

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

IN RE:)	
)	DOCKET NOS: TF-2016-0321
)	TF-2016-0322
INTERSTATE POWER AND LIGHT COMPANY)	
)	

WITHDRAWAL OF OBJECTION BY ENVIRONMENTAL INTERVENORS

The Environmental Law & Policy Center (ELPC) and Iowa Environmental Council (IEC), collectively “Environmental Intervenors,” file this withdrawal of its objection in response to Interstate Power and Light Company’s (IPL) tariff filings on May 17, 2019, subsequent workpaper filing on May 29, 2019, and response on June 13, 2019. Environmental Intervenors withdraw their objection due to the additional information and explanation provided by IPL.

Environmental Intervenors’ initial objection resulted from the lack of supporting documentation filed by IPL when it initially filed the tariff change, unclear applicability of the proposed tariff, and potential inconsistency with the goals of the pilot program. IPL has now filed the additional supporting documentation that it provided in past years and its response provided additional explanation regarding the applicability of the proposed tariff.

We note that the interpretation letter from the original filing stated that “IPL will utilize the customer class non-coincident demand from the annual class load data filing to make this determination.” Interpretation No. IPL E2016-21, Docket Nos. TF-2016-0321, TF-2016-0322 (Mar. 31, 2017). It did not expressly provide for annual updates to the load factor. In its response, IPL relied on the use of the “annual class load data filing” to justify annual changes to the load factor in the tariff.

The update IPL has proposed marks the first increase in load factor in a tariff since the pilot project began. This update will reduce the size of solar installations at customer sites subject to net metering, and it therefore reduces the support for renewable energy development. This is contrary to the goal of the pilot and the Iowa Code. Docket No. NOI-2014-0001, Order Directing Filing of Net Metering Tariffs (July 19, 2016) at 5 (stating changes to the pilot “are consistent with Iowa Code § 476.41, which encourages renewable energy development”).

Although this is the first tariff update to increase a load factor, Environmental Intervenors recently learned that IPL notified electric generation dealers and installers of updates to the general service load factor and load limit in 2018. The notification stated that, effective May 4, 2018, the load factor would be 25 percent (from 24 percent) and the load limit would be 10.78 kW (from 12.75 kW). *See* Devin Wever Email (May 2, 2018) attached as Exhibit 1. Despite this communication, IPL did not fully update its tariff: the general service load factor in the 2018 tariff remained the same, even though the load limits were updated.¹ The Excel calculator that IPL provided relied on the updated load factor that was not incorporated into the tariff. Moreover, the tariff was filed more than three months after IPL issued notification, and stated that it would become effective on September 16, 2018. While we continue to have concerns with this approach to net metering, if it is continued in the future, we hope and expect that IPL will accurately communicate the tariffs to customers, dealers, installers, parties, and the Board.

¹ Environmental Intervenors note that the general service load limit in the email notification did not match the load limit in the subsequently filed tariff (10.78 kW in the email vs. 10.68 kW in the tariff).

Respectfully submitted this 21st day of June, 2019.

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