

STATE OF IOWA
DEPARTMENT OF COMMERCE
BEFORE THE IOWA UTILITIES BOARD

IN RE:	
INTERSTATE POWER AND LIGHT COMPANY	DOCKET NO. EEP-2018-0003

RESPONSE

On October 15, 2020, Interstate Power and Light Company (IPL) filed with the Iowa Utilities Board (Board) an “Application for Limited Modification of IPL’s Energy Efficiency Plan Budgets and Impact Goals.” In its Application, IPL states that it plans to add a “Smart Thermostat Pilot” to its Demand Response (DR) portfolio. According to IPL, this pilot will provide an opportunity for customers to engage with a new smart energy technology that allows them to better monitor and manage their energy usage. IPL also states that the pilot will support its efforts to manage peak demand in Iowa in the near-term and creates a platform for future partnerships with customers to expand the DR portfolio as a supply-side resource within the Clean Energy Blueprint.

The Office of Consumer Advocate (OCA), a division of the Iowa Department of Justice, believes the pilot program to be a positive addition to IPL’s DR portfolio. The anticipated participation levels appear to allow for steady enrollment in the program and IPL has calculated the proposed pilot to be cost-effective. OCA offered testimony supporting the use of smart thermostats in the DR program during the energy efficiency plan proceedings before the

Board in this docket. (Munoz Direct Testimony, p. 17, lines 12-14). The proposed program is consistent with OCA witness Munoz's recommendation in the earlier proceeding to "fully implement the use of smart thermostat technology as part of its Residential DLC program" and IPL has pursued its commitment to explore a smart thermostat pilot. (Final Order, p. 60 (issued March 26, 2019)). OCA supports IPL's efforts to move forward with the pilot and encourages IPL to take steps to maximize customer participation in the program.

OCA agrees with the recommendation made by the Energy Law and Policy Center (ELPC) and the Iowa Environmental Council (IEC) (collectively "Environmental Intervenors") for a collaborative meeting to be held 12-18 months after the implementation of the program. (See "Comments on IPL's Application for Plan and Budget Modification" filed October 26, 2020). A collaborative meeting would allow stakeholders to learn of the successes and challenges of the program and offer any suggestions to improve the program or customer participation. IPL should also follow the Board's directive to include any information from the program in IPL's energy efficiency annual reports. (Final Order, p. 61).

OCA notes that Board staff filed correspondence in this docket on October 21, 2020, asking for additional information from IPL. OCA will monitor IPL's response to the questions raised by Board staff and will comment as deemed appropriate.

CONCLUSION

WHEREFORE, the OCA does not object to the “Application for Limited Modification of IPL’s Energy Efficiency Plan Budgets and Impact Goals” filed by IPL on October 15, 2020, as discussed above.

Respectfully submitted,

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