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Executive Secretary
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IOWA UTILITIES BOARD
FCU-2014-0016**

ARTI CROSS EXHIBIT 3

(Public Version)

Arti, LLC
Data Request
Docket No. FCU-2014-0016

Date: August 12, 2015

Witness: Naomi G. Czachura

Reference: Rebuttal testimony, p. 3, lines 45-47, 50-54; p. 4, lines 65-68

Responder Name: Naomi Czachura

Job Title: Vice President Rates and Regulatory Strategy

Phone: (563) 333-8869

With respect to the testimony cited above:

63.

- a. Identify each and every internal MidAmerican Energy document that establishes or references the policies/interpretations stated at the reference locations cited in the heading of this data request, state the date each identified documents was created, and produce a copy of each such document.
- b. Explain how those policies/interpretations were developed.
- c. Explain why those policies/interpretation are not explicitly stated in MidAmerican Energy's Iowa electric tariff.
- d. When and in what manner did MidAmerican Energy first inform Arti of those policies/interpretations?
- e. Identify and produce a copy of each and every document MidAmerican Energy provided to Arti informing Arti of those policies/interpretations, state the date on which the identified document was provided to Arti, and produce a copy of each such document.
- f. Identify each and every externally available document informing the public in general, or MidAmerican Energy's actual or potential customers in particular, of those policies/interpretations, state the date on which the identified document became externally available, and produce a copy of each such document.

Response:

- a. MidAmerican's tariffs, including [REDACTED], all specify that the rates are to be applied per meter. These tariffs establish MidAmerican's general policy. While MidAmerican has no official written policy on exceptions to this default policy, MidAmerican has consistently considered them on a case-by-case basis if the facilities served are electrically connected and the additional meter(s) were placed based on MidAmerican's design for MidAmerican's convenience.
- b. These policies have been in existence for some time and MidAmerican has no specific record of how they were developed other than what was outlined in Ms. Czachura's reply testimony regarding the practical implication of not having a single transformer and meter large enough to accommodate the load. In MidAmerican's recent rate filing, the specification that charges should be made per meter was included because typically each metering point results in additional costs to MidAmerican.
- c. As noted above, MidAmerican's general policy is stated in the tariff. Any exceptions that are made must consider the specific customer circumstances. It would be impossible to include all potential situations that might result in an exception in the tariff.
- d. MidAmerican does not have a recollection that this issue was discussed. As noted above MidAmerican's general policy is stated in the tariff.
- e. See response to 63 d.
- f. As noted above, and in the response to data request number 7, MidAmerican's general policy is articulated in its tariffs.