

STATE OF IOWA
DEPARTMENT OF COMMERCE
UTILITIES BOARD

FILED WITH
Executive Secretary
August 20, 2013
IOWA UTILITIES BOARD

IN RE: BLACK HILLS/IOWA GAS UTILITY, LLC, d/b/a BLACK HILLS ENERGY	DOCKET NO. EEP-2013-0001
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JOINT STATEMENT OF ISSUES

Black Hills/Iowa Gas Utility, LLC d/b/a Black Hills Energy (“***Black Hills Energy***”), the Office of Consumer Advocate (“***OCA***”), and the Winneshiek Energy District (“***WED***”), jointly referred to as the “Parties,” submit the following statement describing the contested issues that require resolution in the above-captioned docket.

While the Parties have made a good faith effort to accurately and concisely identify the issues listed herein, this document is intended to be merely a guide and neither an admission nor a limitation with respect to any issues that may arise at hearing or may be addressed in the Parties’ briefs.

LIST OF ISSUES

The Parties request that the Iowa Utilities Board (“***Board***”) determine, with regard to Black Hills Energy’s proposed 2014 - 2018 Energy Efficiency Plan (“***EEP***”):

1. Whether Black Hills Energy's proposed EEP, as a whole, is cost-effective under the societal test, utility cost test, rate-payer impact test, and participant test, pursuant to Iowa Code § 476.6(14).
 - a. Black Hills Energy
 - i. Rebuttal Testimony of Dr. Tina Jayaweera
 - ii. Direct and Rebuttal Testimonies of James Dillon
 - b. OCA
 - i. Direct Testimony of Sheila Parker
 - ii. Direct Testimony of Rebecca Foster
2. Whether Black Hills Energy's proposed EEP meets the plan requirements set forth in 199 IAC 35.8-10.
 - a. Black Hills Energy
 - i. Rebuttal Testimony of Dr. Tina Jayaweera
 - ii. Direct and Rebuttal Testimonies of James Dillon
 - b. OCA
 - i. Direct Testimony of Sheila Parker
 - ii. Direct and Surrebuttal Testimony of Rebecca Foster
 - iii. Direct Testimony of Blake Kruger
 - iv. Direct Testimony of Frank Bodine
 - v. Direct Testimony of Fasil Kebede
 - c. WED
 - i. Direct and Surrebuttal Testimonies of Andrew Johnson
3. Whether Black Hills Energy recognizes the appropriate amount of achievable economic potential pursuant to the 2012 Statewide Assessment of Energy and Capacity Savings Potential in Iowa (Statewide Assessment); whether the Statewide Assessment is accurate and complete; and whether Black Hills Energy should recognize a higher level of potential, including the impact a higher level of potential would have on customers and resource planning.
 - a. Black Hills Energy
 - i. Rebuttal Testimony of Dr. Tina Jayaweera
 - b. OCA

- i. Direct Testimony of Rebecca Foster
 - c. WED
 - i. Direct and Rebuttal Testimonies of Andrew Johnson
- 4. Whether Black Hills Energy's proposed annual savings targets are appropriate including the assumption of an IECC 2012 baseline.
 - a. Black Hills Energy
 - i. Rebuttal Testimony of Dr. Tina Jayaweera
 - ii. Direct and Rebuttal Testimonies of James Dillon
 - iii. Rebuttal Testimony of Matthew Daunis
 - b. OCA
 - i. Direct Testimony of Rebecca Foster
 - ii. Direct Testimony of Sheila Parker
 - c. WED
 - i. Direct and Rebuttal Testimonies of Andrew Johnson
- 5. Whether Black Hills Energy's proposed energy efficiency programs, marketing and outreach strategies, incentive strategy and budgets are appropriate to achieve the planned energy savings, and whether supplemental performance based criteria are appropriate to help maximize achievement of cost effective energy efficiency opportunities as needed.
 - a. Black Hills Energy
 - i. Rebuttal Testimony of Dr. Tina Jayaweera
 - ii. Direct and Rebuttal Testimonies of James Dillon
 - b. OCA
 - i. Direct and Surrebuttal Testimony of Rebecca Foster
 - ii. Direct and Surrebuttal Testimony of Sheila Parker
 - iii. Direct Testimony of Fasil Kebede
 - c. WED
 - i. Direct and Rebuttal Testimonies of Andrew Johnson
- 6. Whether Black Hills Energy's proposed energy efficiency programs demonstrate a sufficient level of consistent and sustained coordination, such that there is integrated and

systematic and cost-effective implementation of energy efficiency measures within and across program sectors, including the low-income sector.

- a. Black Hills Energy
 - i. Rebuttal Testimony of Dr. Tina Jayaweera
 - ii. Rebuttal Testimony of Lark Lee
 - iii. Rebuttal Testimony of Matthew Daunis
 - iv. Direct and Rebuttal Testimonies of James Dillon
 - v. Rebuttal Testimony of Pat Rice
 - b. OCA
 - i. Direct Testimony of Sheila Parker
 - ii. Direct Testimony of Rebecca Foster
 - iii. Direct Testimony of Blake Kruger
 - iv. Direct Testimony of Frank Bodine
 - v. Direct Testimony of Fasil Kebede
 - c. WED
 - i. Direct and Rebuttal Testimonies of Andrew Johnson
7. Whether Black Hills Energy has proposed an appropriate plan and budget for the evaluation, measurement and verification of its EEP.
- a. Black Hills Energy
 - i. Rebuttal Testimony of Lark Lee
 - b. OCA
 - i. Direct Testimony of Rebecca Foster
 - ii. Direct Testimony of Sheila Parker
 - iii. Direct Testimony of Fasil Kebede
8. Whether technical assistance standards are adequate and effective to achieve high levels of “conversion,” or practice implementation, and to adequately attribute practice implementation and savings back to technical assistance provided versus stand-alone prescriptive or customer rebates.
- a. Black Hills Energy
 - i. Rebuttal Testimony of Dr. Tina Jayaweera
 - b. OCA
 - i. Direct Testimony of Sheila Parker

- c. WED
 - i. Direct and Surrebuttal Testimonies of Andrew Johnson
- 9. Whether technical assistance, energy auditing, assessments, planning, follow through, to all customer classes should be open to qualified energy professionals not currently participating in Black Hills Energy's EEP.
 - a. Black Hills Energy
 - i. Direct and Rebuttal Testimonies of James Dillon
 - b. OCA
 - i. Direct Testimony of Rebecca Foster
 - ii. Direct and Surrebuttal Testimony of Sheila Parker
 - iii. Direct Testimony of Fasil Kebede
 - c. WED
 - i. Direct and Surebuttal Testimonies of Andrew Johnson
- 10. Whether a more formal collaboration and/or enhanced reporting process for energy efficiency plan performance is warranted.
 - a. Black Hills Energy
 - i. Rebuttal Testimony of Dr. Tina Jayaweera
 - ii. Rebuttal Testimony of Matthew Daunis
 - iii. Direct and Rebuttal Testimonies of James Dillon
 - b. OCA
 - i. Direct Testimony of Rebecca Foster
 - c. WED
 - i. Direct and Surrebuttal Testimonies of Andrew Johnson
- 11. Whether Black Hills Energy has proposed appropriate Residential Portfolio Programs, including the potential for stand-alone direct install programming open for implementation by qualified community level organizations, including, but not limited to, Green Iowa Americorps teams and hosts.
 - a. Black Hills Energy
 - i. Direct and Rebuttal Testimonies of James Dillon

- b. OCA
 - i. Direct Testimony of Sheila Parker
 - ii. Direct Testimony of Blake Kruger
 - c. WED
 - i. Direct and Surrebuttal Testimonies of Andrew Johnson
12. Whether Black Hills Energy has proposed appropriate Nonresidential Portfolio Programs.
- a. Black Hills Energy
 - i. Direct and Rebuttal Testimonies of James Dillon
 - b. OCA
 - i. Direct Testimony of Frank Bodine
 - ii. Direct Testimony of Fasil Kebede
 - iii. Direct and Surrebuttal Testimony of Sheila Parker
 - c. WED
 - i. Direct and Surrebuttal Testimonies of Andrew Johnson
13. Whether Black Hills Energy's support for tree-planting programs is appropriate.
- a. Black Hills Energy
 - i. Rebuttal Testimonies of James Dillon
 - b. OCA
 - i. Direct Testimony of Frank Bodine
14. Whether Black Hills Energy has proposed appropriate Outreach, Education and Training Portfolio Programs, including the potential local or community programs, including, but not limited to, Green Iowa Americorps teams and hosts for local activities.
- a. Black Hills Energy
 - i. Rebuttal Testimony of Pat Rice
 - b. OCA
 - i. Direct Testimony of Frank Bodine
 - c. WED

- i. Direct and Surrebuttal Testimonies of Andrew Johnson
- 15. Whether Black Hills Energy is appropriately integrating a market transformation approach in its EEP, and if so, what are the implications of market transformation, e.g., when the market has been transformed via codes and standards or other intervention strategies.
 - a. Black Hills Energy
 - i. Rebuttal Testimony of Dr. Tina Jayaweera
 - ii. Direct and Rebuttal Testimonies of James Dillon
 - b. OCA
 - i. Direct and Surrebuttal Testimony of Rebecca Foster
- 16. What considerations there should be regarding a technical reference manual, including formulation, consistency among utilities, timing of implementation, and independent oversight process and administration.
 - a. Black Hills Energy
 - i. Rebuttal Testimony of Dr. Tina Jayaweera
 - ii. Rebuttal Testimony of Lark Lee
 - b. OCA
 - i. Direct Testimony of Rebecca Foster
 - ii. Direct Testimony of Sheila Parker
 - c. WED
 - i. Direct and Surrebuttal Testimonies of Andrew Johnson
- 17. What the implications are of, and what consideration should be given to, implementing net-to-gross ratios of other than 1.0 for specific programs.
 - a. Black Hills Energy
 - i. Rebuttal Testimony of Dr. Tina Jayaweera
 - b. OCA
 - i. Direct Testimony of Rebecca Foster

CONCURRENCE

Counsel or representatives for all Parties to this proceeding have authorized the undersigned to state that they have read and approved this Joint Statement of Issues.

Dated August 20, 2013.

Respectfully submitted,

BLACK HILLS ENERGY

/s/ Leanna D. Whipple

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