

STATE OF IOWA
BEFORE THE IOWA UTILITIES BOARD

IN RE: INTERSTATE POWER AND LIGHT COMPANY	DOCKET NOS. TF-2016-0321 TF-2016-0322
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RESPONSE TO AMENDED OBJECTION OF ENVIRONMENTAL INTERVENORS

Interstate Power and Light Company (“IPL” or “the Company”) files this response to the Amended Objection submitted in the above-referenced dockets by the Environmental Law & Policy Center and Iowa Environmental Council (collectively, “Environmental Intervenors”) on June 5, 2019 (“Objection”).

BACKGROUND

The Iowa Utilities Board (“Board”) on March 17, 2017 issued an Order in these dockets directing IPL to file a new net metering tariff pilot (“Net Metering Pilot”) containing the customer class average annual load factors that would be used for customers that do not have historical kW demand data, the customer class non-coincident demand that will be used to define the load for a customer with no historic kWh usage, and a sample calculation showing how the load limitations for customers with no historic kW data are determined. IPL submitted revised compliance tariffs on March 31, 2017 (containing the necessary calculations and incorporating updated load factors and corresponding non-coincident demands based on data from October 2015 – September 2016), on August 17, 2018 (containing the required information based on

2017 data), and on May 17, 2019 (containing the required information based on 2018 data).¹

ARGUMENT

Environmental Intervenors' argue that the data provided in the Net Metering Pilot workpapers is inconsistent with class load data IPL filed in docket IAC-2019-3511. The data *is* consistent, but measures different data points and the dockets are subject to different filing requirements. Further, IPL has not "revised" its load factors for the purpose of reducing eligibility for net metering, as Environmental Intervenors suggest; rather, IPL has continued its approved practice of updating the load factors annually so that they are accurate. Finally, the applicability of the proposed tariff is clear.

IPL's workpapers are consistent with the class load data.

Environmental Intervenors argue that "[t]he Attachment A workpapers that IPL filed on May 29, 2019, have data that is inconsistent with the class load data that IPL filed in docket IAC-2019-3511 on May 15, 2019." Objection at 2. The data sets are consistent; they simply don't measure the same data points. In the Attachment A workpapers for the Net Metering Pilot, the kilowatt hours are for a *calendar* month and the population is the number of *meters*. But in docket IAC-2019-3511, the kilowatt hours are for *billing* month and the population count is the number of *customers*.

But both sets of data rely on the same load research analysis. One can see, for example, that the residential class max kW, the largest estimated load of the total residential class in January 2018, is reported as 764,569 on January 2, 2018 at 18:00 in multiple locations of both filings, including in Attachment A (rows 15, 16 and 17 of the Residential tab) and in the IAC 199-35.11 Electric Forecast and Class Load Research

¹ Due to technical issues, IPL refiled supporting workpapers on May 29, 2019.

Data File 2019 Class Load Data (“2019 Class Load Data”) (page 5 of the .pdf, under the heading “Total System Class Max KW”). Likewise, the class demand coincident with system peak is shown in numerous locations as being 761,141.79 on January 2, 2018 at 19:00, including both on Attachment A (rows 22, 23 and 24 on the Residential tab) and in the 2019 Class Load Data (page 6 of the .pdf under the heading “Total System Class Coin. KW”).

Environmental Intervenors also argue that “IPL appears only to provide non-coincident demand data by customer class in the workpapers filed in this docket and does not include the non-coincident demand data or any explanation of this data in the class load data docket, IAC 2019-3511.” However, non-coincident demand is not required to be reported in the 2019 Class Load Data and, therefore, is not included in that filing. As reported in Attachment A, the class non-coincident demand is merely the sum at the peak of the class. All analysis is based on metered data from the load research sample of customers.

IPL has updated load factors annually, as approved by the Board.

Environmental Intervenors next take issue with “IPL’s proposed revisions to load factors,” arguing that the updated factors “would reduce the size of DG systems that are eligible for net metering under the IPL approach to setting net metering caps.” Objection at 3-4. But IPL has merely continued with the approved practice of updating the load factors annually, so that they accurately reflect IPL’s current annual class load data.

As noted in IPL’s initial compliance tariff filing for the Net Metering Pilot, filed on March 31, 2017, IPL uses “customer class average *annual* load factors” for customers who do not have historical kilowatt demand data. See Net Metering Pilot – Renewable

Energy Facilities, at Second Substitute Revised Sheet No. 42 (March 31, 2017) (emphasis added). In line with this, IPL submitted an annual update of the load factors on August 17, 2018, which the Board approved. See Approval Letter Regarding Tariff Revision, TF-2016-0321, TF-2016-0322 (Sept. 12, 2018). Therefore, rather than “eroding” the objectives of the Net Metering Pilot, IPL has followed the initial approved compliance tariff in updating this data annually to accurately reflect estimated customer demand based on load research data. IPL is accurately net metering new pilot participants without 12 months of demand history using the Board approved methodology of calculating based on the customer class average annual load factors.

Further, and as discussed below, IPL continues to offer customers who are subject to the estimated demand factor and are net metering less than 100% of their generation at full retail, the opportunity to reset their demand level/net metered amount based on their actual demand after 12 months.

Although the Environmental Intervenors do not explicitly ask the Board to prevent IPL from updating its load factor data annually, that is the only logical result of their argument challenging this approved practice. The Board should not prevent IPL from relying on accurate, annual load factor data in administering the Net Metering Pilot.

The applicability of the tariff is clear.

Finally, Environmental Intervenors argue that the applicability of the proposed tariff is unclear because “[t]he revised tariff does not explicitly limit its applicability to future or existing customers,” and 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.” Objection at 4. First, IPL in this most recent revised tariff has made no changes to the applicability as compared to previously

approved versions. Accordingly, even if this “gap” hypothetically existed (which, for the reasons discussed below, it does not), it would have existed at the time the original net metering tariff was approved.

Second, the fact that the interpretation accompanying the proposed revised tariff noted that updated “load factors and non-coincident demands will be utilized for new Net Metering Pilot customers that do not have historic kW demand data” does not create ambiguity. For a new net metering pilot participant who does not yet have 12 months of historic demand (kW) data, IPL applies the class load factor and formula described in the tariff to estimate the customer’s load eligible for net metering. For a new net metering pilot participant who does not have 12 months of historic energy (kWh) data, IPL applies the non-coincident demand. For any customer participating in the Net Metering Pilot who was initially eligible to net meter less than 100% of generation, after one year of the asset being in service, IPL reaches out to the customer to determine if they would like their load limit reviewed to determine if it should be increased based on the customer’s annual peak energy demand, rather than the initially used class average demand. Therefore, there is no risk of a customer falling into a “gap,” as Environmental Intervenors argue.

CONCLUSION

For the foregoing reasons, IPL respectfully asks that the Board approve its revised Net Metering Pilot Tariff, as filed on May 17, 2019.

DATED this 13th day of June, 2019.

Respectfully submitted,

Interstate Power and Light Company

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