

STATE OF IOWA  
DEPARTMENT OF COMMERCE  
BEFORE THE IOWA UTILITIES BOARD

IN RE:	
IOWA-AMERICAN WATER COMPANY	DOCKET NOS. RPU-2020-0001 & TF-2021-0097

**RESPONSE TO COMPLIANCE FILING**

COMES NOW the Office of Consumer Advocate (OCA), a division of the Iowa Department of Justice, and submits this Response to Iowa-American Water Company's ("Iowa-American" or "Company") "Compliance Filing" filed with the Utilities Board (Board) by Iowa-American on September 23, 2021.<sup>1</sup>

1. On June 28, 2021, the Board issued its "Final Decision and Order" ("Order") regarding the application for rate increase filed by Iowa-American on August 28, 2020, authorizing Iowa-American an overall revenue requirement of \$43,813,200, reflecting a revenue increase of \$2,263,081.

2. On July 9, 2021, Iowa-American filed a "Motion for Clarification" seeking the Board's approval of the methodology the Company implemented to refund the EADIT amount to customers over the required three-year period.

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<sup>1</sup> The Board's Electronic Filing System reflects two different filing dates for Iowa-American's "Compliance Filing": September 23, 2021, in Docket No. RPU-2020-0001 and September 24, 2021, in Docket No. TF-2021-0097. For purposes of this Response, OCA will refer to the earlier date.

3. On July 16, 2021, Iowa-American filed a “Compliance Filing” in accordance with the Board’s Final Decision and Order, which includes a compliance tariff, an updated class cost of service study (COSS), a final revenue allocation by customer class, the rate calculations for each customer class, and an updated non-recurring revenue and expense rider. In the transmittal letter accompanying the compliance filing, Iowa-American noted that while the Board not yet ruled on its July 9 Motion for Clarification, Iowa-American filed the compliance documents and based the calculations in its filing as if the Board granted the adjustments requested in its motion.

4. On July 23, 2021, OCA filed a Response to Iowa-American’s Motion. Iowa-American filed a Reply to OCA’s Response on July 28, 2021, and OCA responded to that Reply on August 3, 2021.

5. On September 21, 2021, the Board issued an “Order Addressing Compliance Filing and Motion for Clarification” in this proceeding and rejected Iowa-American’s July 16 filing. The Board required Iowa-American to file several specific revisions to the compliance tariff as described in the Order.

6. Iowa-American filed a revised “Compliance Filing” on September 23, 2021, as directed by the Board’s September 21 Order.

7. After review and investigation, OCA does not object to the information filed by Iowa-American on September 23. OCA notes that the compliance tariff filed by Iowa-American does not include a proposed effective date. OCA requests the Board require Iowa-American to file revised tariffs after the Board rules on the “Compliance Filing” that reflects the appropriate effective date as established by the Board.

WHEREFORE, OCA does not object to Iowa-American's "Compliance Filing" as submitted on September 23, 2021.

Respectfully submitted,

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