

STATE OF IOWA
DEPARTMENT OF COMMERCE
UTILITIES BOARD

**FILED WITH
Executive Secretary
October 08, 2014
IOWA UTILITIES BOARD**

IN RE:

INQUIRY INTO BILL PAYMENT
AGREEMENTS FOR ELECTRIC AND
NATURAL GAS SERVICE

DOCKET NO. NOI-2014-0003

REQUEST FOR CLARIFICATION

The Iowa Association of Municipal Utilities (IAMU) appreciates the opportunity to file a response in this Notice of Inquiry. The Board's order issued August 6, 2014, included a discussion of the Level Payment Plan rules found in 199 IAC 19.4(11)(e) and 20.4(12)(e). The Order stated that "some utilities are not following the Board's rules with regard to procedures established for level payment plans..."

While IAMU has encouraged its members to follow the Board's rules as a model and has included the substance of the rules in our model gas and electric service tariff's, it is IAMU's contention that municipal gas and electric utilities are not required to do so. Board Jurisdiction over municipal gas and electric utilities is limited by Iowa Code Section 476.1B or as elsewhere stated in the Iowa Code. IAMU agrees that Section 476.1B gives the Board jurisdiction over "disconnection" issues as provided in Section 476.20. However, it has never been IAMU's belief that level payment plan rules fell within that definition. IAMU seeks clarification of this issue from the Board

Respectfully Submitted,

Troy DeJoode
IAMU Executive Director