

STATE OF IOWA
DEPARTMENT OF COMMERCE
UTILITIES BOARD

IN RE: INTERSTATE POWER AND LIGHT COMPANY	DOCKET NOS. TF-2015-0007 TF-2015-0008 (EEP-2012-0001)
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ORDER DOCKETING TARIFFS AND REQUIRING RESPONSE

(Issued February 27, 2015)

On January 29 and 30, 2015, Interstate Power and Light Company (IPL) filed with the Utilities Board (Board) proposed tariffs relating to the annual reconciliation of its energy efficiency cost recovery (EECR) factors, pursuant to Iowa Code § 476.6(16) and the energy efficiency plan approved in Docket No. EEP-2012-0001. The proposed tariffs were identified as TF-2015-0007 (electric) and TF-2015-0008 (gas). IPL filed revisions to TF-2015-0008 on February 12, 2015.

On February 18, 2015, the Office of Consumer Advocate (OCA) filed a conditional objection to TF-2015-0007. On February 19, 2015, OCA filed a conditional objection to TF-2015-0008. In both objections, OCA expressed concern about whether IPL's proposed EECR factors sufficiently reflect the anticipated levels of direct assignment to IPL's large general service and general service classes as agreed to by the parties in Settlement Issue 17 in Docket No. EEP-2012-0001, which was approved by the Board. OCA noted that IPL's approved energy efficiency plan budget is based on allocations determined in IPL's most recent rate case, which

differs from the directly assigned costs and makes it difficult to compare IPL's direct assignment spending versus budget for these customer classes. OCA said this comparison is used to determine whether a plan modification or spending waiver is required by 199 IAC 35.6(4).

Because of the difficulty in comparing nonresidential spending to budget with the recent introduction of direct assignment to the large general service and general service classes, OCA said that IPL should propose an alternative mechanism or method for evaluation of the nonresidential direct assigned spending. OCA said that while comparison is difficult, it appears that IPL spent less than 50 percent of its approved budget for gas energy efficiency programs for nonresidential customers and that total gas energy efficiency spending was 28 percent less than the approved budget. OCA said that a plan modification, or waiver of 199 IAC 35.6(4), might be necessary.

The Board will docket the proposed tariffs for further review. IPL will be required to respond to the concerns raised by OCA in its conditional objections on or before March 9, 2015, particularly OCA's interpretation of Settlement Issue 17; OCA may file a reply on or before March 16, 2015. Unless one of the parties requests a hearing in writing or the Board determines that a hearing is necessary, the Board will rule on the tariffs once its investigation is complete, pursuant to Iowa Code § 476.6(16)"g."

IT IS THEREFORE ORDERED:

1. Tariff filings TF-2015-0007 and TF-2015-0008 are docketed for further review and suspended.
2. Interstate Power and Light Company shall file a response to the Office of Consumer Advocate's conditional objections on or before March 9, 2015.
3. The Office of Consumer Advocate may file a reply to Interstate Power and Light Company's response on or before March 16, 2015.

UTILITIES BOARD

/s/ Elizabeth S. Jacobs

/s/ Nick Wagner

ATTEST:

/s/ Joan Conrad
Executive Secretary

/s/ Sheila K. Tipton

Dated at Des Moines, Iowa, this 27th day of February 2015.