

STATE OF IOWA
DEPARTMENT OF COMMERCE
BEFORE THE IOWA UTILITIES BOARD

IN RE: PEAK ALERT RULES	DOCKET NO. RMU-2014-0007
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STATEMENT OF POSITION

The Office of Consumer Advocate (OCA), a division of the Iowa Department of Justice, for its Statement of Position submits:

The OCA is generally supportive of the amendments proposed by the Iowa Utilities Board. The proposed rules recognize the importance of retaining peak alert requirements to help advance energy efficiency policy. With that purpose in mind, OCA recommends the following modification indicated in the italicized provisions below:

ITEM 1. Amend subrule **20.11(1)** as follows:
Annual notice. Each electric utility shall provide its customers, on an annual basis, with a written notice ~~explaining how growth in demand affects a utility's investment costs and why reduction of customer usage~~ that informs customers of the benefits of energy efficiency and the significance of reductions in consumption of electricity during periods of peak demand ~~may help delay or reduce the amount of future rate increases.~~

With this modification, OCA contemplates that utilities would include a reference to their energy efficiency programs in the peak alert notice. In keeping with the Board's desire to maintain flexible peak notice requirements, the utilities may determine the scope and content of energy

efficiency information to be included in the annual notice.

Respectfully submitted,

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