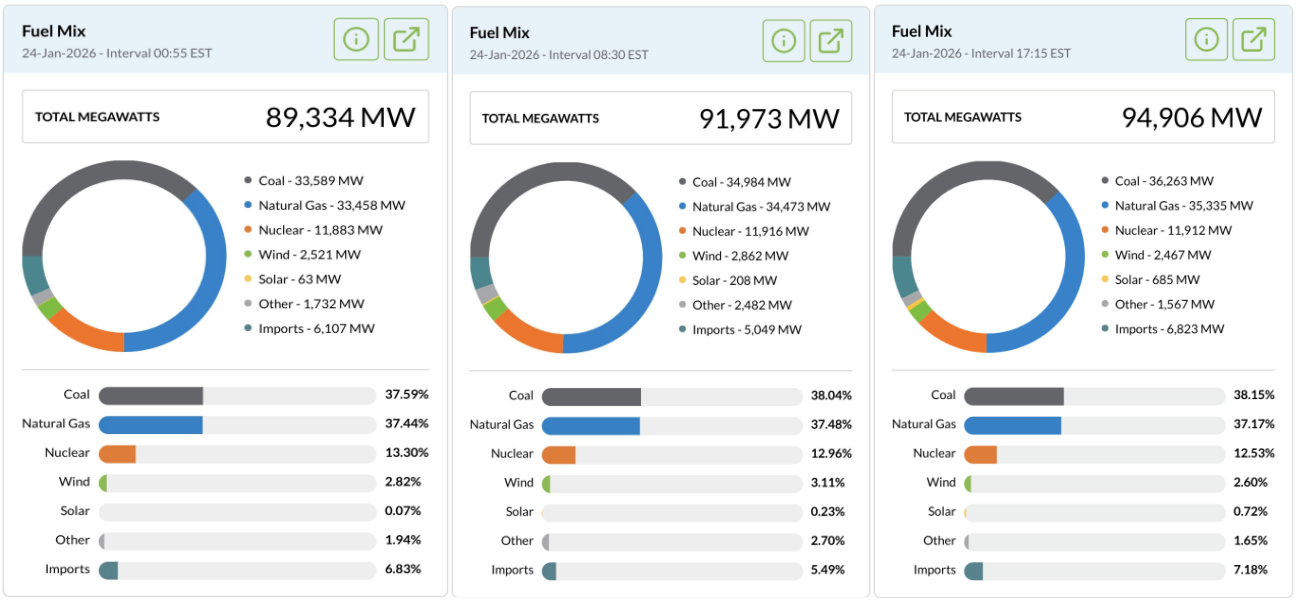
Ameren

ameren.mediaroom.com
Regional grid operator calls for customers to reduce energy usage

c. Winter Storm Fern Demonstrates the Need for Peaking Thermal Electric Energy Generation

Winter Storm Fern demonstrated the critical importance of always-available peaking generation, particularly thermal electric energy generating facilities supported by firm or dual-fuel supply, and appropriate winterization. Dispatchable regional generation resources were essential to meeting demand and maintaining system stability throughout the event.

Wind generation output was minimal, underscoring the challenges associated with relying on weather-dependent and variable generation during severe winter conditions, especially in the absence of sufficient fuel-flexible backup resources. For reference, the composition of the MISO system-wide generation mix on January 24, 2026, is provided below:



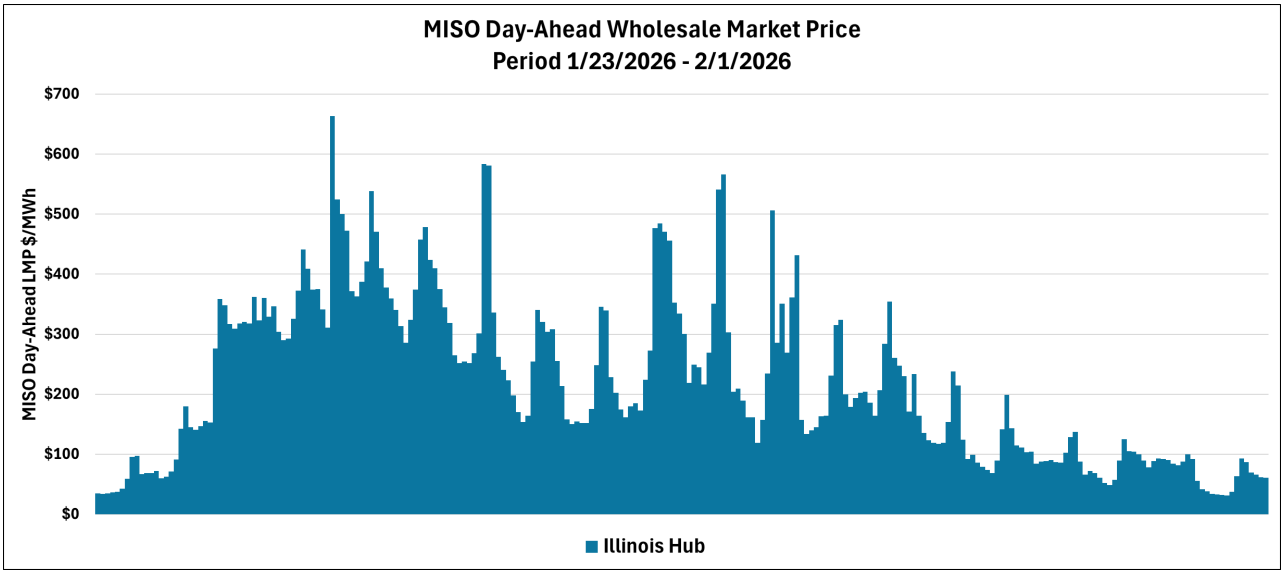
d. Economic Impact – Surging Wholesale Energy Prices

The frigid conditions during Winter Storm Fern drove wholesale electricity prices sharply higher as system demand surged and available generation resources were dispatched to their operational limits. Events such as Winter Storm Fern underscore the necessity for local electric utilities to maintain adequate, dependable sources of peaking thermal electric energy generation capable of serving load under all weather conditions. While regional energy markets promote efficient utilization of generation across a broad footprint, heavy reliance on imports during constrained conditions exposes local consumers to price volatility and elevated costs.

Beginning on Friday, January 23, 2026, and continuing through the following week, wholesale electricity prices across the MISO footprint increased to levels not observed in several years. During the coldest intervals, wind and solar generation contributed minimally, further tightening supply conditions. As a result, MISO pricing hubs cleared energy prices in excess of **$500 per MWh**, more than ten times typical market levels.

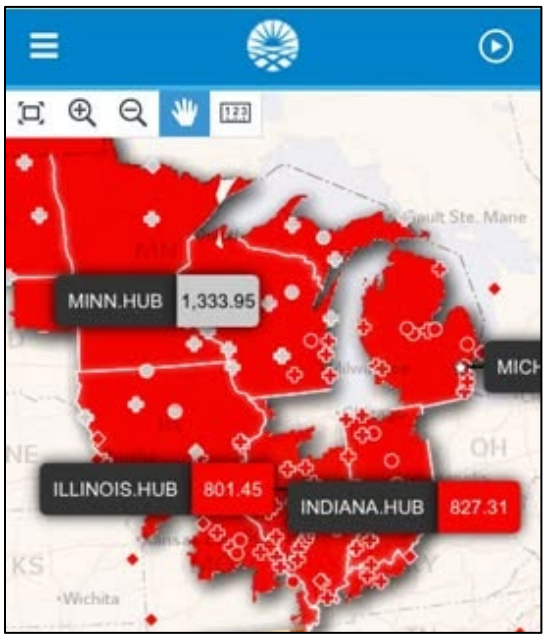
For context, an energy price of $500/MWh is equivalent to approximately **$0.50 per kilowatt-hour (kWh)** and reflects only the marginal cost of producing electricity which is ultimately borne by customers in

addition to energy market costs. These prices do not include the fixed costs associated with generation ownership, transmission, distribution, or utility operations.



Source: misoenergy.org

Severe real-time price volatility also occurred as the system struggled to balance generation and load across the region. For example, real-time wholesale electricity prices at the Minnesota hub briefly approached **$1,350 per MWh**. Such locational price divergence is common during periods of system stress and can result from a combination of factors, including transmission congestion, generator outages or derates, and localized supply constraints that limit the ability to move lower-cost generation to higher-demand areas.



Source: misoenergy.org

XII. SCOTT COUNTY REQUESTS RELATING TO ALTERNATIVE AND BROWNFIELD SITES

Following the October 2025 action by the Scott County Board of Supervisors to table the application to create a thermal electric energy generation facility special use permit, CIPCO fielded inquiries as to specific locations that could be considered as an alternative to Hickory Grove. Below is an overview of those locations and reasoning for why those sites are not reasonable alternative locations for a 240 MW natural gas generation facility.

a. Fair Station – Montpelier, IA (Muscatine County)

The Fair Station Generation Facility was a CIPCO-owned coal generation site capable of producing 66 MW of electricity at its peak capacity. First constructed in the 1960s, the facility closed in 2013 after the plant became uneconomical due to various reasons including environmental regulations and poor efficiency. While CIPCO proudly operated the facility, the Board of Directors determined it would be necessary to cease operations and make investments in more efficient and lower emission generation. CIPCO is not opposed to repowering coal facilities to more efficient technologies. In fact, CIPCO determined that retrofitting coal generators at our Summit Lake facility near Creston, Iowa would be economical and beneficial to the co-op's membership. Completed in 2021, Summit Lake is now capable of producing 110 MW.

While not an exhaustive list, below are some of the reasons that Fair Station remains impractical to repower as the site of CIPCO's proposed 240 MW natural gas fired power plant:

- Hickory Grove was selected by CIPCO as the preferred site because of its proximity to existing infrastructure: the natural gas pipeline to get the fuel source into the plant and the CIPCO-owned transmission line to get the power out. Fair Station, while a good location for a coal-fired facility, is 10-15 miles away from an adequately sized natural gas pipeline which would increase costs for CIPCO members who will pay to construct the facility and will result in more disruption of land and affect more landowners due to the distance. As a comparison, Hickory Grove is one-quarter mile away from an adequate pipeline.

- When the decision was made to close the facility in 2013, CIPCO did consider repowering the site to natural gas and decided against doing so. In the last dozen years, nothing has materially changed that would result in Fair Station being a prudent option to repower to gas now, especially given CIPCO's current need is approximately 4 times the size of the old coal plant. Other than simply previously "owning" the land that Fair Station operated from, CIPCO believes that nothing has developed since 2013 that makes the location in Muscatine County any more appealing. In fact, as time has gone by, the location can arguably have become less appealing for various reasons including:

    - The site was returned to greenfield status with all waste materials removed offsite under regulated disposal.

    - CIPCO no longer owns the majority of the former site which was sold a number of years ago. CIPCO just owns the land which still contains the old substation and 69 kV exit lines.

- Although CIPCO had infrastructure on site previously, merely having a switching station onsite or nearby doesn't automatically make the site "a slam dunk" for generator interconnection. Even if CIPCO attempted to put a new generator at Fair Station, it is likely that substations would need to be completely rebuilt and expanded, which again, increases costs for CIPCO members.

- Challenges due to the site's proximity to the Mississippi River. The Fair Station site was ideal for a small coal-fired plant given the availability to barge coal up the Mississippi to the plant. Even if CIPCO was able to buy back the land, the site would need to be completely regraded and built up to avoid flooding which would reasonably have substantial impact upon the local environment, requiring heavy permitting with Army Corps of Engineers and the U.S. Fish & Wildlife Service. These realities would also increase construction costs that would be absorbed by rural member consumers who ultimately will pay to build, operate, and maintain the facility.

b. Riverside Generating Station – Riverdale, IA (Scott County)

The Riverside Generating Station is a MidAmerican Energy Company owned facility that operated as a coal fired plant for nearly 100 years. MidAmerican decided to cease coal operations at the plant in 2013 and ran the plant minimally on natural gas until it completely shuttered in 2021. While the plant was capable of operating on natural gas utilizing existing infrastructure, the capacity of the site was 136 MW which is about half the capacity of the proposed Hickory Grove site. Similar to the Fair Station comparison, the Riverside site would require substantial infrastructure upgrades to provide adequate gas input and transmission output to achieve 240 MW. Substantial disruption to the City of Bettendorf and its residents/landowners would be required in order to complete the construction work if Riverside was to be repowered. Furthermore, and perhaps most importantly, Riverside is not currently "on the market" and for sale by MidAmerican. Even if it were for sale, the site has significant challenges present, also similar to Fair Station, due to the existing coal ash pond that CIPCO would take responsibility/liability for, as well as close proximity to the Mississippi river that mirrors flood plain impediments discussed in the Fair Station comparison.

c. Princeton Area – Princeton, IA (Scott & Clinton Counties)

CIPCO has fielded questions as to why a more appropriate location in northeastern Scott County or southern Clinton County was not selected due to proximity to transmission lines, natural gas pipelines and lower Corn Suitability Rating (CSR) scored land. While the latter of the three points is accurate, the first two points are unworkable and unrealistic options for CIPCO to consider. Similar to Maysville, there exists infrastructure that theoretically could interconnect sources of generation in the area, but the existing transmission lines are not owned by CIPCO and thus, to secure a position in the MISO queue process would take at minimum an additional 3 years to achieve. Most importantly, the gas pipeline in the area can be described as "wet gas" which means that the type of gas moving through the pipeline is not conducive for the operation of a natural gas peaking power plant. That particular pipeline runs from Canada and North Dakota through Iowa and into a refinery terminal near Chicago that takes the wet gas and pulls elements out of the liquid which is then used for other industries. This comparison is akin to saying that a barrel of diesel and a barrel of ethanol can fuel the same type of engine. It simply won't work.

XIII. ADDRESSING PUBLIC MISINFORMATION

CIPCO understands and respects the right of community members to express concerns and participate in the public process. Consistent with that commitment, the cooperative has attended every public hearing and meeting to which it has been invited, with the intent of providing accurate information, educating interested residents about the proposal, and engaging in constructive dialogue with those seeking clarity regarding HGGS.

As the process advanced to consideration by the Board of Supervisors, however, CIPCO has become increasingly concerned about the circulation of inaccurate and misleading information within the community. Unfortunately, fear-based rhetoric, factual inaccuracies, and unsubstantiated allegations have at times obscured substantive issues relevant to the Board's decision.

A significant portion of the opposition raised by the Concerned Citizens of Scott County (CCSC) centers on asserted health impacts derived from reports and materials that do not accurately reflect the technology proposed for HGGS. In several instances, these materials rely on emissions data associated with coal-fired generation or outdated technologies that are not applicable to CIPCO's proposed modern natural gas–fired facility.

a. GAO Report – Electricity Information on Peak Demand Power Plants

CCSC relies heavily on a May 2024 U.S. Government Accountability Office (GAO) report, "Electricity: Information on Peak Demand Power Plants." While cited as evidence, by its own admission, the report does not distinguish between fuel types, facility age, or technology—factors that significantly influence emissions outcomes. As a result, its findings do not provide an accurate comparison to the proposed HGGS, which will undergo a rigorous permitting and review process.

The GAO study itself highlights how merging all fuel types distorts emissions data, noting that fuel characteristics alone can meaningfully shift reported outcomes. When HGGS-specific data is overlaid on the report's charts, the difference becomes clear.

Table 2: Sulfur Dioxide and Nitrogen Oxide Emissions from Fossil-fueled Peaker and Non-peaker Power Plants with Nameplate Capacity Greater than 25 MW, 2021

	Fuel Type	Peaker	HGGS	Non-peaker
Median sulfur dioxide emission rate (pounds per megawatt hour)	Natural Gas	0.008[b]	0.007	0.005
	Coal	2.487		1.308
	Oil	4.218		2.174
	Other[a]	—		0.027
	All fuel types	**0.009**		**0.008**
Median nitrogen oxides emission rate (pounds per megawatt hour)	Natural Gas	0.949[b]	0.32	0.156
	Coal	1.554		1.330
	Oil	15.014[b]		3.152
	Other	—		0.670
	All fuel types	**1.272[b]**		**0.468**
Total annual sulfur dioxide emissions (tons)	—	32,111	1.3	1,014,787
Total annual nitrogen oxides emissions (tons)	—	83,874	51	885,345

Source: GAO analysis of Environmental Protection Agency data. | GAO-24-106145

The U.S. Clean Air Act requires EPA to set National Ambient Air Quality Standards (NAAQS) for pollutants which can be harmful to public health and the environment. The Clean Air Act identifies two types of national ambient air quality standards. Primary standards provide public health protection, including protecting the health of "sensitive" populations such as asthmatics, children, and the elderly. Secondary standards provide public welfare protection, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings. The GAO report fails to mention the NAAQS protections. Instead, the analysts follow activists claims that there are health effects from peaking power plants. The presumption in the report is that any level of emissions is bad: The GAO report completely ignores the NAAQS process to determine acceptable ambient air quality levels.

The bottom line is that the IDNR will verify that HGGS meets or exceeds EPA New Source Performance Standards. IDNR will not allow HGGS to be built if it would cause local ground level air quality to degrade in accordance with the EPA's National Ambient Air Quality Standards (NAAQS).

b. New York State Report

At a January 21, 2026, CCSC meeting in Eldridge, a family practice physician, Dr. Ross Burandt, presented research on respiratory hospitalizations near fuel-fired power plants based on data from 1993-2008 titled, "Association between Residential Proximity to Fuel-Fired Power Plants and Hospitalization Rate for Respiratory Diseases." However, the study he cited grouped coal, oil, natural gas, and landfill gas facilities together and acknowledged that no clear or consistent patterns emerged when fuel types were analyzed separately.

Preliminary analyses of hospitalization rates associated with residence in a zip code with a power plant classified according to the type of fuel used as an energy source did not indicate clear or consistent patterns. Therefore, we classified patients as exposed if they resided in a zip code with at least one fuel-fired power plant, regardless of the fuel used, at the time of hospitalization.

The study also did not control for major health determinants such as genetics, smoking rates, occupation, indoor air exposure, or healthcare access—limitations that significantly weaken its relevance to HGGS.

Recent data from New York's SPARCS database (2022–2024), using the same parameters as the original study, again shows no consistent relationship between hospitalizations and specific fuel types. This reinforces that the study's findings cannot be attributed to natural gas facilities in isolation.

c. False Accusations by CCSC Attorney, Mr. Mike Meloy

At the January 21 meeting marketed by the CCSC to discuss the HGGS proposal, CIPCO was not invited to participate. Unfortunately, it appears that the meeting's purpose was an effort to further cast accusations against CIPCO and promote conspiracy theories to those in attendance. According to an article in the North Scott Press published on January 28, CCSC's own attorney made the false accusation that CIPCO was proposing to build what he determined was unnecessary and that the cooperative's motivation was "for profit". CIPCO, like every other electric cooperative in Iowa, is a not-for-profit cooperative that adheres to the cooperative business model. Since CIPCO's inception in 1946, the cooperative has never been motivated by profit. Again, like any other cooperative, if CIPCO comes in at the end of the fiscal year "under budget," excess revenues, referred to as margins, are allocated back to its members that own the cooperative. Funds returned to members of cooperatives is referred to as patronage. CIPCO has returned patronage to our members to the tune of over $145 million dollars since the cooperative was formed. Cooperatives like CIPCO are owned by those we serve, not stockholders and investors. Mr. Meloy's comments are incendiary and false.

Mr. Meloy went on to allege that the zoning amendment had been "secretly enacted or done under the radar." We have detailed above the process that CIPCO followed to get the application to this point. If Mr. Meloy would simply review the public record on CIPCO's zoning text amendment proposal, he would know his accusations are false. Mr. Meloy has presented nothing but unsubstantiated allegations. To assert that CIPCO has acted in any way other than transparently throughout this process is simply false and inflammatory.

Mr. Meloy is wrong in both of his assertions. It should be expected that a professional attorney would employ a higher degree of caution when making public accusations without any evidence to support his claims.

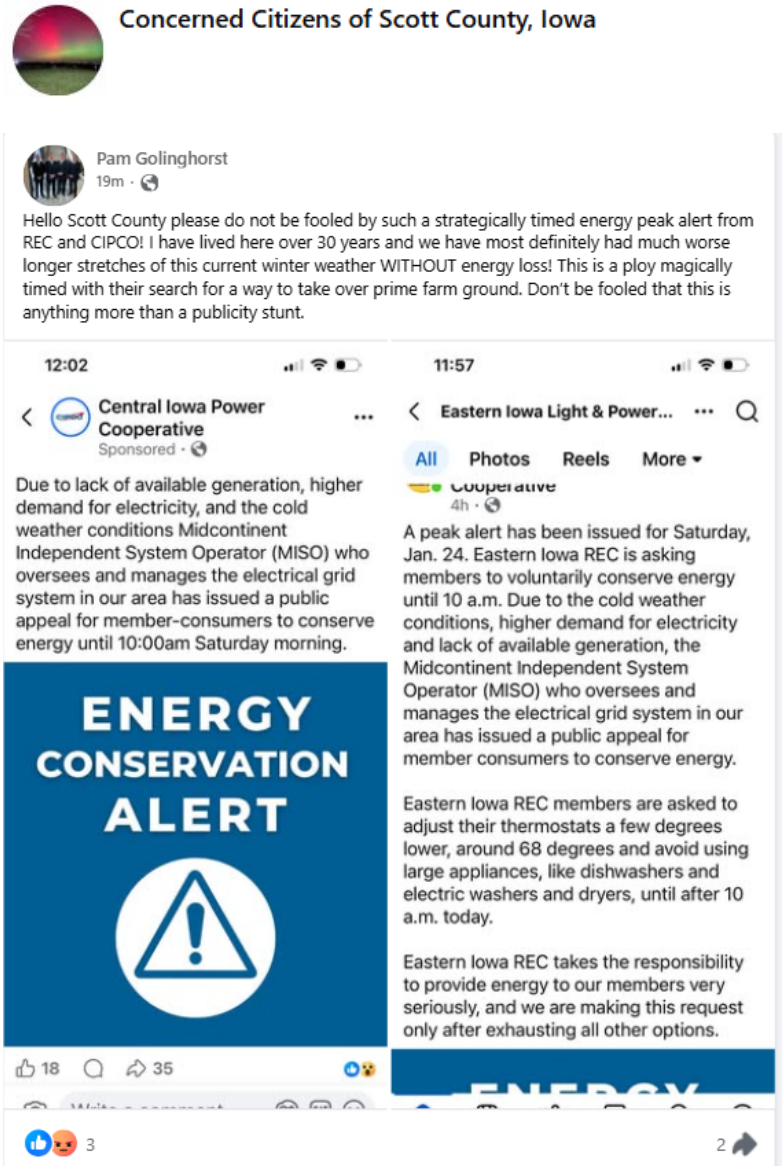
d. Unsubstantiated Conflict of Interest Claim

As CIPCO has noted above, the Board's decision to suspend the process was not due to anything incomplete or inaccurate with CIPCO's application. Instead, members of the CCSC were successful in preventing the process from moving forward based on a claim of conflict of interest between the landowner CIPCO intends to purchase the ground from where the HGGS will be located and Chairman Maxwell. Despite the lack of legal citations or evidence to support the allegations, the Board tabled the

application. It would appear now that the conflict-of-interest speculation was just that, nothing more. In any county or community in Iowa, especially those in smaller towns and unincorporated areas, people know each other. People go to school together, work together, serve on the fire department together, go to church together, raise their families together, and yes, even sometimes those familiar neighbors do business together. That is the way rural Iowa works. It seems there is some level of surprise, if not disdain, from the CCSC that the local government is guilty of having local connections.

e. Reckless and False Claims by the CCSC Regarding the Severity of Winter Storm Fern

Despite the severity of the energy emergency caused by Winter Storm Fern documented above, on the morning of Saturday January 24, 2026, members of the Concerned Citizens of Scott County took to social media making false claims to slander CIPCO, alleging that the energy emergency was manufactured as a publicity stunt.



CIPCO cannot control the weather, wind and solar generation performance, or MISO grid directives. What we can control is whether we do our job – and our job is to keep the lights on, homes heated in winter or cooled in summer, farms running for the safety of animals, and businesses functioning, every hour of every day. Encouraging the public to ignore legitimate conservation requests during a grid emergency is not just reckless; it puts everyone at risk. Statements noting that CIPCO's request was "a ploy magically timed with their search for a way to take over prime farm ground," is intentional misinformation to place fear in residents. Had the Hickory Grove facility been operational, it certainly would have operated – just like our other peaking plant – helping relieve grid stress and improving energy security for Maysville, Scott County, and the region.

This accusation was false, offensive, and irresponsible. It demonstrates the need to question the integrity and truth behind any of their claims. Whether guided by legal counsel to remove the libelous claim to damage CIPCO's reputation, or a change of heart realizing the post was grossly in error, the post was later removed. However, it will live on here for public record.

Members of the Concerned Citizens of Scott County have advanced claims of impropriety, secrecy, conspiracy, and seek to instill fear in the public. While the rhetoric varies, the substance does not: these allegations are unsupported by facts and contradicted by the public record.

CIPCO is disappointed that a serious discussion about critical electric infrastructure has been diverted by inflammatory accusations rather than grounded analysis. Decisions affecting reliability, affordability, and public safety demand facts, transparency, and reasoned judgment—not speculation or fear.

CIPCO urges the community and the Board of Supervisors to set aside these unfounded narratives and focus on the merits of the application and the documented need for reliable electric generation in Scott County.

XIV. ROLES OF GOVERNMENT

The development of a new electric generating facility in Iowa is a complex and multi-year undertaking that requires coordination among numerous entities. Each level of government plays a defined role as projects are reviewed, vetted, and approved or denied through established processes. While the overall framework is rigorous, the responsibilities of each level of government are straightforward and well understood.

At the federal level, national energy policy establishes the overarching framework within which generation resources are developed. Nearly every major energy infrastructure project in the United States is shaped by federal policy, and the HGGS is no exception.

CIPCO would not—and could not—pursue construction of a natural gas–fired peaking facility without federal authority and oversight. Recent federal actions, including declarations of national energy supply challenges and directives to delay the retirement of existing generation resources due to capacity constraints, underscore the need for additional dispatchable generation such as HGGS.

Consistent with longstanding practice, CIPCO intends to finance a portion of the HGGS through U.S. Department of Agriculture (USDA) Rural Utilities Service (RUS) loans, as it has done for major infrastructure investments during CIPCO's nearly eighty years of existence. This process ensures federal review of both the technical and economic merits of the project before construction can proceed. From an environmental permitting perspective, the EPA establishes and enforces emissions standards applicable to the facility.

While the EPA sets the thresholds, the agency instructs the Iowa Department of Natural Resources (DNR) to also vet and issue air and water quality permits if the applicant meets the requirements and criteria set forth by the Environmental Protection Act. The DNR will not treat CIPCO any differently than any other utility requesting these permits, nor will the state agency treat Scott County any differently than the other 98 counties in this process. That confirmation was submitted to the Scott County Board of Supervisors by the DNR Air Quality Bureau Chief on January 8th.

Additionally, it is the law of the State of Iowa that the Iowa Utilities Commission is the recognized authority over determining the need for any energy generation facility of 25 MW or larger to be constructed. State law requires that an applicant proposing a generation facility must obtain a generating certificate from the IUC. The IUC will consider the data and information CIPCO will submit to them and make a determination as to whether the cooperative has demonstrated an adequate need to construct and operate the peaking facility. That is, the Board of Supervisors may have an opinion about the necessity of the HGGS, but it is not the responsibility of, nor does it have the authority in making that determination.

Iowa code 476A.6 sets forth the decision criteria the IUC must utilize in making its determinations. That section requires a showing that the service and operations resulting from the construction of the facility are consistent with legislative intent, as expressed in Iowa Code Section 476.53. That intent is captured in the portion of the section quoted below:

> *Iowa Code Chapter 476.53*
> *1. It is the intent of the general assembly to attract the development of electric power generating and transmission facilities within the state in sufficient quantity to ensure reliable electric service to Iowa consumers and provide economic benefits to the state. It is also the intent of the general assembly to encourage rate-regulated public utilities to consider altering existing electric generating facilities, where reasonable, to manage carbon emission intensity in order to facilitate the transition to a carbon-constrained environment.*
> *2. a. The general assembly's intent with regard to the development of electric power generating and transmission facilities, or the significant alteration of an existing generating facility, as provided in subsection 1, shall be implemented in a manner that is cost-effective and compatible with the environmental policies of the state, as expressed in this Title XI.*
> *b. The general assembly's intent with regard to the reliability of electric service to Iowa consumers, as provided in subsection 1, shall be implemented by considering the diversity of the types of fuel used to generate electricity, the availability and reliability of fuel supplies, and the impact of the volatility of fuel costs.*

CIPCO would also like to highlight the perspectives shared by other elected officials who represent the citizens of Scott County. Ironically, on the same day that the media reported on the Supervisors' intentions to vote down CIPCO's proposed zoning text amendment for thermal electric energy generating facilities, local media also reported on a roundtable discussion including area lawmakers that represent portions of Scott County at the Statehouse. The topic of energy and the HGGS were part of the discussion during the event, and these elected Representatives and Senators made bipartisan comments about how they have been shown data and information that have led them to believe that more electricity generation is critically needed in the State of Iowa.

CIPCO has included the relevant section of the article that was published in The North Scott Press on January 28, 2026, to ensure it is part of the record here:

> *"Mohr and Webster said that guaranteeing cheap and available power was a priority for Republican leadership this term. 'Both sides talk about increasing jobs. We want companies to come to this state. We want you guys to increase your employment in this state. We need to have plentiful, cheap energy," Mohr said. 'I'm in favor of all kinds—solar, gas fired power plants, nuclear,' he added.*
>
> *'As we look to the future, our energy demands are increasing tremendously, and we have to be ahead of that.' 'I would say the same thing's happening in the Senate,' Webster said. 'We're having an across-the-board conversation on how to make sure that Iowa is an across-the-board energy state.' 'This is a conversation that's going on at the upper echelons of the Iowa Senate and the majority party, quite often, almost daily,' he continued.*
>
> *Linn County recently finalized a rezoning ordinance that could bring the defunct Duane Arnold nuclear plant back online by 2029. Central Iowa Power Cooperative (CIPCO) has proposed construction of a $400 million, 240-MW natural gas 'peaking' plant in rural Scott County. After the meeting, Webster told The North Scott Press that approval of the Maysville plant was still a 'local' issue. But he hoped to see it move forward. 'It'd be unfortunate if they can't work out a solution,' he said. 'The need for power is huge.' 'Overall, it's a county board decision. But it's a regional problem,' he added.*
>
> *Gosa said that the state should get behind energy projects that would bring hundreds of temporary construction jobs to the state—jobs he used to work, he said. 'My career, my livelihood, was made on temporary jobs. I worked in construction. Some years, I might have had 20 different W-2s,' he said. And the demand for power was undeniable. 'There is a very high demand for power. There's going to come a point where you're going to go flip that light switch on and the light's not going to come on. We need it. We need to address it and get it done,' Gosa said."*

XV. CLOSING

CIPCO has demonstrated a clear and immediate need. Public policy must also ensure the next generation of citizens have access to the same quality of electric service we enjoy today. To ensure safe, reliable, and affordable electricity that supports strong communities and a competitive economy, Scott County must adopt reasonable zoning policies that allow for the responsible development of critical public infrastructure. Failure to do so places the county at greater risk of supply constraints and higher costs borne by residents, farmers, and businesses.

Inaction and a not-in-my-backyard mentality to critical infrastructure will only exacerbate reliability risks and increase costs for the very communities the Scott County Board of Supervisors is charged with serving. Reasonable regulation and zoning play a key role in protecting people and property, but they should not be used to impede progress or prevent responsible growth. Energy policy and infrastructure projects must be evaluated objectively, based on facts. Decisions should not be based on speculation, emotion, or political convenience.

A vote against this ordinance is, in effect, a vote against reliable electric generation in Scott County. It sends a clear signal that rural electric cooperatives are not welcome to build and operate 24/7, dispatchable

generation needed to serve unincorporated areas of the county. For these reasons, CIPCO respectfully urges the Board of Supervisors to vote in favor of the proposed zoning text amendment and approve the addition of “Thermal Electric Energy Generation Facility” as a special permitted use within the A-P zoning district.