

STATE OF IOWA
DEPARTMENT OF COMMERCE
BEFORE THE IOWA UTILITIES BOARD

**FILED WITH
Executive Secretary
March 27, 2015
IOWA UTILITIES BOARD**

IN RE:

ALTOONA TOWER CONDOMINIUMS, LLC
f/k/a IRONWOOD DEVELOPMENT, LC,

and

PROFESSIONAL PROPERTY
MANAGEMENT, INC.

DOCKET NO. WRU-2014-0013-0004

RESPONSE

The Office of Consumer Advocate (OCA), a division of the Iowa Department of Justice, files this Response to Applicants' Reply to MidAmerican Energy Company's Response to Applicants' Rate Information filed by Altoona Tower Condominiums, LLC (Altoona Towers) on March 20, 2015. OCA continues to believe that a residential master metering pilot will be a valuable source of information for the parties, the Board and the public, and will be a good first step to address the "split incentive" obstacle to energy efficiency in multi-family rental dwellings. As such OCA encourages the Board to swiftly establish the pilot project. In response to statements made regarding the appropriate rate structure in Altoona Towers' March 20 filing, OCA states:

1. The purpose of pilot projects is to test hypothesis and provide valuable data to the Board, the parties and the public. Altoona Towers has supplied projected load profile information indicating that the proposed project will have a load profile more similar to that of a typical commercial customer served under MEC's LS Large Electric Rates than to a typical residential customer. It would be proper for the Board to set rates at or near to MEC's LS Large Electric Rates for the duration of the pilot project.

2. In the alternative, the Board could apply rates equal or similar to MEC's LS Large Electric Rates for some shorter initial period, such as the first year of reasonably full occupancy. After an initial period, the Board and the parties will have actual usage data from which to judge the property's true load profile characteristics.

WHEREFORE, OCA respectfully asks that the Board promptly approve the pilot project and set rates at or near the LS Large Electric Rates for the duration of the pilot project, or, in the alternative, some other time period sufficient to yield a meaningful load profile based on actual usage data.

Respectfully submitted,

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Consumer Advocate

/s/ John S. Long _____

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OFFICE OF CONSUMER ADVOCATE