

March 18, 2016

IOWA UTILITIES BOARD

STATE OF IOWA
DEPARTMENT OF COMMERCE
BEFORE THE IOWA UTILITIES BOARD

IN RE: INTERSTATE POWER AND LIGHT COMPANY	DOCKET NO. TF-2016-0015
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STATEMENT OF POSITION

The Office of Consumer Advocate (“OCA”), a division of the Iowa Department of Justice, responds as follows to the energy efficiency cost recovery reconciliation filed by Interstate Power and Light Company (“IPL”) in the above-captioned matter on February 29, 2016.

Based on its review of the instant filing, OCA concludes that IPL’s proposed cost recovery factors accurately reflect budgeted energy efficiency expenditures for the applicable period, including a true up or reconciliation of reported actual 2015 expenditures. Although the proposed cost recovery factors are mathematically sound according to these criteria, it appears that IPL’s actual 2015 residential electric energy efficiency expenditures deviate from budgeted 2015 expenditures to such an extent as to trigger plan modification requirements under 199 IAC 35.6(4)(a).

OCA does not object to the implementation of the proposed cost recovery factors, but OCA reserves its right to investigate actual 2015 plan expenditures and performance based on future filings in order to evaluate program implementation and prudence and, if appropriate, make recommendations concerning the need for potential plan modification or request for a waiver of the requirements of 199 IAC 35.6(4)(a). Should plan modification be warranted, it

may be necessary to revise IPL's energy efficiency cost recovery factors.

Respectfully submitted,

Mark R. Schuling
Consumer Advocate

/s/ Anna K. Ryon

Anna K. Ryon
Attorney

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

OFFICE OF CONSUMER ADVOCATE