STATE OF IOWA
DEPARTMENT OF COMMERCE
UTILITIES BOARD

FILED WITH
Executive Secretary
November 22, 2013
IOWA UTILITIES BOARD

IN RE:	)	
PURPA STANDARDS IN THE ENERGY INDEPENDENCE AND SECURITY ACT OF 2007	)	Docket NO. NOI-2008-0003

COMMENTS OF THE
IOWA ASSOCIATION OF ELECTRIC COOPERATIVES

On October 18, 2013 the Iowa Utilities Board (Board) issued an Order Requesting Additional Information concerning smart grid issues. Specifically, the Order requested an update from the Iowa Association of Electric Cooperatives (IAEC) on meter replacement (Advanced Metering Infrastructure, commonly referred to as AMI) programs undertaken by various member cooperatives, including the progress made in AMI and Outage Management Systems working in tandem. This response is provided by the IAEC to provide an update on the activities of various IAEC members.

In previous filings, the IAEC noted that a number of the IAEC members have submitted waiver requests with the Board wherein the members identified their plans for upgrading their meters. The IAEC has checked with said members and would update the information with the following:

a. Maquoketa Valley Electric Cooperative (Docket WRU-07-41-943, Order issued February 1, 2008). The initial pleadings indicated that the Cooperative planned to replace all 15,698 of its meters.

b. Eastern Iowa Light & Power Cooperative (Docket WRU-08-9-920, Order issued June 2, 2008). The initial pleadings indicated that during the three year period following the

filing, the Cooperative intended to replace all of its electric meters (over 25,000) at a rate of approximately 8,500 meters per year.

c. Heartland Power Cooperative (Docket WRU-08-92-912, Order issued July 1, 2008). The initial pleadings indicated that the Cooperative would be replacing all meters on its system over a period of three years. In order to accommodate the planned schedule, the Cooperative indicated that approximately 6200 meters will be replaced in a three year period.

d. Southwest Iowa Rural Electric Cooperative (Docket WRU-08-36-900, Order issued November 4, 2008). The initial pleadings indicate that the Cooperative would be replacing all meters on its system over a period of two years. In order to accommodate the planned schedule, the Cooperative indicated that approximately 6000 meters will be replaced in a two year period.

e. Allamakee-Clayton Electric Cooperative, Inc. (Docket WRU-08-50-901, Order issued January 28, 2009). The initial pleadings indicated that the Cooperative would be replacing all meters on its system over a period of 6 years. In order to accommodate the planned schedule, approximately 9,550 meters will be replaced during the 6 year period.

f. Prairie Energy Cooperative (Docket WRU-2010-0012-0932, Order issued October 15, 2010). The initial pleadings indicated that the Cooperative would be replacing all meters on its system over a period of 1 year. In order to accommodate the planned schedule, approximately 5000 meters will be replaced in the 1 year period. A report was filed with the Board by Prairie Energy Cooperative on November 13, 2013. The report included a table showing the number of meters replaced and the size, type, capability, and manufacturer of the new meters. A total of 5,050 meters were reported as having been

replaced and the new meters are retrieving kWh usage, kW, outage information, and voltage. The report indicates that the data is recorded in 60 minute intervals and is transmitted to the Cooperative once every 24 hours using power line carrier communications technology.

g. Calhoun County Electric Cooperative Association (Docket No. WRU-2010-0013-0910, Order issued November 8, 2010). The initial pleadings indicated that the Cooperative would be replacing all meters on its system over a period of three (3) years. In order to accommodate the planned schedule, approximately 2,055 meters will be replaced in the three (3) year period.

h. Clarke Electric Cooperative, Inc. (Docket WRU-2011-0916, Order issued May 16, 2011). The initial pleadings indicated that the Cooperative would be replacing all meters on its system over a period of two years. In order to accommodate the planned schedule, approximately 6,100 meters will need to be replaced in a two year period. On November 7, 2013, Clarke Electric Cooperative, Inc. filed a report with the Board indicating that the meter replacements had been completed. The Cooperative noted that data is recorded at the meter in daily intervals and is transmitted to the Cooperative every 24 hours; however, the meters can be read in real time also. The new meters are retrieving kWh usage; Kw Daily; blink counts; Voltage (high/low); and TOU (4 polyphase). More detailed information can be obtained from the report filed with the Board.

i. Butler County Rural Electric Cooperative (Docket WRU-2011-0019-0908, Order issued October 13, 2011). The initial pleadings indicated that the Cooperative would be replacing all meters on its system over a period of five (5) years. In order to accommodate the planned schedule, approximately 6,530 meters will be replaced in the

five (5) year period.

j. Humboldt County Rural Electric Cooperative (Docket WRU-2011-0022-0936, Pending). The initial pleadings indicate that the Cooperative will be replacing all meters on its system over a period of 2 years. In order to accommodate the planned schedule, approximately 2300 meters will be replaced in the 2 year period. On November 15, 2013, a report was filed with the Board indicating that Humboldt County Rural Electric Cooperative merged with Midland Power Cooperative effective January 1, 2013. The report included a table showing the number of meters replaced and the size, type, capability, and manufacturer of the new meters. A total of 2,095 meters were reported as having been replaced and the new meters are retrieving kWh usage, kW, voltage, and outage detection/restoration information. The data is recorded in 60 minute intervals and is transmitted to the Cooperative once every 24 hours using power line carrier communications technology.

In addition to the foregoing, the IAEC has been advised that other members of the Cooperative have also been working on meter upgrade efforts, even though they may not have required a waiver filing. The distribution electric cooperatives that are members of IAEC serve about 210,000 electric meters in Iowa. Of these meters approximately 18% are AMR and another 60% are AMI. This brings the total AMR/AMI meters for these RECs to 78%. This data is from year end 2012 data as filed with the federal government.

IAEC began an effort, after the 2007 Iowa ice storm, of providing policy makers, the media and other stakeholders information through a web based outage map. The map allows users to view the outage data either by county or by electric cooperative.

IAEC began developing this web based outage tool in the summer of 2008 and provided training to the Iowa RECs in the fall of 2008 and the tool became live in the last quarter of 2008. The initial phase had RECs populating the data in the outage map on a manual basis. The IAEC developed a process of notifying the RECs on when to begin populating data on a manual basis based on criteria from the IUB rules and from events considered significant by the media.

Another feature which has been built into the web based tool allows the RECs the option of providing information about outages to the Iowa Utilities Board pursuant to rule IAC 199-20.19 through the web based tool.

The IAEC, in the last quarter of 2010, worked with an initial group of RECs and the National Information Solutions Cooperative (NISC) to allow for the population of the data into the map through electronic data exported from outage management systems. NISC is an information technology company that develops and supports software and hardware solutions for primarily utility cooperatives and telecommunications companies across the nation. NISC is an industry leader providing advanced, integrated IT solutions for consumer and subscriber billing, accounting, engineering and operations, as well as many other leading-edge IT solutions. In addition to NISC, the IAEC has worked with other organizations which support electric cooperatives such as Star Energy and Milsoft Utility Solutions to integrate the outage data into the IAEC outage map on an automated electronic basis.

Currently, Cooperatives serving over 50% of the meters served by IAEC membership are

providing data on an automated basis into the IAEC outage map. IAEC is currently working to add more cooperatives into this process and the next phase when completed will take the meter count to nearly two-thirds of the meters served by RECs.

The IAEC, in the summer of 2013, made a modification to the web based outage map which now includes a Google based map with the capability of displaying a weather overlay. Several other states across the country have either starting using this type of an approach or are exploring the possibility of using such.

This map can be viewed at: https://www.iowarec.org/outages/

The IAEC appreciates the opportunity to provide these comments as the Board continues with this inquiry docket.

Respectfully submitted,

SULLIVAN & WARD, P.C.
by: _____/s/ Dennis L. Puckett_____

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 22 day of November, 2013, the foregoing Comments were filed with the Iowa Utilities Board through the Electronic Filings system and therefore electronically served upon the parties participating in this Docket.

_____/s/ Dennis L. Puckett_____