



Industrial Energy Applications, Inc.
200 1st Street SE, Suite 1500
Cedar Rapids, IA 52401

April 30, 2014

Executive Secretary
Iowa Utilities Board
1375 East Court Avenue RM 69
Des Moines, IA 50319-0069

**FILED WITH
Executive Secretary
April 30, 2014
IOWA UTILITIES BOARD**

RE: Docket No. INU-2014-0001

Dear Madam Secretary:

Attached for filing, please find Industrial Energy Application Inc.'s Petition to intervene in the above docketed matter.

If you have questions, please feel free to contact me.

Regards,

REDACTED

Randy Portz, President

April 30, 2014

IOWA UTILITIES BOARD

**STATE OF IOWA
DEPARTMENT OF COMMERCE
UTILITIES DIVISION
BEFORE THE IOWA UTILITIES BOARD**

IN RE:

**INTERSTATE POWER AND LIGHT
MIDAMERICAN ENERGY**

DOCKET NO. INU-2014-0001

PETITION TO INTERVENE

COMES NOW Industrial Energy Applications, Inc. ("**IEA**") and, pursuant to 199 IAC 7.13, petitions the Iowa Utilities Board ("**Board**") for an order permitting IEA to intervene in this docket. In support of its petition, IEA states:

1. IEA owns, operates and maintains a fleet of standby generators on behalf of a number of a number of industrial and large commercial customers located within Interstate Power and Light Company's ("**IPL**") assigned service territory in Iowa.
2. Many of IEA's customers are large employers within the State of Iowa.
3. IEA's customers employ the standby generators to support their critical operations during periods of severe weather, natural disasters or other instances when power quality may be of issue.
4. Most of IEA's customers voluntarily participate in IPL's interruptible program as a means of paying for the standby generators.
5. The compensation received by IEA's customers is a function of the avoided cost for the alternative to customer interruption.
6. IEA's customers and IEA are impacted by avoided cost methodologies employed by IPL and as sanctioned by the Board.
7. In addition, IEA is an IPL electric service customer and has a clear interest in the subject matter of this docket and expects to be affected by its outcome.
8. For the foregoing reasons, IPL has interests that are unique to IEA with respect to the docket and requires representation in addition to the interests represent by the Office of Consumer Advocate.

9. IEA has no means to protect its interest adequately other than by intervention in this Docket.
10. IEA will be represented in this docket by either Randy Portz, its President or Bryan P. McGothlin, its Vice President.
11. IEA may submit direct testimony and exhibits and may choose to participate in hearings, including the cross-examination of witnesses.
12. IEA's participation in this docket can reasonable be expect to assist in the development of a sound record through the presentation of reliant evidence and argument.

WHEREFORE, IEA respectfully petitions the Board to issue an order permitting IEA to intervene in this Docket and to participate as its interests appear.

Dated: April 30, 2014

Respectfully submitted by,

INDUSTIAL ENERGY APPLICATIONS, INC.

By _____/s/_____

Randy Portz
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