

OFFICE OF CONSUMER ADVOCATE

DIRECT TESTIMONY

OF

KEVA HIBBERT, Ph.D.

**IN RE: OFFICE OF CONSUMER ADVOCATE v.
INTERSTATE POWER AND LIGHT COMPANY
DOCKET NO. FCU-2016-0011**

November 14, 2016

1 **Q: Please state your name, occupation and business address.**

2 A: Keva Hibbert, 1375 East Court Avenue, Des Moines, Iowa 50319.

3 **Q: By whom are you employed and in what capacity?**

4 A: I am currently employed as a Utility Analyst in the Office of the Consumer
5 Advocate (OCA), a division of the Iowa Department of Justice.

6 **Q: Please explain your educational background and your work experience.**

7 A: I received a Doctor of Philosophy (Ph.D.) in Economics in 2011 from the State
8 University of New York at Binghamton (SUNY-Binghamton). I was an
9 Assistant Professor of Economics at Augustana College in Rock Island, Illinois,
10 between August 2011 and May 2012, and at Western Illinois University
11 between August 2012 and August 2016. During my time as an Assistant
12 Professor, I conducted research on Energy Policy matters, focusing on the
13 relationship between energy consumption and economic growth, and electricity
14 theft. I have also taught courses in Environmental Economics and
15 Environmental Policy.

16 Between February 2005 and July 2006, I was employed as an Energy
17 Economist in the Energy Division of the Ministry of Energy, Science and
18 Technology¹ in Kingston, Jamaica. During this time, I was part of a team that
19 drafted policy papers on biofuels, energy policy, and energy efficiency. I
20 attended regional conferences that focused on issues such as carbon emission
21 trading and Caribbean energy policy. I also participated in workshops

¹ During the time I was employed, this was known as the Ministry of Science, Technology, Energy and Commerce.

1 sponsored by the Latin American Energy Organization (OLADE) and was a
2 contributor to the annual National Energy Statistics publication in Jamaica.

3 I also have a Bachelor of Science degree in Actuarial Science (*Hons*)
4 and a Master of Science degree in Economics from the University of the West
5 Indies, Kingston, Jamaica.

6 **Q: Is IPL required to provide reasonably adequate service at rates and**
7 **charges in accordance with tariffs filed with the IUB?**

8 A: Yes. As made clear by the Iowa Code Section 476.3(1) (2015), “A public utility
9 shall furnish reasonably adequate service at rates and charges in accordance
10 with tariffs filed with the Board.”

11 **Q: What is the purpose of your testimony?**

12 A: The purpose of my testimony is to provide evidence that Interstate Power and
13 Light Company (IPL) did not provide reasonably adequate service. I will refer
14 specifically to instances, in relation to recent customer complaints about
15 estimated billing and true-ups for IPL’s electric billing, where IPL was non-
16 compliant with Iowa Utilities Board (Board) rules 199 IAC Chapter 20.

17 **Q: Are there Board rules that address how electricity sold by a utility should**
18 **be measured?**

19 A: Yes. Board rule 199 IAC 20.3(1)(a) states that “All electricity sold by a utility
20 shall be on the basis of meter measurement except: (1) where the consumption
21 of electricity may be readily computed without metering; or (2) for temporary
22 service installations.”

1 **Q. Has IPL been compliant with this requirement?**

2 A: No. The Board has received numerous complaints from IPL customers about
3 multiple estimated electric bills followed by significantly higher true-ups. In
4 response to these complaints, IPL has confirmed that estimated bills were
5 generated and issued. IPL has also stated, in supplemental response to OCA's
6 Data Request No. 4, that customers received 376,942 estimated bills between
7 April 1, 2015 and October 31, 2016, with 233,809 issued between February 15,
8 2016 and October 31, 2016. (*See* OCA Exhibit Turner Direct, Schedule A,
9 pp. 28-30). The electricity sold, in these cases, was not on the basis of meter
10 measurement, but on the basis of estimated energy use.

11 **Q: Why is the date February 15, 2016 important?**

12 A: On February 15, 2016, IPL launched its Customer Care and Billing (CC&B)
13 system.

14 **Q: Under what circumstances does IPL issue estimated bills to customers?**

15 A: According to IPL's response to OCA's Data Request No. 10, bills for residential
16 customers are estimated if the meter is unread, or if bills that have actual reads
17 but selected for review are not resolved before the close of the billing window.
18 (*See* OCA Exhibit Turner Direct, Schedule A, pp. 50-51).

19 **Q: Were IPL customers issued estimated bills under any of these**
20 **circumstances during the recent estimated billing issue?**

21 A: Yes. IPL issued estimated electric bills to customers because of the
22 circumstances outlined in the answer to the previous question.

1 **Q: Were IPL customers issued estimated bills under any other circumstances**
2 **during the recent estimated billing issue?**

3 A: Yes. A system patch to IPL's new CC&B system inadvertently determined that
4 some accurate actual reads were invalid, so an estimated bill was sent instead.
5 These actual reads were not selected for manual review.

6 **Q: Are there Board rules that address how often a meter should be read?**

7 A: Yes. Board rule 199 IAC 20.3(6) states that "Readings of all meters used for
8 determining charges and billings to customers shall be scheduled at least
9 monthly and for the beginning and termination of service."

10 **Q: Have there been cases where customers' electric meters have not been read**
11 **at least once per month?**

12 A: Yes. IPL's responses to customer complaints C-2016-0234, C-2016-0239, C-
13 2016-0240, C-2016-0323, C-2016-0326, C-2016-0339, C-2016-0346, and C-
14 2016-0354 provide examples of numerous instances of no meter reading for at
15 least one month.

16 **Q: Has IPL provided any reasons for why some customers' meters were not**
17 **read in a particular month?**

18 A: Yes. In response to OCA Data Request No. 10, IPL indicated that the meter can
19 be unread because of inclement weather, inaccessibility of the meter, or
20 limitation on meter reader resource availability. (See OCA Exhibit Turner
21 Direct, Schedule A, pp. 50-51).

22 **Q: Which of the reasons, provided in the answer to the previous question,**

1 **stood out as the basis for unread meters during this estimated billing issue?**

2 A: In response to several customer complaints (C-2016-0234, C-2016-0239, C-
3 2016-0240, C-2016-0323, C-2016-0326, C-2016-0339, C-2016-0346, and C-
4 2016-0354), IPL stated that shortage of meter reading staff was the main reason
5 for the absence of a meter reading.

6 **Q: How many bills were estimated due to an absent meter reading?**

7 A: Based on IPL's supplemental responses to OCA's Data Requests No. 4 and
8 No. 28, IPL issued 236,445 estimated bills due to the absence of a meter reading
9 between April 1, 2015 and October 31, 2016. Between February 15, 2016 and
10 October 31, 2016, IPL issued 93,312 estimated bills due to the absence of a
11 meter reading. (See OCA Exhibit Turner Direct, Schedule A, pp. 28-30; p. 82).

12 **Q: Are there Board rules that address when an estimated bill can be issued?**

13 A: Yes. Board rule 199 IAC 20.3(6) also states that "If an actual meter reading
14 cannot be obtained, the utility may render an estimated bill without reading the
15 meter or supplying a meter reading form to the customer."

16 **Q: Were there instances where IPL issued an estimated bill even though an
17 actual meter reading was obtained?**

18 A: Yes. In numerous instances, IPL obtained actual usage from customers' electric
19 meters but issued estimated bills instead. Based on supplemental response to
20 OCA's Data Request No. 5, IPL states that there are two reasons this happened:
21 one is due to a process in which billing staff reviews actual bills that are flagged
22 for manual review, but is unable to complete the review before the billing

1 window is closed. (*See* OCA Exhibit Turner Direct, Schedule A, pp. 35-39).

2 The other reason is due to a fault in a system patch, which inadvertently closed
3 actual bills, resulting in them being sent as estimated bills instead.

4 **Q: How many actual meter readings were selected for review?**

5 A: Between February 15, 2016 and October 31, 2016, 121,923 actual meter
6 readings were selected for review. Of that number, 69,346 were selected for
7 manual review, while 52,283 were selected for a system review. (*See* OCA
8 Exhibit Turner Direct, Schedule A, p. 37). IPL has indicated that this
9 information is not available for its previous billing system.

10 **Q: How many customers received estimated bills despite IPL obtaining actual**
11 **meter readings?**

12 A: Between February 15, 2016 and October 31, 2016, IPL issued 50,433 estimated
13 bills due to unresolved manual reviews of actual readings, and 46,591 estimated
14 bills due to a system patch fault. (*See* OCA Exhibit Turner Direct, Schedule A,
15 p. 37). In total, 97,024 estimated bills were sent out despite IPL obtaining
16 actual usage.

17 **Q: Did the review process affect the number of times estimated bills were**
18 **issued?**

19 A: In many cases where more than one estimated bill was issued in a row, it was
20 due to an unresolved manual review of an actual reading. (*See* complaints C-
21 2016-0305, C-2016-0369, C-2016-0418, C-2016-0420, and C-2016-0509).

22 **Q: Were customers aware that they were receiving estimated bills because the**

1 **manual review of their actual usage was not completed?**

2 A: No. In response to OCA’s Data Request No. 7, IPL indicated that customers
3 were not notified when their bills have been selected for manual review. (*See*
4 OCA Exhibit Turner Direct, Schedule A, p. 44).

5 **Q: Are there Board rules that address how promptly customers should receive**
6 **bills following the reading of their meters?**

7 A: Yes. Board rule 199 IAC 20.4(9) states that “Each customer shall be informed
8 as promptly as possible following the reading of the customer’s meter, on bill
9 form or otherwise, of the following:

- 10 a. The reading of the meter at the beginning and at the
- 11 end of the period for which the bill is rendered.
- 12 b. The dates on which the meter was read, at the
- 13 beginning and end of the billing period.
- 14 c. The number and kind of units metered.

15 **Q: Was IPL in compliance with Board rule 199 IAC 20.4(9)?**

16 A: No. Many customers did not receive prompt notice of their electric usage.
17 Instead, they received estimated bills even though actual usage information was
18 available. This is because IPL’s CC&B system is designed to automatically
19 send an estimated bill if the meter read falls outside of the pre-determined
20 range, and the flagged bill is not manually reviewed before the billing window
21 closes, as stated in IPL’s response to OCA’s Data Request No. 6. (*See* OCA
22 Exhibit Turner Direct, Schedule A, pp. 40-43). Examples of this can be found
23 in IPL’s responses to the following complaints: C-2016-0136, C-2016-0164, C-
24 2016-0260, C-2016-0334, and C-2016-0340.

1 It also appears that some customers who moved into new construction
 2 homes and established electric service with IPL had their accounts flagged for
 3 manual review because they did not have historical usage. In response to
 4 complaints C-2016-0113 and C-2016-0283, IPL stated that because the home
 5 was new construction and there was no historical usage, the account was
 6 flagged for manual review. As a result, the customer was issued an estimated
 7 bill because the manual review was unresolved by the time the actual bill was
 8 due to be issued.

9 **Q: In what other ways did the lack of prompt notice of electric usage adversely**
 10 **affect customers?**

11 A: Customers were not given the opportunity to change their behavior in response
 12 to electric usage information. Instead, because most of the usage was
 13 significantly underestimated, customers were not aware of their increased
 14 electric consumption during the estimated billing periods. In many cases,
 15 customers were not aware of their actual usage until three months later.
 16 Customers only became aware of their actual usage once they received true-up
 17 bills. Late notice to customers in the form of true-up bills contributed to the
 18 immense number of customer complaints regarding this situation.

19 **Q: In cases where customers initially received estimated bills for electric**
 20 **usage, how did IPL subsequently notify customers of their actual usage or**
 21 **true-up amounts?**

22 A: Based on responses to customer complaints, IPL utilized multiple methods to

1 inform customers of actual usage and true-up amounts.

2 1. IPL issued bills to customers with corrections for the periods where they
3 had actual readings but sent estimated bills instead. The corrections table
4 on the bill typically describes the difference between the estimated bill
5 amount and the actual bill amount but does not disclose usage
6 information. Some examples are included in C-2016-0210, C-2016-
7 0230, C-2016-0283, C-2016-0305, and C-2016-0351.

8 2. IPL issued replacement bills of actual electric usage to customers for
9 periods previously estimated. Typically, these replacement bills are
10 issued on the same day and have the same due date, although the bill with
11 the highest amount reflects the amount owed. Some examples are
12 included in C-2016-0170, C-2016-0264, C-2016-0377, C-2016-0418, and
13 C-2016-0420. This strategy utilized by IPL created confusion for the
14 customer because the customer had already received an estimated bill for
15 that period.

16 **Q: What logic does IPL use to determine its estimated bills?**

17 A: IPL's new CC&B system uses a three-step estimation logic to determine
18 estimated billing. The average daily usage from the same month of the prior
19 year is used. If this is not available, the average daily usage from the prior
20 month is used. If this is not available, then historical trends of customers in
21 similar geographical location is used. (See OCA Exhibit Turner Direct,
22 Schedule A, p. 47).

1 **Q: How does IPL apply its estimated billing logic?**

2 A: Based on IPL's logic, estimation is based primarily on historical consumption
 3 by the customer. There are two ways in which IPL uses historical consumption:
 4 if available, IPL will use the customer's consumption from the same month of
 5 the prior year to estimate current consumption. However, a customer's actual
 6 usage can vary significantly from prior usage if there is a substantial difference
 7 in the weather, since weather is a significant determinant of energy use. If same
 8 month of the prior year consumption information is not available, IPL uses the
 9 prior month consumption. This is also problematic because high energy use
 10 appliances, such as an air conditioner unit or a dehumidifier, are heavily used in
 11 June but not in May. IPL's estimation logic does not currently address these
 12 possibilities. In addition, if an IPL customer does not have prior usage, then
 13 historical trends of customers in a similar geographical location is used instead.
 14 This method is also problematic since it does not take into account the
 15 differences in factors that can affect energy use, such as housing characteristics.

16 **Q: How did IPL's use of historical consumption contribute to the current**
 17 **estimated billing issue?**

18 A: IPL asserts that the summer of 2016 was warmer than the summer of 2015.
 19 (See OCA Exhibit Turner Direct, Schedules D and E). If the customer's bill
 20 was based on the same month of the prior year, it would be underestimated
 21 because weather is a significant determinant of energy use and IPL made no
 22 adjustments in its estimates for weather differences. IPL used a large number of

1 estimates in the summer of 2016 based on the summer of 2015. As the
2 complaints indicate, a significant number of customers received low estimates
3 based on the prior year that resulted in large true-ups. If more than one month
4 was estimated in a row, the true-up escalated.

5 If the customer's estimated bill was based on the prior month, the
6 estimate becomes problematic if you are entering into a season with high use
7 energy appliances. Many of the estimates occurred in the transition from spring
8 to summer and IPL made no adjustments for an increase in the use of air
9 conditioning. IPL used a large number of estimates in the summer of 2016
10 based on the prior month. As the complaints indicate, a significant number of
11 customers received low estimates based on the prior month that resulted in large
12 true-ups. If more than one month was estimated in a row, the true-up escalated.

13 **Q: Are there Board rules that address how many estimated bills a customer**
14 **can receive in a row?**

15 A: Yes. Board rule 199 IAC 20.3(6) also states that "Only in unusual cases or
16 when approval is obtained from the customer shall more than three consecutive
17 estimated bills be rendered."

18 **Q: Is there evidence that IPL customers received more than three estimated**
19 **bills in a row?**

20 A: Yes. In both IPL's response and supplemental response to OCA's Data Request
21 No. 4, IPL stated that 913 customers received more than three estimated bills
22 during the period April 1, 2015 to February 15, 2016. (See OCA Exhibit Turner

1 Direct, Schedule A, pp. 26-30). One example of this can be found in IPL's
2 response to complaint C-2016-0229, where the customer received five estimated
3 bills in a row for the periods July, August, September, October, and November,
4 2015.

5 **Q: Is there evidence that any customer received more than three estimated**
6 **bills in a row after February 15, 2016?**

7 A: Yes. According to IPL's response to complaint C-2016-0349, the customer was
8 issued five estimated bills in a row. Specifically, the customer received
9 estimated bills for April, May, June, July and August in 2016.

10 **Q: Did IPL provide an explanation for why the customer received more than**
11 **three estimated bills in a row?**

12 A: Yes. In response to the customer's complaint, IPL stated that their billing
13 system mistakenly identified the customer's July reading as an "office estimate"
14 which explains why the customer received a fourth estimated bill.
15 Subsequently, the customer also received a fifth estimated bill which was issued
16 in August.

17 **Q: How did receiving more than three estimated bills affect the customer's**
18 **ability to pay?**

19 A: On July 18, 2016, the customer was issued a bill that showed true-up amounts
20 for the April, May, and June bills, and an estimated amount for the July bill. In
21 response, the customer entered into a payment arrangement which begins with
22 the bill issued on August 16, 2016. Since customer's July and August bills were

1 also estimated, another true-up bill was issued on September 16, 2016. Based
2 on IPL's response to the customer's complaint, the customer contacted IPL on
3 September 20, 2016 to enter into a second payment arrangement with IPL to
4 spread out charges owed over a six month period.

5 **Q: Are there any other instances of customers receiving more than three**
6 **estimated bills in a row after February 15, 2016?**

7 A: I am not aware of any other instance of customers receiving more than three
8 estimated bills in a row after February 15, 2016.

9 **Q: In any of the cases presented above, is it your opinion that these cases were**
10 **unusual or was approval obtained by the customer to issue more than three**
11 **estimated bills in a row?**

12 A: In my opinion, there was no unusual occurrence that would require an estimated
13 bill to be issued more than three times in a row. I have no evidence that
14 customer approval was granted for estimated bills to be issued three times in a
15 row.

16 **Q: Is IPL in compliance with Board rule 199 IAC 20.3(6)?**

17 A: No. In many cases, IPL did not provide enough staff to read meters, resulting in
18 estimated billing. IPL also sent more than three estimated bills in a row to some
19 customers without reasonable justification. Finally, IPL issued estimated
20 electric bills to customers despite having actual electric usage for these
21 customers. It is apparent that IPL has violated Board rule 199 IAC 20.3(6).

22 **Q: Were there cases where customers received more than one estimated bill in**

1 **a row?**

2 A: Yes. IPL's supplemental response to OCA's Data Request No. 4 states that
3 28,956 customers received two estimated bills in a row between April 1, 2015
4 and October 31, 2016, and 18,742 customers received three estimated bills in a
5 row between April 1, 2015 and September 30, 2016. (See OCA Exhibit Turner
6 Direct, Schedule A, pp. 28-30).

7 **Q: Can you provide an example of how receiving more than one estimated**
8 **bills has affected customers' ability to pay?**

9 A: Yes. According to complaint C-2016-0331, the customer received three
10 estimated bills in a row for usage in May, June and July of 2016. The customer
11 received a true-up bill on September 27, 2016 in the amount of \$381.19. In
12 addition, the customer was billed for actual usage for August in the amount of
13 \$306.49. Three days later, on September 30, 2016, the customer was issued
14 another bill which included the balance of \$687.68 brought forward from the
15 September 27 bill, and a current bill of \$203.57 for September usage. In total,
16 the customer's September 30, 2016 bill was for a total of \$891.25.

17 **Q: Did the customer have a balance brought forward prior to the issued**
18 **September 30, 2016 bill?**

19 A: No. Between bills issued from April 29, 2015 to September 27, 2016, the
20 customer paid all IPL bills in full.

21 **Q: Has the customer indicated how she intends to pay for the \$891.25 balance?**

22 A: Yes. In a follow up complaint to IPL's response, the customer mentioned that

1 she has entered into a payment agreement with IPL to pay the \$891.25 balance
2 owed to IPL.

3 **Q: Do you believe that this incident has inflicted any hardship on the**
4 **customer?**

5 A: Yes. In the customer's initial complaint, it was indicated that the customer was
6 a college student who works full-time. In addition, prior to receiving the
7 September 27 bill, the customer's maximum billing amount between April 2015
8 and August 2016 is \$104.99.

9 **Q: Are there other cases of customers who received more than one estimated**
10 **bill in a row?**

11 A: Yes. There are numerous instances of customers who have received three
12 estimated bills in a row. Based on IPL's responses to customer complaints,
13 some other examples are included in C-2016-0136, C-2016-0150, C-2016-0159,
14 C-2016-0173, C-2016-0257, C-2016-0258, C-2016-0260, and C-2016-0264.

15 **Q: Are you of the opinion that more than one estimated bill in a row caused**
16 **significant financial stress on customers who received these bills?**

17 A: Yes. In numerous instances, customers estimated electric usage was
18 significantly below actual electric usage. This gave customers a false
19 impression about their electric consumption. In some cases, customers did not
20 seem aware that the bills they were receiving were based on estimated usage,
21 although this is marked on the bill. As a result, customers expressed surprise,
22 shock, and outrage at the true-up billing amounts. Because the amounts were

1 much higher than expected, customers were not financially prepared to pay and
2 in some cases, entered into alternate payment arrangements with IPL. IPL's
3 responses to C-2016-0180 and C-2016-0369 provide some examples of this.

4 **Q: Did customers try to contact IPL regarding the estimated billing issue?**

5 A: Yes. Numerous customers tried to contact IPL regarding the estimated billing
6 issue.

7 **Q: Did IPL customers complain about poor customer service when they called
8 to inquire about their billing amounts?**

9 A: Yes. In some cases, customers complained about very long wait times to
10 connect to customer service. At least two customers (C-2016-0173 and C-2016-
11 0557) complained about feeling threatened with disconnection, or feeling
12 pressured to enter into a level payment plan agreement, which is colloquially
13 known as budget-billing, to avoid disconnection. Another customer (C-2016-
14 0351) complained about being receiving rude customer service.

15 **Q: Can you provide examples of customer complaints about long wait times?**

16 A: Yes. Customer complaints C-2016-0134, C-2016-0196, C-2016-0330, C-2016-
17 0340, and C-2016-0354 all indicated that they had wait times between 25
18 minutes to an hour.

19 **Q: Are there Board rules that address the quality of customer service that
20 should be provided to customers?**

21 A: Yes. Board rule 199 IAC 20.4(2) states that "Each utility shall promptly and
22 courteously resolve inquiries for information or complaints."

1 **Q: Was IPL in compliance with this Board rule?**

2 A: No. Based on evidence presented above, customers' complaints were not
3 resolved promptly. In some complaints, customers also complained about the
4 poor attitude of the customer service representatives.

5 **Q: Did a lack of staffing resources contribute to the estimated billing issue that**
6 **affected customers?**

7 A: Yes. IPL issued estimated bills because of three primary reasons: insufficient
8 meter readings, incomplete manual reviews, and a faulty system patch. The
9 lack of sufficient meter readers resulted in insufficient meter readings, while the
10 shortage of billing staff resulted in incomplete manual reviews. In addition, IPL
11 could not adequately address customer complaints because there was also a
12 shortage in customer service call center staff. This staff shortage is within the
13 control of IPL and not a fault of the customer. If IPL was sufficiently staffed,
14 the number of estimated bills would be significantly reduced.

15 **Q: What does Board rule 199 IAC 20.4(11) state about reasonableness of**
16 **payment agreements?**

17 A: Board rule 199 IAC 20.4(11)(a) specifically states that “[a] utility shall offer the
18 customer an opportunity to enter into a reasonable payment agreement.” Board
19 rule 199 IAC 20.4(11)(b) states “Whether a payment agreement is reasonable
20 will be determined by considering the current household income, ability to pay,
21 payment history including prior defaults on similar agreements, the size of the
22 bill, the amount of time and the reasons why the bill has been outstanding, and

1 any special circumstances creating extreme hardships within the household....”

2 **Q: Did customers complain about the reasonableness of payment agreements**
3 **to which they were a party?**

4 A: Yes. Customers who entered into payment agreements complained about the
5 financial hardships that they will now face because of the additional amount to
6 be paid, in addition to their current bill amount. (*See* complaints C-2016-0136,
7 C-2016-0173).

8 **Q: Were there level payment plan customers that experienced increases in**
9 **their budget billing amount because of a true-up bill that was previously**
10 **underestimated?**

11 A: I did not identify any direct link between level payment plan changes and large
12 true-up billing amounts. However, in response to OCA’s Data Request No. 21,
13 the number of customer complaints about increased budget billing amounts
14 increased significantly since the implementation of IPL’s new billing system.
15 (*See* OCA Exhibit Turner Direct, Schedule A, pp. 72-73). Between April 1,
16 2015 and January 31, 2016, the number of customer complaints about increased
17 budget billing ranged between zero and two per month. Between February 1,
18 2016 and October 31, 2016, the number of complaints about budget billing
19 ranged between four and nineteen per month.

20 **Q: Based on the evidence presented above, did IPL provide reasonably**
21 **adequate service at rates and charges in accordance with tariffs filed with**
22 **the IUB?**

1 A: No. IPL did not provide reasonably adequate service. As a result of multiple
2 estimated bills during a period when customers' actual electric usage was higher
3 than expected, customers were financially challenged to meet their payment
4 obligations when they received true-up bills. This is not the service that IPL
5 agreed to provide and it is not the service that customers expect from their
6 utility company. Based on the evidence presented in this testimony, IPL has
7 been non-compliant with Board rules 199 IAC 20.3(1), 20.3(6), 20.4(2), and
8 20.4(9).

9 **Q: What is your recommendation to the Board?**

10 A: I recommend that customers who have true-ups that are in excess of 10 percent
11 of their average 12-month billing amounts should be given no less than 18
12 months, but no more than 24 months to settle their balances. In addition, it is in
13 my opinion that a staff shortage is not outside of the control of IPL and should
14 not be treated as such in the determination of whether or not IPL was within
15 reason to issue estimated bills.

16 **Q: Does this conclude your testimony?**

17 A: Yes, it does.

STATE OF IOWA)
) **SS: AFFIDAVIT OF KEVA HIBBERT**
COUNTY OF POLK)

I, Keva Hibbert, being first duly sworn on oath, depose and state that I am the same Keva Hibbert identified in the foregoing Direct Testimony; that I have caused the foregoing Direct Testimony to be prepared and am familiar with the contents thereof, and that the foregoing Direct Testimony as identified therein is true and correct to the best of my knowledge, information and belief as of the date of this Affidavit.

/s/ Keva Hibbert
Keva Hibbert

Subscribed and sworn to before me, A Notary Public, in and for said County and State, this 14th day of November, 2016.

/s/ Craig F. Graziano
Notary Public

My Commission expires: June 14, 2017.