

**STATE OF IOWA  
DEPARTMENT OF COMMERCE  
IOWA UTILITIES BOARD**

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<b>IN RE:</b>	)	
	)	<b>DOCKET NOS: TF-2016-0321</b>
	)	<b>TF-2016-0322</b>
<b>INTERSTATE POWER AND LIGHT COMPANY</b>	)	
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**OBJECTION BY ENVIRONMENTAL INTERVENORS**

The Environmental Law & Policy Center (ELPC) and Iowa Environmental Council (IEC), collectively “Environmental Intervenors,” file this objection in response to Interstate Power and Light Company’s (IPL) tariff filings on May 17, 2019. Environmental Intervenors object because IPL did not provide supporting documentation for its proposed revisions to the load factors used in the tariff.

**Background**

On May 17, 2019, IPL filed a revised tariff in TF-2016-0322. These revised tariffs responded to the Order issued by the Iowa Utilities Board (“Board”) on March 17, 2017, granting in part, and denying in part, applications for rehearing and requiring a revised tariff filing by IPL and represented the latest step in developing net metering pilot tariffs first ordered by the Board on July 19, 2016, as a culmination of the Distribution Generation Notice of Inquiry docket, NOI-2014-0001.

Commenters raised concerns in previous comments about the approach IPL proposed for establishing caps for net metering. On March 17, 2017, the Board issued an Order allowing IPL to proceed with its proposed approach. The Board also required IPL to provide additional information and clarification on its approach in a revised tariff filing. IPL provided a revised

tariff and supporting documentation, including workpapers to support the calculations. In 2018, IPL revised its tariff to incorporate updated calculations using 2017 class load data. IPL filed the supporting workpapers containing calculations of the class load data in conjunction with its 2018 revision.

IPL now states that it proposes to revise the tariff based on “updated load factors and corresponding non-coincident demands based on 2018 data, and to update the sample calculation presented in the tariff.” However, IPL did not file the supporting workpapers. In addition, IPL’s revised net metering pilot tariff and interpretation letter creates ambiguity and needs additional clarification.

While we continue to have serious concerns about IPL’s approach to limit net metering based on one-time customer demand, this objection focuses on the justification for revisions within the scope of the most recent Board order.

### **The Revision to the Load Factor is Not Supported**

IPL proposes to change the load factor for residential, general service, and large general service customers who do not have historical kW demand data. The supporting documentation IPL filed only contains data from existing customers –those who do have historical kW demand data. IPL has filed no documents to support the revision to the load factor for customers without historical data.

Environmental Intervenors reviewed IPL’s most recent class load filing and found that it does not contain the data provided in the previous tariff updates. Environmental Intervenors were not able to calculate the revised load factor that IPL proposed from the available data. IPL should provide the same type of supporting work papers that it provided with the tariffs in 2017 and 2018. In both of those instances, IPL filed a spreadsheet labeled Attachment A that contained

detailed load data by customer class, including the inputs and calculations IPL used to determine load factors and associated net metering caps. Until it provides this information, the evidence in the record only provides support for IPL's 2018 revision to load factors.

**The Applicability of the Revised Tariff is Unclear**

The revised tariff does not explicitly limit its applicability to future or existing customers. On its face, it can apply to any customer. However, IPL filed an interpretation to accompany the tariff that states the revised load factors "will be utilized for new Pilot customers that do not have historic kW demand data," implying that existing customers in the Pilot would not be subject to the revision. More specifically, customers with incomplete data would fall in a gap that the interpretation does not address: they may not be new, but they may not have adequate historic kW demand data.

We suggest that this issue should be resolved before a final tariff revision takes effect.

**Conclusion**

Environmental Intervenors object that the proposed revision to the tariff cannot be approved in the absence of supporting documentation consistent with past revisions to this tariff. Upon the filing of that information, Environmental Intervenors may withdraw this objection. Environmental Intervenors further request that the opportunity to object to the tariff be extended until 30 days after the supporting information is provided.

Respectfully submitted this 29th day of May, 2019.

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