STATE OF IOWA
DEPARTMENT OF COMMERCE
BEFORE THE IOWA UTILITIES BOARD

IN RE: MIDAMERICAN ENERGY COMPANY	DOCKET NO. EEP-2012-0002

BRIEF AND INITIAL COMMENTS OF THE
OFFICE OF CONSUMER ADVOCATE

Mark R. Schuling
Consumer Advocate

Jennifer C. Easler
Attorney

1375 Court Avenue, Room 63
Des Moines, Iowa 50319-0063
Telephone: (515) 725-7200
E-mail: IowaOCA@oca.iowa.gov

September 18, 2013 OFFICE OF CONSUMER ADVOCATE

TABLE OF CONTENTS

Page

I. STATEMENT OF THE CASE

A. Procedural History.

On February 1, 2013, MidAmerican Energy Company (MEC) submitted its 2014-2018 Energy Efficiency Plan (EEP) to the Iowa Utilities Board (IUB or Board) for approval. Pursuant to the Board's Order requiring additional information, MEC supplemented its proposed 2014-2018 EEP on February 19, 2013. The Board granted Petitions to intervene filed by Environmental Law and Policy Center, Iowa Environmental Council and Iowa Policy Project (collectively "Environmental Intervenors"), Winneshiek Energy District (WED), Iowa Customers for Energy Efficiency (ICEE), and Deere & Company (Deere).

The Office of Consumer Advocate (OCA) and Intervenors filed direct testimony and exhibits on June 3, 2013. The OCA and Environmental Intervenors submitted rebuttal testimony on June 17, 2013. MEC submitted rebuttal testimony on July 15, 2013. The OCA, Environmental Intervenors, ICEE and WED submitted surrebuttal testimony on July 22, 2013. On July 29, 2013, the parties submitted a Joint Statement of Issues. On August 26, 2013, MEC, OCA, the Environmental Intervenors, ICEE, and Deere filed a Non-Unanimous Partial Settlement Agreement in which these parties reached settlement on several issues submitted in the Joint Statement of Issues. Not all issues were settled and some issues were settled by two or more of the signatories but not all the signatories to the settlement.

A hearing of the matter took place on August 28, 2013. The Board will allow any initial settlement comments to be included with post-hearing briefs and for reply comments to be filed within seven days after post-hearing briefs. (Order Setting Dates for Settlement Comments (Aug. 30, 2013)). This brief is filed in accordance with the procedural schedule issued in this proceeding on February 27, 2013. OCA's brief will focus on the remaining issues from the Joint Statement of Issues, which OCA did not settle.

B. Facts.

This case concerns MEC's proposed energy efficiency plan, budget, and goals for 2014-2018. Iowa's rate-regulated gas and electric utilities are required to offer cost-effective energy efficiency programs that are tailored to meet the needs of all customer classes. Iowa Code § 476.6(14) (2013). The IUB sets each utility's energy efficiency goals based on an assessment of energy efficiency potential, and determines whether the proposed programs and budgets are appropriate for meeting the utility's efficiency goals. Iowa Code §§ 476.6(16)(b), (e) (2013). The rate-regulated utilities undertake assessments of energy efficiency potential and new plan filings on a 5-year cycle. MEC's current 5-year energy efficiency plan runs through year-end 2013. Following a request for proposals, the Iowa Utility Association, selected The Cadmus Group, Inc. to conduct a joint assessment of energy efficiency potential on behalf of investor-owned utilities, MEC, Interstate Power and Light Company (IPL), MidAmerican Energy Company and Black Hills Energy. The joint Assessment of Potential (Statewide Assessment), dated February 28, 2012, is contained in MEC plan filing.

MEC's 2014-2018 EEP proposes total five-year budgets for its combined electric and gas energy efficiency portfolio of $441.08 million.[1] By 2018, these expenditures are projected to achieve over 1,048 gigawatt-hours (GWh) of cumulative first-year electric energy savings, and cumulative first-year natural gas savings of over 22 million therms. (Tr. 388). The plan projects electric savings equivalent to 1.14 percent of forecasted annual electric retail sales in 2014, declining to 0.99 percent in 2015, and to 0.92-0.93 percent in remaining plan years. (Tr. 388).

[1] This figure is exclusive of Residential and Nonresidential Load management Programs and costs associated with Trees and Assessments. (Tr. 388).

Natural gas savings goals start at 0.80 percent of forecasted annual natural gas retail sales in 2014, declining to 0.68% in 2014, and rising to 0.75% in 2018. (Tr. 388). MEC's 2014-2018 plan proposes slightly lower overall savings than the previous plan's five-year targets of 1,374 GWh in electric savings and over 24 million therms of gas savings. (Tr. 389). The proposed EEP is cost-effective, with an overall (electric and gas) portfolio societal cost-benefit ratio of 1.94. The electric energy efficiency portfolio societal cost-effectiveness ratio is 2.00 and the gas energy efficiency portfolio societal cost-effectiveness ratio is 1.79.[2] The proposed plan targets 52 percent of electric market potential and 43 percent of gas market potential for IPL as determined by Cadmus in its report: 2014-2023 Assessment of Energy and Capacity Savings in Iowa (Statewide Assessment). (Tr. 391). The proposed settlement would result in expanded savings and targets for certain measures, including lighting measures and natural gas furnaces (Settlement Issues 11.F and 11.H).

The new plan will require spending at a much higher level to achieve savings comparable to recent years. (Tr. 389, 398). OCA witness Foster explained that program administrators frequently evaluate the first year per unit procurement costs in order to assess the impact of changing budgets and to help assess whether programs are delivering savings at a reasonable cost. (Tr. 454). While MEC is projecting much higher per unit costs in the current plan, witness Foster explained that increasing the depth of savings to more ambitious savings levels can improve program cost-effectiveness due to increased economies of scale. (Tr. 394-395). She identified numerous markets-based approaches for increasing the depth of savings and economies of scale. (Tr. 404-406). Increased focus on Nonresidential programs can also be expected to help deliver cost-effective savings and overcome challenges from changing codes

[2] The indicated societal cost-effectiveness ratios exclude Residential and Nonresidential Load Management Programs and costs associated with Trees and Assessments. (Tr. 388, n. 1).

and standards. (Tr. 399). The enhanced collaboration process in the Settlement Agreement (Issue 10) will provide an opportunity for ongoing review of opportunities to implement cost-effective, customer-centered, performance-based incentives to vendors/contractors that motivate customer engagement, energy efficiency market development and market transformation.

The Statewide Assessment estimated the amount of energy that could be saved in each utility's service territory from 2014 to 2023. The Statewide Assessment of technical and economic potential included only efficient technologies and practices that were "widely commercially available" at the time of the study, accounting for known changes in codes and standards (distinguishable from anticipated changes), technical limitations, and societal cost-effectiveness. (Assessment Part 1, pp. 10-11 of 75). The Assessment assumed fixed costs for measures such as LED over the Assessment period. (Assessment Measure Details). Other limiting assumptions include:

- Early replacement of end-use equipment is not considered; equipment is assumed to be upgraded only at the time of natural replacement
- As the assessment covers 10 years, there may be remaining potential for long-lived equipment beyond the study's time horizon
- Active generating options, such as renewable and combined heat and power (CHP) are excluded
- The identified technical and economic potentials represent gross savings

(Assessment Part 1, p. 10 of 75). The latter assumption is not limiting, but is notable to the extent MEC benchmarks its achievable potential targets against states that utilize net savings estimates. The use of limiting or simplifying assumptions may constrain estimates of potential.

To provide a more realistic upper bound to the estimates of economic potential, the utilities' assessment of market potential or maximum achievable potential used a more narrowly defined scenario to evaluate the amount of savings that might be achieved assuming:

- Incentive payments up to 100% of incremental measure cost
- Financing is available to further address first-cost barriers; and
- Additional economic potential becomes available from emerging technologies

(Joint Assessment Part 1, pp. 12 and 23 of 75).

The utilities' assessment of achievable potential is narrower than a more traditional market or achievable potential assessment. (Joint Assessment, p. 24 of 76). Other factors are also worthy of note in this regard. First, Cadmus does not specifically evaluate the impacts of programming that offers generous incentive levels *and* financing programs; rather, it conducted a literature review of financing programs and concluded that the availability of financing would not significantly impact measure adoption. (Joint Assessment, p. 13 of 76). Second, the estimated cost of pursuing a more aggressive acquisition scenario (Tr. 259-260), does not account for the fact that non-incentive investment may be a more effective approach for expanding savings in the non-residential sector.[3] A procurement strategy that relies more on market transformation and codes and standards strategies could also achieve more aggressive savings at lower cost to the utility's ratepayers. (Assessment, p. 12 of 76). Finally, the assessment of impacts from emerging technologies focused on studies of emerging HVAC and hot water systems. (Assessment, p. 57 of 76).

While simplifying assumptions are not uncommon or inappropriate in a high level assessment of potential process, their use underscores the importance of a periodic review during MEC's five-year energy efficiency plan implementation period to consider changes in

[3] The Statewide Assessment noted that first-cost is not necessarily the primary barrier in all sectors, and highlights that success in effectively promoting energy-efficiency programs depends on the total marketing effort, consisting not only of incentives, but of effective communication, education, and dissemination of information. Program administrators must examine and choose an appropriate mix of these investments, based on the unique characteristics of their service territories, customer needs, and characteristics of programs and products they offer. (Assessment. p. 51 of 76).

circumstances that impact the programs and achievable savings. In this regard, Cadmus recommends the utilities:

- Regularly track the saturation of measures within their own service areas in other jurisdictions.
- Carefully monitor market responses to particular programs, and set incentive levels that minimize free ridership.

Other examples of changed or changing circumstance that can significantly impact programs are noted in MEC witness Yoder's testimony. (Tr. 108-109). In addition to lower cost-effectiveness results for gas efficiency measures and programs, Ms. Yoder recognized that lower natural gas prices could negatively impact customer interest in energy efficiency. (Tr. 108). Also, anticipated codes and standards changes, if enacted, would result in many measures failing the cost-effectiveness criteria and will impact MEC's future savings assumptions. (Tr. 108). The enhanced collaboration process embodied in the settlement (Issue 10) will help address this need for routine review and is compatible with the ongoing review, adjustment, and modification that is provided for energy efficiency plans. Iowa Code § 476.6(16)(e) (2013).

MEC's proposal to participate in a process to develop and maintain a Technical Reference Manual (TRM), which is addressed in greater detail in the Non-unanimous Settlement Agreement (App. 1), will also serve to bring improved precision and more rigorous and frequent review to the deemed savings employed in the Assessment of Potential. OCA witness Foster explained that the development of standard and defensible protocols for calculating savings through a TRM can be expected to contribute to reported savings that more closely map to verified savings as well as provide structure for program planning and goal setting. (Tr. 422). MEC witness Rea explained the many advantages of using a TRM to develop consistent savings assumptions, incremental cost assumptions, useful life assumptions, and baseline assumptions for various energy efficiency offerings. (Tr. 248-251).

II. ARGUMENT

A. Whether Opt-Out Provisions That Would Allow Customers Meeting Certain Criteria To Not Participate In Or Fund Utility-Sponsored Energy Efficiency Programs Should Be Made Available And Whether The Board Should Institute A Rulemaking Proceeding To Develop The Parameters. [Issue 15].

1. Opt-Out is inconsistent with Iowa energy efficiency public policy and unwarranted by the evidence in this case.

ICEE, a coalition of MidAmerican industrial customers that operate within MidAmerican's service territory,[4] recommends the Board adopt an undefined process and criteria for allowing customers to opt-out of funding or participating in MidAmerican's energy efficiency plan. ICEE witness Brubaker proposes that the Board: 1) find that an opt-out provision from utility sponsored EE programs should be available in Iowa; and 2) institute a rulemaking process within three months of the date of the Order in this docket to determine opt-out program parameters and procedures by which customers can opt-out of funding utility administered energy efficiency programs. (Tr. 902-903). ICEE proposes no criteria for this opt-out program.

OCA witness Bodine opposed ICEE's opt-out proposal as being inconsistent with Iowa's long-standing policy of promoting comprehensive energy efficiency policies (Tr. 590-591), and strongly recommended against adopting an undefined opt-out proposal for MEC's energy efficiency plan. (Tr. 593). MEC witness Yoder concurred, noting that ICEE's opt-out proposal would be perhaps the most dramatic change to program delivery in the State of Iowa since energy efficiency program inception. (Tr. 129).

[4] ICEE Petition to Intervene (Apr. 1, 2013). According to the membership listed filed June 25, 2013, the coalition includes: Ag Processing Inc., Alcoa Inc., Cloverleaf Cold Storage, Clow Valve Company, Gelita USA Inc., General Mills Inc., Gerdau Ameristeel, Inc., Gold Eagle Cooperative, Kay-Flo Industries Inc., Little Sioux Corn Processors LP, Nor-Am Cold Storage, Plymouth Energy LLC, Tyson Foods, Inc., US Gypsum Corporation, Valero Energy Corporation.

Iowa public policy promotes energy efficiency as a priority resource in order to reduce Iowa's reliance on energy production from non-renewable energy resources. Iowa Code §§ 476.41, 473.3, 266.39(C). To advance this public policy, Iowa law directs the IUB to oversee the rate-regulated utilities' development and implementation of cost-effective energy efficiency programs that meet the needs of all customer classes. Iowa Code § 476.6(14). Iowa electric utilities are not permitted to procure new generation resources subject to advance ratemaking principle determination without also showing that the utility has in effect a Board-approved energy efficiency plan. Iowa Code § 476.53. In accordance with this Iowa legislative policy, the Board's rules establish the implementation of effective energy efficiency plans by utilities and the opportunity of the utilities' customers to participate in and benefit from the energy efficiency plans to be of the highest priority. 199 IAC 35.1.

ICEE witness Brubaker contends that the primary beneficiary of any energy efficiency service is the customer who receives it directly and as a result experiences a reduction in the quantity of electricity through the meter. (Tr. 899). OCA witness Bodine disagreed, pointing out that all customers, whether or not they directly participate, benefit from energy efficiency programs. The energy efficiency efforts of individual customers, whether they are households, small businesses, or industrial customers, benefit other customers by delaying construction costs, increasing system flexibility, improving reliability, and providing for a cleaner environment. (Tr. 589-90). Energy efficiency has been integral to MEC's commitment to provide its customers with high-quality, low-cost services for more than 20 years. MEC's proposed programs are expected to provide cumulative savings by 2018 of 1.1 billion kilowatt-hours and 22 million therms, and reduce MEC's electric peak demand by 504 MW. The $512 million investment in MEC's proposed programs is expected to yield total net economic benefit of $832 million to MEC and its customers. (Tr. 104)

The purpose of this energy efficiency proceeding is for the Board to act on MEC's assessment of energy efficiency potential and proposed programs for procuring achievable energy efficiency potential. Iowa law requires that energy efficiency plans be determined via a contested case process. Iowa Code § 476.6(16)(e) (2013). Non-residential customers contribute a significant portion of MEC's energy efficiency plan savings. Of the total 228,466,471 kWh savings reported for 2012, MEC's nonresidential program participation contributed 123,935,441 kWh, or more than half of total reported energy savings. (MEC 2012 Annual Report, Exhibit B (May 2013)). An opt-out "program" targeted to non-residential customers could result in a significant reduction in customer participation and energy efficiency impacts and threaten the viability of these programs. (Tr. 591). The opportunity to opt-out would make it difficult for MEC to project or establish reliable savings goals. (Tr. 591). A significant reduction in eligible large commercial and industrial customers would likely reduce MEC's achievable potential and energy efficiency savings goals. In light of Iowa's long-standing energy efficiency policy, the Board should refuse ICEE's undefined opt-out proposal that could jeopardize the viability of future energy efficiency programming efforts.

Absent legislative authorization for energy efficiency opt-out, the energy efficiency contested case review is the most appropriate proceeding for determining whether ICEE's proposal is consistent with Iowa energy efficiency policy. An important component of the energy efficiency contested case review is to consider alternative program proposals so that underlying assumptions can be fully investigated and tested in relation to the utility's assessment of energy efficiency potential and proposed energy efficiency programs. ICEE put forward no criteria or energy efficiency standards for opt-out eligibility. As such, it is impossible to assess the credibility of ICEE's claim that an opt-out program is warranted or to estimate the impact of an opt-out program on MEC's energy efficiency program. OCA witness Bodine recommended against relying on opt-out provisions from other states as a justification for IECC's opt-out proposal, particularly when most of the examples relied upon by Mr. Brubaker (Tr. 899; Ex. MEB-2) are from states that rank poorly in overall energy efficiency policies. (Tr. 591). This stands in contrast to Iowa's well-regarded and long-standing energy efficiency policy. (Tr. 592).

ICEE witness Brubaker places undue reliance on MEC's assessment of potential, asserting that it shows the greatest opportunities for achieving additional energy efficiency exist in with the residential and commercial sectors. (Tr. 896). The more important conclusion to be drawn from MEC's assessment of potential is that the industrial sector continues to offer an important source of cost-effective economic energy efficiency potential. As pointed out by OCA witness Bodine, the industrial technical potential reflects 26 percent of Iowa's total technical potential and 28 percent of Iowa's total economic potential. (Tr. 592).

ICEE witness Brubaker asserts that it is problematic to assign energy efficiency program costs to customers who have invested substantial resources in energy efficiency improvements, are already efficient, and cannot benefit from program participation. (Tr. 895). This claim holds little weight given that ICEE offers no evidence of these circumstances being faced by its individual coalition members. ICEE offers no analysis of the number or percentage of MEC's individual industrial customers who have invested substantial resources in energy efficiency, are already energy efficient, and who cannot benefit from program participation. There is inadequate justification for incorporating opt-out in MEC's plan or using this proceeding as the basis for opening up a rulemaking to explore ICEE's proposal.

2. Industrial Opt-Out is Inequitable and Would Jeopardize Energy Efficiency Programming

ICEE witness Brubaker contends that subsidies arise when industrial customers that have invested substantial resources in efficiency improvements are required to contribute toward energy efficiency program funding that can be used to improve the efficiency of other industrial customers. (Tr. 898). This view fails to recognize that energy efficiency programs are established for the benefit of all utility customer classes. Because the benefits are shared, it is appropriate for all customers to help pay for the associated costs. (Tr. 589-590). It is inequitable to create an opt-out feature for customers who may have taken advantage of these program funds to become more efficient and realize long-term energy savings, particularly when ongoing funding of the programs is needed to serve other customers with significant efficiency opportunities. The purpose of the programs is to support ongoing, cost-effective energy efficiency investments, which typically deliver long-term energy savings. (Tr. 590).

Witness Bodine cautioned that if opt-out is available to customers who have invested in efficiency and have very limited program participation options, as implied by Mr. Brubaker's testimony, this would lead to extensive levels of opt-out and therefore likely mark the end of the MEC's successful energy efficiency programs or greatly diminish the effectiveness of these energy efficiency programs. (Tr. 591). The creation of opt-out for a limited class of customers is not an appropriate solution to this problem as such special treatment would be inequitable. There is no sound or just reason for limiting the availability of program opt-out to certain types of customers. If there is to be an exemption from this state legislative policy, it must be declared by the Iowa legislature.

It is further unfair and contrary to Iowa energy efficiency policy to allow an opt-out customer to participate in the interruptible discount program that resides in MEC's energy efficiency portfolio. If a customer ceases funding energy efficiency programs, the customer should not be eligible to selectively participate in MEC's interruptible discount program. (Tr. 590).

B. Whether MEC Should Be Ordered To Track Non-Residential Energy Efficiency Expenditures By Rate Class As Well As By Program. [Issue 17].

ICEE witness Brubaker proposed that MEC track nonresidential energy efficiency program expenditures separately by rate schedule. (Tr. 909). Mr. Brubaker asserts that tracking each non-residential EE program expenditure by rate class would provide important information about which customers are receiving the EE services. While OCA is not opposed to providing customers useful information about their utility service, OCA witness Bodine expressed concern that this type of information would be misconstrued and inappropriately used to justify an opt-out program or individual customer opt-out (Tr. 594-595). Even though MEC has agreed to track energy efficiency expenditures by rate class as well as program, MEC witness Rea agreed that the tracking of this information should not necessarily control the allocation of costs and development of energy efficiency cost recovery factors, and further agreed that opt-out determinations, if available, should be guided by more nuanced considerations. (Tr. 281).

C. Whether MidAmerican Should Revise Its Large General Service EECR Factor To A Two-Part EECR Factor With A Separate Demand Factor For Recovery Of Costs Associated With Load Management Programs And An Energy-Based Factor For All Other Eligible Energy Efficiency Costs. [Issue 18].

MidAmerican and ICEE reached agreement to implement the separate demand factor for recovery of load management programs. OCA did not join in the settlement of this issue and stands by its objections to this outcome. In accordance with established rate design policy, OCA witness Bodine advocated that a thorough review of customer impacts be undertaken prior to implementing such change. He further explained that the current allocation of energy efficiency costs via a kWh charge encourages energy efficiency and thereby advances energy efficiency policy. (Tr. 594). This is also generally consistent with the approach specified in 199 IAC 35.12(3), which calls for ECR factors to use the same unit of measurement as the utility's tariff rates.

D. Whether MEC's Energy Efficiency Portfolio Should Address Renewable Energy Options Through Education Or Incentives. [Issue 24].

Citing the recent positive direction and high customer interest in IPL's Renewable Energy pilot program, OCA witness Kebede recommended that MidAmerican also offer programming to address its customers' interest in renewable energy opportunities. (Tr. 573-574). A renewable program helps meet customer interest in renewable energy while advancing classic energy efficiency opportunities. In addition to offering a buy-down incentive, IPL's pilot is designed to educate customers about the benefits costs and benefits of energy efficiency options, including renewable energy, and to assure that customers receive high quality technical assistance in assessing and moving forward with renewable energy projects.

The Board accepted IPL's argument that renewable technologies met applicable criteria to be included in the utility's energy efficiency portfolio:

> The Board finds no precise definition of energy efficiency in Iowa Code chapter 476. The Board can discern no difference between the use of renewable technologies and classic energy efficiency measures when those activities take place on the customers' side of the meter. As do classic energy efficiency measures, the use of renewable technologies reduces a customers' demand and energy use from the utility.[5]

Like classic energy efficiency measures, the reduction in customer demand and energy use from the utility resulting from customer implementation of renewable energy technologies is beneficial to the utility and its ratepayers because the reduced or displaced energy consumption

[5] *Interstate Power and Light Co.*, Docket No. EEP-08-1, "Final Order," p. 11 (IUB, June 24, 2009).

from the utility is now available to meet other retail customer needs or to be sold in the wholesale energy market. (Tr. 84). These conclusions are consistent with Iowa public policy, which seeks to promote energy efficiency and renewable energy as priority resources in order to reduce Iowa's reliance on energy production from non-renewable energy resources. Iowa Code §§ 476.41, 473.3, 266.39C (2013). The matter of whether renewable energy satisfies applicable criteria for inclusion in energy efficiency plan portfolios was litigated and determined in IPL's current plan.

MEC did not consider benefit-cost analysis in its decision not to offer a renewable program in its energy efficiency portfolio. (Tr. 183). The benefit to ratepayers and the utility is demonstrated in the ratepayer impact and utility benefit-cost ratios reflected in IPL's most recent renewable portfolio results. (Tr. 183). MEC witness Rea explained that the Utility Cost Test (UCT) is the most appropriate test to use if one wants to specifically determine whether rates will be lower in the long term by implementing or not implementing certain energy efficiency measures and programs. (Tr. 264).

Despite the shared characteristics of energy efficiency and renewable energy, MidAmerican does not wish to promote renewable energy through its energy efficiency portfolio. (Tr. 132). Witness Yoder states that while "MidAmerican supports the development of renewable generation, we believe there are other more appropriate mechanisms and ways to support education and expansion of renewable generation, but that they are not properly a part of this portfolio." (Tr. 132). OCA witness Kebede pointed out the importance of providing at least a renewable energy education component as part of MEC's energy efficiency portfolio in order to help meet burgeoning customer interest in renewable energy and guide these customers to first consider energy efficiency. (Tr. 574). OCA is encouraged by MEC's willingness, as indicated by witness Czachura, to provide this renewable information on its website, to expand the information currently provided by taking a more educational based approach, and to locate it in a way that would be easily accessible by interested consumers. (Tr. 92). As there is no clear regulatory opportunity to review the efficacy of such improvements, it is important that renewable energy education be evaluated in energy efficiency proceedings.

CONCLUSION

Wherefore, the OCA requests the Board fully consider the foregoing in evaluating IPL's proposed energy efficiency plan for 2014-2018, the Settlement Agreement, and the remaining contested or unsettled issues.

Respectfully submitted,

Mark R. Schuling
Consumer Advocate

/s/ Jennifer C. Easler
Jennifer C. Easler
Attorney

1375 East Court Avenue, Room 63
Des Moines, Iowa 50319-0063
Telephone: (515) 725-7200
E-mail: IowaOCA@oca.iowa.gov

OFFICE OF CONSUMER ADVOCATE