

STATE OF IOWA
DEPARTMENT OF COMMERCE
BEFORE THE IOWA UTILITIES BOARD

IN RE: INTERSTATE POWER AND LIGHT COMPANY AND PRESTON MUNICIPAL UTILITIES	DOCKET NO. SPU-2021-0015
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STATEMENT OF POSITION

COMES NOW the Office of Consumer Advocate (OCA), a division of the Iowa Department of Justice, and for its Statement of Position with respect to the Petition for Adjustment of Service Territory (Joint Petition) filed by Interstate Power and Light Company (IPL) and Preston Municipal Utilities (PMU) (collectively “Applicants”) on November 22, 2021, states:

1. Applicants request that: (1) IPL be granted authority to serve delivery points that are presently part of the exclusive assigned service area of PMU, as described in Attachment A and, (2) PMU be granted authority to serve delivery points that are presently part of the exclusive assigned service territory of IPL, as described in Attachment A.

2. Iowa Code section 476.25(2) (2021) states the Iowa Utility Board shall approve a request for modification to utilities’ service areas upon a finding the modification “will eliminate or avoid unnecessary duplication of facilities, will provide adequate electric service to all areas and customers affected, will promote the efficient and economical use and development of the

electric systems of the contracting electric utilities, and is in the public interest.” Iowa Code § 476.25(2).

3. Board rule 20.3(9) states in relevant part:

Any electric utility or municipal corporation may file a petition for modification of service area which shall contain a legal description of the service area desired, a designation of the utilities involved in each boundary section, and a justification for the proposed service area modification. The justification shall include a detailed statement of why the proposed modification is in the public interest. A map showing the affected areas which complies with paragraph 20.3(11) “a” shall be attached to the petition as an exhibit.

Iowa Admin. Code r. 199-20.3(9).

4. Applicants assert “that a modification of their shared service territory boundaries in Jackson County is in the public interest, will avoid unnecessary duplication of facilities and will promote economical, efficient, and adequate electric service to the public. . . . These service territory modifications will result in no changes in electric service providers for existing customers.” Iowa Code § 476.25; Joint Petition, ¶¶ 4, 6.

5. The Joint Petition appears to be an appropriate request for modification of the provision of electric utility service to consumers. The requirements of Iowa Code section 476.25 and Board rule 20.3(9) have been satisfied.

6. OCA has no objection to the Joint Petition.

WHEREFORE, OCA has no objection to the Petition for Adjustment of Service Territory filed by Interstate Power and Light Company and Preston Municipal Utilities.

Respectfully submitted,

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OFFICE OF CONSUMER ADVOCATE