

STATE OF IOWA
DEPARTMENT OF COMMERCE
BEFORE THE IOWA UTILITIES BOARD

IN RE: WINTER MORATORIUM EXTENSION;	DOCKET NO. SPU-2020-0003
IN RE: IOWA AMERICAN WATER COMPANY;	DOCKET NO. ARU-2020-0123
IN RE: INTERSTATE POWER AND LIGHT COMPANY;	DOCKET NO. ARU-2020-0150
IN RE: MIDAMERICAN ENERGY COMPANY;	DOCKET NO. ARU-2020-0156
IN RE: LIBERTY UTILITIES (MIDSTATES NATURAL GAS) CORP d/b/a LIBERTY UTILITIES; AND	DOCKET NO. ARU-2020-0222
IN RE: BLACK HILLS/IOWA GAS UTILITY COMPANY, LLC d/b/a BLACK HILLS ENERGY	DOCKET NO. ARU-2020-0225

RESPONSE TO ADDITIONAL REPORTING INSTRUCTIONS

COMES NOW the Office of Consumer Advocate (OCA), a division of the Iowa Department of Justice, and offers the following in response to the additional reporting requirements authorized by the Iowa Utilities Board (Board) in its “Order Authorizing Regulatory Accounts and Establishing Additional Reporting Instructions,” issued May 1, 2020 (hereafter May 1 Order):

1. The Board intended its May 1 Order to be “one step in a series of actions to be taken by the Board, formally and informally, to provide assistance to customers and utilities and to aid in Iowa’s recovery” from the COVID-19 pandemic. Through its prior orders, the Board extended the winter moratorium for utility customers until the Governor lifted the public health emergency. As such restrictions on disconnection ended, the Board recognized that coordination was needed among the Board, utilities, and partner agencies “to minimize ramifications while assuring both safe, reliable service to customers and just and reasonable compensation to the utilities.” (May 1 Order, pp. 2-3).

2. As part of its coordination effort to “minimize ramifications,” the Board required all rate-regulated utilities to file monthly residential customer reports and weekly updates, which are to include information relevant to the annual moratorium on the disconnection of residential electric or natural gas customers as identified in Board rules 199 IAC 19.2(5)(j) and 199 IAC 20.2(5)(j). (May 1 Order, pp. 5, 8). In addition, the Board determined it appropriate for additional specific disconnection and payment plan information for residential, commercial, and industrial customers. (May 1 Order, pp. 6, 8). The Board directed that rate-regulated utilities are to file these reports through September 4, 2020, and that all reporting categories are to be separated by residential, commercial, and industrial customer classes in addition to the totals reported for all classes. (May 1 Order, p. 8).

3. The challenges posed by the COVID-19 crisis have heightened the importance of sustained, affordable access to essential home energy service for all households across Iowa. Yet, there is only a limited data-driven understanding of the customers and households that struggle with utility affordability and security. Without the appropriate data, energy affordability challenges remain ambiguous and the effectiveness of utility credit and collections practices

cannot be adequately assessed. Moreover, the absence of this data impedes the development and implementation of effective programs and policies to address access and affordability challenges.

4. Requiring the rate-regulated utilities to report the information required in the Board's May 1 Order by census tract is the best way to "minimize ramifications" by tracking the data necessary for targeting specific communities that have been most significantly impacted by the COVID-19 crisis and are most in need of a company's assistance. Obtaining utility-specific customer information, as well as disconnection and payment plan information for residential, commercial, and industrial customers at the census tract level will allow the Board to review important demographic information from the U.S. Census Bureau. Such information is vital to the understanding of a utility's customer base and the identification of those customers who could most benefit from energy efficiency programs and services, weatherization services, consumer education, or LIHEAP eligibility. Interstate Power and Light has relied on U.S. Census Bureau data to describe the economic challenges faced by its customers.¹ This geographically granular data is needed to flag any disparities among customers and the services they receive, but also to inform companies of how to effectively target energy efficiency and other affordable energy programming to those communities that could be most benefitted.

5. OCA requests that the Board require the rate-regulated utilities filing monthly reports and weekly updates pursuant to the May 1 Order to report the information requested by census tract, or at least by zip code. Having access to the demographic information obtainable by census tract reporting will assist the Board in achieving its goal of minimizing ramifications to Iowa customers as utilities resume their disconnection practices. OCA recognizes some companies may have billing system constraints which may result in programming expenses to

¹ *In re: Interstate Power and Light Co.*, Docket No. RPU-2019-0001, "OCA Parker Direct Testimony," p. 8 and "OCA Parker Direct Exhibit 4 – IPL Response to OCA DR No. 15" (Filed Aug. 1, 2019).

track census data, but the benefit of receiving this information far outweighs any burden the companies may assert. Utilities know which customers are behind on their bills, receive disconnection notices, have service disconnected or restored, or who have entered into deferred payment agreements and the zip code information of these customers is readily available. If census tract reporting is not required, reporting this information by zip code would necessitate only a minor change to a company's data analytic technology and the information obtained would allow companies to more appropriately target services to specific communities and minimize disconnection ramifications.²

WHEREFORE, for the foregoing reasons, OCA requests the Board require rate-regulated utilities to file the additional reporting, pursuant to the Board's May 1 Order, by census tract or zip code.

Respectfully submitted,

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OFFICE OF CONSUMER ADVOCATE

² Notably, the Illinois Commerce Commission requires similar credit and collection data to be reported by zip code. *See In re: In the Matter of Moratorium on Disconnection of Utility Services during the Public Health Emergency Declared on March 9, 2020 pursuant to Sections 4 and 7 of the Illinois Emergency Management Agency Act*, "Final Order – Appendix 1," pp. 7-8 (ICC issued June 18, 2020).