1 STATE OF IOWA DEPARTMENT OF COMMERCE 2 BEFORE THE IOWA UTILITIES BOARD - - - - - - x 3 IN RE: Docket No. : : EEP-2022-0150 4 INTERSTATE POWER AND LIGHT : ORIGINAL 5 COMPANY : х - - - - - - -6 7 8 TRANSCRIPT OF HEARING 9 PUBLIC SESSION 10 11 Hearing Room 1375 East Court Avenue 12 Des Moines, Iowa Thursday, June 8, 2023 13 14 Met, pursuant to order, at 9 a.m. 15 16 BEFORE: THE IOWA UTILITIES BOARD 17 CECIL WRIGHT, Presiding Officer 18 (Pages 1 through 190) 19 (Pages 199 through 203) 20 21 22 23 24 25 DARCY KRIENS - CERTIFIED SHORTHAND REPORTER

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1
     APPEARANCES:
 2
     For the Iowa Utilities Board:
 3
           CARL BAKER, ESQ.
           MATTHEW OETKER, ESQ.
           Iowa Utilities Board
 4
           1375 East Court Avenue
           Des Moines, IA 50319
 5
 6
    For Interstate Power and Light Company:
 7
           MATTHEW J. SOWDEN, ESQ.
           500 East Court Avenue
           Suite 300
 8
           Des Moines, IA 50309
 9
     For the Office of Consumer Advocate:
10
           JENNIFER EASLER, ESQ.
           JENNIFER JOHNSON, ESQ.
11
           Office of Consumer Advocate
12
           1375 East Court Avenue
           Room 63
13
           Des Moines, IA 50319
14
    For Large Energy Group:
15
           HALEY R. VAN LOON, ESQ.
           BrownWinick Law Firm
           666 Grand Avenue
16
           Suite 2000
           Des Moines, IA 50309
17
18
     For Iowa Business Energy Coalition:
19
           LYNN HERNDON, ESQ.
           Nyemaster Goode, P.C.
20
           700 Walnut Street
           Suite 1600
           Des Moines, IA 50309
21
22
     For Environmental Law and Policy Center:
23
           JOSHUA T. MANDELBAUM, ESQ.
           Environmental Law & Policy Center
24
           505 Fifth Avenue
           Suite 333
           Des Moines, IA 50309
25
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| 1  | APPEARANCES (Continued):                               |
|----|--|
| 2  | For the Iowa Environmental Council:                    |
| 3  | MICHAEL R. SCHMIDT, ESQ.<br>Iowa Environmental Council |
| 4  | 505 Fifth Avenue<br>Suite 850                          |
| 5  | Des Moines, IA 50309                                   |
| 6  | For Clean Energy Districts of Iowa:                    |
| 7  | JAMES MARTIN-SCHRAMM<br>Winneshiek Energy District     |
| 8  | 217 West Water Street<br>Decorah, IA 52101             |
| 9  | Iowa Utilities Board Staff:                            |
| 10 | BRENDA BIDDLE  |
| 11 | JESSI MEYERS<br>GRACIE HART                            |
| 12 |  |
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| 1       |              |        | IN                | DEX        |                   |          |
| 2       | WITNESS:     | DIRECT | CROSS             | REDIRECT   | RECROSS           | BOARD    |
| 3       | For IPL      |        |                   |            |                   |          |
| 4       | A. Ellswort  | h 17   | 19<br>(Easler)    | 39         |                   | 35       |
| 5       | A. Velonis   | 41     | (Hasiei)<br>42    | 67         |                   | 64, 68   |
| 6       | A. VEIOIIIB  | ΤT     | (Easler)<br>62    | 07         |                   | 04, 00   |
| 7       |              |        | (Van Looi         | n)         |                   |          |
| 8       | K. Gehrke    | 70     | 73<br>(Easler)    | 114        | 114 1<br>(Easler) | .07, 115 |
| 9       |              |        | 97<br>(Van Looi   | <b>,</b> ) | (Habier)          |          |
| 10      |              |        | 103<br>(Herndon)  |            |                   |          |
| 11      |              | ( M    | 103<br>lartin-Sch |            |                   |          |
| 12      | A. Iano      | 122    | 123               | ir anni )  |                   | 133      |
| 13      | 111 10110    |        | (Johnson)<br>126  | )          |                   | 200      |
| 14      |              |        | (Van Looi         | ב)         |                   |          |
| 15      | For OCA      |        |                   |            |                   |          |
| 16      | S. Bents     | 135    |                   |            |                   |          |
| 17      | B. Kruger    | 137    |                   |            |                   | 138      |
| 18      | M. Munoz     | 145    | 146<br>(Van Looi  | 169<br>n)  |                   | 165      |
| 19      |              |        | 159<br>(Herndon)  | -          |                   |          |
| 20      | T. Tessier   | 171    |                   | -          |                   |          |
| 21      | For LEG      |        |                   |            |                   |          |
| 22      | D. Vognsen   | 173    |                   |            |                   | 174      |
| 23      | For IBEC     |        |                   |            |                   |          |
| 24      | R. Stephens  | 177    |                   |            |                   |          |
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| WITNESS: DIRECT                        | CROSS | REDIRECT | RECROSS BOARD |
|--|-------|----------|---------------|
| For CEDI                               |       |          |               |
| J. Martin-Schramm                      | ı     |          | 186           |
|  |       |          |               |
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| (phonetic) indica<br>{sic} indicates t | _     |          | _             |

Quoted text is as stated by the speaker.

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| 1  | PROCEEDINGS  |
|----|--|
| 2  | PRESIDING OFFICER WRIGHT: So good morning.             |
| 3  | We're on the record in Docket No. EEP-2022-0150. My    |
| 4  | name is Cecil Wright, and I've been appointed by the   |
| 5  | Iowa Utilities Board to conduct this hearing today and |
| 6  | prepare a proposed decision and issue that. The date   |
| 7  | is June 8, 2023, and the time is approximately 9 a.m.  |
| 8  | I'll just start off with kind of the goals             |
| 9  | of today. I've been told I need to finish this up in   |
| 10 | one day, so I don't know how that affects your         |
| 11 | questioning or whatever, but we will see.              |
| 12 | To give you an idea, we have prefiled                  |
| 13 | testimony. I've been through the prefiled testimony.   |
| 14 | I have Board staff to support me. They've been         |
| 15 | through the prefiled testimony. So I expect your       |
| 16 | questions today to be cross-examination questions and  |
| 17 | not just a repetition of what was presented in your    |
| 18 | prefiled testimony.                                    |
| 19 | If the witnesses don't appear to be                    |
| 20 | answering the questions, I may step in and direct the  |
| 21 | witness to answer the question. If they know the       |
| 22 | answer, they can answer. If they don't, they don't.    |
| 23 | I don't need the witnesses to repeat what they have    |
| 24 | prefiled.  |
| 25 | So that's just kind of to let you know so              |

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| 1  | we can move this along. I think with the number of     |
|----|--|
| 2  | witnesses, we will be here all day. I'm just hoping    |
| 3  | we don't have to go too far into the evening.          |
| 4  | In our regular practice for the Board, we              |
| 5  | take a break in the morning. We take a lunch break     |
| 6  | somewhere between 12:00 and 2:00. Probably today       |
| 7  | around sometime after 12:00, and then we'll come back  |
| 8  | in an hour, and then we'll take an afternoon break and |
| 9  | see where we are and figure out how late we need to    |
| 10 | go.  |
| 11 | Hopefully, if you need to make plans for               |
| 12 | that, you can plan accordingly. Of course, if we're    |
| 13 | zooming right along, then it will be over, and you can |
| 14 | go home at the regular time.                           |
| 15 | So most of you know my background. I have,             |
| 16 | I guess, you'd call an extensive background in public  |
| 17 | utility regulation. I don't have a lot of background   |
| 18 | with regard to energy efficiency programs.             |
| 19 | It's been a while since I've been called to            |
| 20 | an all-day hearing, but when I worked for the Missouri |
| 21 | Public Service Commission, this is what I did. I held  |
| 22 | hearings. I may be a little rusty, but I think we'll   |
| 23 | probably get through it, and we'll get your questions  |
| 24 | asked and get the evidence into the record so that I   |
| 25 | can write a proposed decision.                         |

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| 1  | As I indicated, the purpose of the hearing             |
|----|--|
| 2  | is to allow for cross-examination. As you know, we're  |
| 3  | governed by 17A, the statute, and also 476.            |
| 4  | Then the Board has rules. They have their              |
| 5  | Chapter 7 rules with regard to proceedings, and they   |
| 6  | have the Chapter 35 rules with regard to energy        |
| 7  | efficiency.  |
| 8  | So I will take appearances, and then we'll             |
| 9  | go over some preliminary matters. Then we will begin   |
| 10 | taking cross-examination.                              |
| 11 | So whenever I ask for appearances, if you              |
| 12 | could indicate the order of your witnesses, that would |
| 13 | help, and for those of you who only have one, that     |
| 14 | will be easy.  |
| 15 | Okay. So we will begin, then, with                     |
| 16 | appearances. I've got my cheat sheet here, so if you   |
| 17 | see me here shuffling papers, staff has prepared this  |
| 18 | for me so I don't get lost.                            |
| 19 | Who appears for Interstate Power and Light?            |
| 20 | MR. SOWDEN: Matt Sowden appears on behalf              |
| 21 | of Interstate Power and Light. Today we have four      |
| 22 | witnesses, and we will call them in this order: Amy    |
| 23 | Ellsworth, then Aquila Velonis, then Kari Gehrke, and  |
| 24 | Adrianna Iano.   |
| 25 | PRESIDING OFFICER WRIGHT: Who appears for              |
|    |  |

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1 the Office of Consumer Advocate? 2 MS. EASLER: Jennifer Easler and Jennifer 3 Johnson for the Office of Consumer Advocate. We will 4 call our witnesses in alphabetical order, and that's 5 Kruger, Munoz and Tessier. 6 PRESIDING OFFICER WRIGHT: You're testing 7 me this morning. 8 Who appears for LEG? 9 MS. VAN LOON: Haley Van Loon from the 10 BrownWinick Law Firm. Our sole witness is Dave 11 Vognsen. 12 PRESIDING OFFICER WRIGHT: Who appears for 13 the Iowa Business Energy Coalition? 14 MS. HERNDON: I'm Lynn Herndon from 15 Nyemaster Goode on behalf of IBEC, and with me is IBEC's witness Robert Stephens. 16 17 PRESIDING OFFICER WRIGHT: I see also 18 listed on my cheat sheet Dustin Miller. Is he not 19 appearing today? 20 MS. HERNDON: He is not. PRESIDING OFFICER WRIGHT: 21 Okay. 22 Then who appears for Environmental Law and 23 Policy Center? 24 MR. MANDELBAUM: Josh Mandelbaum. 25 PRESIDING OFFICER WRIGHT: For the Iowa

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| 1  | Environmental Council?                                 |
|----|--|
| 2  | MR. SCHMIDT: Michael Schmidt on behalf of              |
| 3  | Iowa Environmental Council.                            |
| 4  | PRESIDING OFFICER WRIGHT: For my purposes,             |
| 5  | will each of you cross-exam the witnesses, or do you   |
| 6  | divide that up? How would you proceed?                 |
| 7  | MR. MANDELBAUM: We will probably not be                |
| 8  | cross-examining. We are monitoring.                    |
| 9  | PRESIDING OFFICER WRIGHT: Okay. Thank                  |
| 10 | you.   |
| 11 | Then also as a party to this case is the               |
| 12 | Clean Energy Districts of Iowa, and I think they've    |
| 13 | kind of put you in a difficult position,               |
| 14 | Mr. Martin-Schramm. It's my understanding you're an    |
| 15 | employee of CEDI; is that correct?                     |
| 16 | MR. MARTIN-SCHRAMM: I function as a                    |
| 17 | consultant with them. I have a title now, policy       |
| 18 | analyst for Clean Energy Districts of Iowa, but you're |
| 19 | right, I'm not represented by legal counsel. CEDI is   |
| 20 | not represented by legal counsel and, unfortunately,   |
| 21 | our executive director is out of the country.          |
| 22 | PRESIDING OFFICER WRIGHT: That's my                    |
| 23 | understanding. So my understanding of the              |
| 24 | requirements for appearing at a hearing like this and  |
| 25 | cross-examining witnesses is that you either be an     |

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| 1  | attorney or be approved by the Board or the presiding |
|----|---|
| 2  | officer to represent the company, but the Board rule  |
| 3  | is that it's either an official of the company or     |
| 4  | employee.   |
| 5  | Since you do not meet any of those                    |
| 6  | criteria, I do not believe The way I'm going to       |
| 7  | proceed and I've done this in other cases so          |
| 8  | hopefully it works is if you do have a question for   |
| 9  | a witness, I will ask you to tell me what that        |
| 10 | question is, and then I will determine whether the    |
| 11 | witness needs to answer or not.                       |
| 12 | MR. MARTIN-SCHRAMM: That's very fair. I               |
| 13 | came today with the expectation I would not be        |
| 14 | cross-examining witnesses but simply offering myself  |
| 15 | as a witness for cross-examination.                   |
| 16 | PRESIDING OFFICER WRIGHT: Okay. That will             |
| 17 | work. You're way ahead of me.                         |
| 18 | I think everyone here is familiar with how            |
| 19 | the hearing works. We take the Interstate Power and   |
| 20 | Light Company first and for cross-examination and any |
| 21 | questions I have, and then we take the witnesses from |
| 22 | the other parties. It's run pretty much like any      |
| 23 | other court proceeding.                               |
| 24 | So I will go in the order, if that's okay,            |
| 25 | that I went around and asked for appearances.         |
| 1  |   |

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| 1  | Do you have something?                                 |
|----|--|
| 2  | MS. JOHNSON: I was going to ask about                  |
| 3  | preliminary matters. There are a couple outstanding.   |
| 4  | PRESIDING OFFICER WRIGHT: Okay. I said                 |
| 5  | I've got my cheat sheet, so I'm going through it.      |
| 6  | MS. JOHNSON: Okay.                                     |
| 7  | PRESIDING OFFICER WRIGHT: So I think one               |
| 8  | of the preliminary matters that I need to address is   |
| 9  | the motion by OCA to accept cross-rebuttal testimony.  |
| 10 | Do any of the parties wish to address that             |
| 11 | motion?  |
| 12 | MS. JOHNSON: Cecil, I want to say I know               |
| 13 | that IBEC has filed a response to that motion stating  |
| 14 | that it has no objection to allowing Mr. Munoz's       |
| 15 | cross-rebuttal testimony, as long as Mr. Stephens may  |
| 16 | have an opportunity to address anything, as needed, at |
| 17 | hearing.   |
| 18 | OCA would like to go on the record today               |
| 19 | saying we have no objection to that. If Mr. Stephens   |
| 20 | needs to respond to anything in Mr. Munoz's            |
| 21 | cross-rebuttal testimony, we have no objection.        |
| 22 | PRESIDING OFFICER WRIGHT: Okay. I would                |
| 23 | suspect that IBEC can handle that, if it comes to that |
| 24 | point.   |
| 25 | So since I didn't hear any objections to               |

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| 1  | the motion, have the parties agreed to the admission   |
|----|--|
| 2  | of all of the prefiled testimony including the         |
| 3  | cross-rebuttal of OCA?                                 |
| 4  | Mr. Sowden.  |
| 5  | MR. SOWDEN: IPL has no objection.                      |
| 6  | PRESIDING OFFICER WRIGHT: Ms. Van Loon.                |
| 7  | MS. VAN LOON: No objection.                            |
| 8  | PRESIDING OFFICER WRIGHT: Ms. Easler or                |
| 9  | Ms. Johnson.   |
| 10 | MS. JOHNSON: OCA has no objection.                     |
| 11 | PRESIDING OFFICER WRIGHT: Ms. Herndon.                 |
| 12 | MS. HERNDON: With the caveat we made in                |
| 13 | our response, we have no objection.                    |
| 14 | PRESIDING OFFICER WRIGHT: I'm glad you                 |
| 15 | brought it up. I didn't think OCA was representing     |
| 16 | you.   |
| 17 | So if it is allowed, if we get to that                 |
| 18 | point and you feel like you need to have additional    |
| 19 | direct examination, it will be limited to just the     |
| 20 | issues that are raised by OCA in their cross-rebuttal, |
| 21 | okay?  |
| 22 | MS. HERNDON: That is what we expected as               |
| 23 | well. Thank you.                                       |
| 24 | PRESIDING OFFICER WRIGHT: Mr. Mandelbaum               |
| 25 | or Mr. Schmidt.  |
|    |  |

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| 1  | MR. MANDELBAUM: No objection.                          |
|----|--|
| 2  | PRESIDING OFFICER WRIGHT: Okay.                        |
| 3  | And in the normal course, as we do when the            |
| 4  | Board conducts the proceedings, if you reference an    |
| 5  | exhibit or testimony, we'll try to put it up on the    |
| 6  | screen and find the spot where you're referencing it.  |
| 7  | So we have tech people here who will do                |
| 8  | that. It may take a little bit, but we will proceed    |
| 9  | with cross-examination on that information once we     |
| 10 | have it up for everyone to see.                        |
| 11 | So if you have a hearing exhibit, the                  |
| 12 | normal procedure is we have someone who will collect   |
| 13 | those from you and distribute them to the court        |
| 14 | reporter and myself and the other parties.             |
| 15 | Oh, there was one more thing. Let me find              |
| 16 | it. I guess two things.                                |
| 17 | One is if there is confidential                        |
| 18 | information, we will hold all questions with regard to |
| 19 | confidential information until the end, and then we'll |
| 20 | go into closed session and address those.              |
| 21 | I will expect, Mr. Sowden, for you to                  |
| 22 | indicate if you think a question or answer is going to |
| 23 | get into confidential information, and we can hold     |
| 24 | that until later.                                      |
| 25 | MR. SOWDEN: Yes, Your Honor.                           |
| 1  |  |

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| 1  | PRESIDING OFFICER WRIGHT: And we'll                    |
|----|--|
| 2  | discuss briefs at the end of the hearing.              |
| 3  | MS. VAN LOON: Your Honor, can I address                |
| 4  | the confidential piece. We have a unique protective    |
| 5  | agreement in this instance in which we only view       |
| 6  | confidential information related to the electronic     |
| 7  | side and not the natural gas side, so if a party is    |
| 8  | going to bring up a confidential issue related to      |
| 9  | natural gas, we would need to leave the hearing room.  |
| 10 | PRESIDING OFFICER WRIGHT: Just remind me               |
| 11 | of that, if we get to that point.                      |
| 12 | MR. SOWDEN: Yes, we will. There is a                   |
| 13 | likelihood that confidential information will not come |
| 14 | up in this hearing.                                    |
| 15 | PRESIDING OFFICER WRIGHT: Well, I didn't               |
| 16 | see a lot of testimony about the natural gas side, so  |
| 17 | we'll see. If it does, just let me know, and we'll     |
| 18 | make accommodations.                                   |
| 19 | Okay. Do the parties have any preliminary              |
| 20 | matters that I need to address?                        |
| 21 | Mr. Sowden?  |
| 22 | MR. SOWDEN: No, Your Honor.                            |
| 23 | PRESIDING OFFICER WRIGHT: Okay.                        |
| 24 | Ms. Van Loon?  |
| 25 | MS. VAN LOON: No, Your Honor.                          |
|    |  |

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| 1  | PRESIDING OFFICER WRIGHT: Sorry. I'm out             |
|----|--|
| 2  | of order, but I'll figure it out.                    |
| 3  | Ms. Easler or Ms. Johnson?                           |
| 4  | MS. EASLER: No, Your Honor.                          |
| 5  | PRESIDING OFFICER WRIGHT: Ms. Herndon?               |
| 6  | MS. HERNDON: None.                                   |
| 7  | PRESIDING OFFICER WRIGHT: Mr. Mandelbaum             |
| 8  | or Mr. Schmidt?                                      |
| 9  | MR. MANDELBAUM: None.                                |
| 10 | PRESIDING OFFICER WRIGHT: Thank you.                 |
| 11 | I guess we're ready to take the first                |
| 12 | witness.   |
| 13 | MR. SOWDEN: Thank you, Your Honor.                   |
| 14 | Interstate Power and Light Company calls             |
| 15 | Amy Ellsworth to the stand.                          |
| 16 | PRESIDING OFFICER WRIGHT: The witness                |
| 17 | stand is right here (indicating).                    |
| 18 | THE WITNESS: Thank you.                              |
| 19 | PRESIDING OFFICER WRIGHT: I thought                  |
| 20 | everyone from IPL had been here before.              |
| 21 | Please stand and raise your right hand.              |
| 22 | AMY W. ELLSWORTH,                                    |
| 23 | called as a witness by Iowa Power and Light Company, |
| 24 | being first duly sworn by Presiding Officer Wright,  |
| 25 | was examined and testified as follows:               |
| 1  |  |

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| 1  | PRESIDING OFFICER WRIGHT: I don't know how            |
|----|---|
| 2  | long you're going to be here, so I want you to be     |
| 3  | comfortable.  |
| 4  | THE WITNESS: Thank you.                               |
| 5  | PRESIDING OFFICER WRIGHT: Okay. So,                   |
| 6  | Mr. Sowden, let me say something first. If there are, |
| 7  | like, typos and things like that that need to be      |
| 8  | corrected, if there's more than three or four, you    |
| 9  | need to file those, and we don't need to go through   |
| 10 | them here. Okay?                                      |
| 11 | MR. SOWDEN: Understood, Your Honor. Thank             |
| 12 | you.  |
| 13 | PRESIDING OFFICER WRIGHT: Go ahead.                   |
| 14 | DIRECT EXAMINATION                                    |
| 15 | BY MR. SOWDEN:  |
| 16 | Q. Good morning, Ms. Ellsworth. Could you             |
| 17 | please state your name and employer for the record?   |
| 18 | A. Amy W. Ellsworth, and I work at The Cadmus         |
| 19 | Group.  |
| 20 | Q. What's your position with Cadmus?                  |
| 21 | A. I'm a principal there.                             |
| 22 | Q. Are you the same Amy Ellsworth who filed or        |
| 23 | caused to be filed direct testimony in this           |
| 24 | proceeding?   |
| 25 | A. Yes.   |
|    |   |

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| 1  | Q. Do you have any changes or corrections to          |
|----|---|
| 2  | your prefiled testimony?                              |
| 3  | A. No.  |
| 4  | Q. If I were to ask you all the questions in          |
| 5  | your testimony today under oath, would you give the   |
| 6  | same answers?   |
| 7  | A. Yes.   |
| 8  | MR. SOWDEN: Your Honor, with the                      |
| 9  | understanding that Ms. Ellsworth's testimony has been |
| 10 | admitted into the record, Interstate Power and Light  |
| 11 | Company tenders Ms. Ellsworth for questions from the  |
| 12 | parties and the presiding officer.                    |
| 13 | PRESIDING OFFICER WRIGHT: Okay. Did we                |
| 14 | admit all of them? I don't think I've admitted all of |
| 15 | them.   |
| 16 | I asked if you had any objections, but I              |
| 17 | don't think I admitted it. Based on there being no    |
| 18 | objection to prefiled testimony, it's admitted into   |
| 19 | the record. Thank you.                                |
| 20 | (All prefiled testimony of the witnesses              |
| 21 | was admitted into the record.)                        |
| 22 | MR. SOWDEN: Thank you.                                |
| 23 | PRESIDING OFFICER WRIGHT: Ms. Easler or               |
| 24 | Ms. Johnson?  |
| 25 |   |
| 1  |   |

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1 CROSS-EXAMINATION 2 BY MS. EASLER: 3 Good morning, Ms. Ellsworth. Q. 4 Good morning. Α. 5 0. I want to start by directing you to your direct testimony at page 5. At this point you're 6 discussing the Inflation Reduction Act on lines 13 7 8 through 15 and that it could potentially bring 9 benefits to IPL's customers and provide additional 10 incentive to adopt efficiency measures and brings 11 uncertainty. By "uncertainty" you mean it's unclear how 12 13 the IRA-funded programs may affect some of IPL's 14 proposed programs; is that correct? 15 Α. That's correct. On that same page, lines 18 through 20, you 16 0. 17 state that, "a significant portion of the Inflation 18 Reduction Act calls for grants to be distributed to 19 state energy offices for the development of rebate 20 programs for whole-home retrofits (single-family and multi-family) with the rebates doubled for qualifying 21 22 low- and moderate-income residents"; is that correct? 23 Α. Correct. 24 Are you aware of any significant grant Q. 25 programs that have been developed for the Inflation

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| 1  | Reduction Act at this point?                           |
|----|--|
| 2  | A. Not yet, but DOE is in the process of               |
| 3  | developing guidelines.                                 |
| 4  | Q. So the uncertainty that you refer to in             |
| 5  | your testimony continues to this time?                 |
| 6  | A. Correct, yes.                                       |
| 7  | Q. And turning now to your reply testimony,            |
| 8  | please page 2, at line 17 through 21 you               |
| 9  | indicate that, "The injection of IRA (Inflation        |
| 10 | Reduction Act) dollars will be beneficial in terms of  |
| 11 | the promotional value for IPL's programs and is likely |
| 12 | to expand the reach of services and support available  |
| 13 | for low-income customers."                             |
| 14 | If, as a result of IRA-funded programs,                |
| 15 | certain IPL's program see an increase in participation |
| 16 | and the rate and support expands, as you suggest,      |
| 17 | would IPL review those programs?                       |
| 18 | A. Yeah, I expect so.                                  |
| 19 | Q. And how often would that review occur?              |
| 20 | A. Well, IPL is required to conduct                    |
| 21 | third-party EM&V once for each program in the          |
| 22 | five-year period. So at a minimum once, but I          |
| 23 | anticipate They're constantly monitoring the           |
| 24 | programs to make sure that they're, you know, coming   |
| 25 | in around the expected level of participation, so      |

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| 1  | ongoing.   |
|----|--|
| 2  | Q. Do you participate in the development of            |
| 3  | the annual report information that IPL prepares for    |
| 4  | its energy efficiency programs each year?              |
| 5  | A. I do not.   |
| 6  | Q. Do you know whether IPL would be reporting          |
| 7  | on Inflation Reduction Act impacts through those       |
| 8  | recording processes?                                   |
| 9  | A. I don't think that's been determined yet.           |
| 10 | Q. Okay. Is that something I should take up            |
| 11 | with Ms. Gehrke, would you say?                        |
| 12 | A. Yes.  |
| 13 | Q. On page 10 of your reply testimony, lines           |
| 14 | 10 through 12, you suggest that the amount of funding  |
| 15 | available annually through the IRA will not have a     |
| 16 | significant material effect on IPL's plan, and on      |
| 17 | page 2 of your reply testimony, line 15, you figure    |
| 18 | that the funding available to IPL's customers would be |
| 19 | about \$4 to \$5 million dollars each year; is that    |
| 20 | accurate?  |
| 21 | A. That was a rough calculation, based on the          |
| 22 | information we have available, yeah.                   |
| 23 | Q. Is it your position that the \$4 to \$5             |
| 24 | million IPL customers could see each year as a result  |
| 25 | of IRA-funded programs is not substantial enough to    |
| 1  |  |

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| 1  | make a material difference in the long-term costs or   |
|----|--|
| 2  | benefits of IPL's plan?                                |
| 3  | A. We don't really know yet because we don't           |
| 4  | know what the what the structure of those              |
| 5  | incentives is going to look like, but, you know, 4 to  |
| 6  | 5 million is a pretty small amount of money when you   |
| 7  | compare it to the overall budget that's being          |
| 8  | allocated for these programs.                          |
| 9  | So that's, you know, an estimate.                      |
| 10 | Q. And assuming your figures are fairly close          |
| 11 | to what results in the \$4 to \$5 million available to |
| 12 | IPL customers, those funds would be primarily targeted |
| 13 | to low-income customers; is that correct?              |
| 14 | A. That is my understanding, yes.                      |
| 15 | Q. Okay. Would you consider the \$4 to \$5             |
| 16 | million per year to be significant, as it relates to   |
| 17 | IPL's low-income program?                              |
| 18 | A. It could be.  |
| 19 | Q. What is the budget for that each year               |
| 20 | approximately?   |
| 21 | A. I'd have to look.                                   |
| 22 | Q. Could you do that?                                  |
| 23 | A. Yeah.   |
| 24 | (Brief pause.)   |
| 25 | Q. Do you know the annual budget?                      |
|    |  |

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| 1  | A. Yes.  |
|----|--|
| 2  | Q. Okay.   |
| 3  | A. It is around just under \$3 1/2 million per         |
| 4  | year. So yeah, that is significant.                    |
| 5  | Q. Would it potentially warrant the need to            |
| 6  | evaluate the goals for these programs and IPL's plan   |
| 7  | during the five-year plan?                             |
| 8  | A. It could. I mean, the goals were                    |
| 9  | established kind of in consideration of the historical |
| 10 | performance of the program and the capacity of the     |
| 11 | existing CAP agency partnerships, et cetera. So it     |
| 12 | certainly warrants a review to understand the          |
| 13 | implications.  |
| 14 | Q. The collaboration process involving the             |
| 15 | stakeholders that, I think, is contemplated for the    |
| 16 | Inflation Reduction Act, would it be appropriate in    |
| 17 | that collaboration process to consider whether a       |
| 18 | modification is needed?                                |
| 19 | A. Certainly to consider. I think that will            |
| 20 | be up to the collaborative to determine once the rules |
| 21 | are out and we know more.                              |
| 22 | Q. I would like to show you an exhibit that's          |
| 23 | marked OCA Hearing Exhibit 6. Rather, it should be     |
| 24 | marked OCA Hearing Exhibit 6.                          |
| 25 | MS. EASLER: And for everybody's records,               |

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| 1  | this is IPL's Response to OCA Data Request No. 59.    |
|----|---|
| 2  | PRESIDING OFFICER WRIGHT: While we're                 |
| 3  | passing it out, it's not actually marked so if        |
| 4  | everyone wants to keep track of it, you may want to   |
| 5  | mark it OCA Hearing Exhibit 6.                        |
| 6  | BY MS. EASLER:  |
| 7  | Q. Have you seen this data request response           |
| 8  | before, Ms. Ellsworth?                                |
| 9  | A. No.  |
| 10 | Q. I will take that up with the author at the         |
| 11 | appropriate time.                                     |
| 12 | A. Okay.  |
| 13 | PRESIDING OFFICER WRIGHT: Are you going to            |
| 14 | ask Ms. Gehrke that?                                  |
| 15 | MS. EASLER: Yes. It will still be                     |
| 16 | designated as our Hearing Exhibit 6, but I'll move it |
| 17 | through Ms. Gehrke.                                   |
| 18 | PRESIDING OFFICER WRIGHT: Okay.                       |
| 19 | BY MS. EASLER:  |
| 20 | Q. The plan allocation refers to IPL's                |
| 21 | proposed expansion of the low-income authorization    |
| 22 | program to what you identify now as limited-income    |
| 23 | customers; is that accurate?                          |
| 24 | A. That's correct.                                    |
| 25 | Q. And I believe in your plan it's referenced         |
|    |   |

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| 1  | as a pilot?  |
|----|--|
| 2  | A. Correct.  |
| 3  | Q. Okay. Are you familiar with the rules for           |
| 4  | pilots here in Iowa or pilot programs?                 |
| 5  | A. Yes.  |
| 6  | Q. Okay. Would you agree, subject to check,            |
| 7  | that Board Rule 199 IAC 35.5(4)(h) requires a utility  |
| 8  | proposed pilot to explore areas of innovation or       |
| 9  | unproven approaches?                                   |
| 10 | A. I'm not familiar with that section of the           |
| 11 | Code.  |
| 12 | Q. Okay. Turning to your reply testimony on            |
| 13 | page 7, lines 8 through 10, you indicate that IPL's    |
| 14 | limited-income component targets customers whose       |
| 15 | incomes are between 200 percent and 300 percent of the |
| 16 | federal poverty level.                                 |
| 17 | Are you aware of any programs in IPL's                 |
| 18 | earlier energy efficiency plans that targeted this     |
| 19 | group of customers?                                    |
| 20 | A. Yes. The Home Energy Savers Program from,           |
| 21 | I think, two cycles ago.                               |
| 22 | Q. And are you aware that it was discontinued          |
| 23 | due to cost-effectiveness considerations?              |
| 24 | A. Yes, I am.  |
| 25 | Q. Are you familiar with the Evaluation,               |
| 1  |  |

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| 1  | Monitoring and Verification report prepared by Itron |
|----|--|
| 2  | and filed in the plan when the last limited-income   |
| 3  | program was offered?                                 |
| 4  | A. Not in detail.                                    |
| 5  | Q. Did you work on Evaluation, Monitoring and        |
| 6  | Verification for IPL back in the 2014 to 2018 time   |
| 7  | frame?   |
| 8  | A. No, we've never been engaged as evaluation        |
| 9  | consultants for IPL.                                 |
| 10 | Q. I'm going to show you the report for this         |
| 11 | particular program, and it should be marked OCA      |
| 12 | Hearing Exhibit 9.                                   |
| 13 | MS. EASLER: Actually, everybody should               |
| 14 | mark their copies as OCA Hearing Exhibit 9.          |
| 15 | BY MS. EASLER:                                       |
| 16 | Q. My questions for you, Ms. Ellsworth, will         |
| 17 | focus on pages 1112 and 1114 of that report. Could   |
| 18 | you identify the title of the document?              |
| 19 | A. Sure. "IPL Energy Efficiency 2014 Home            |
| 20 | Energy Savers Program Evaluation."                   |
| 21 | Q. And on page 1112, could you please read the       |
| 22 | highlighted portion of that exhibit?                 |
| 23 | A. "The Home Energy Savers Program is designed       |
| 24 | to provide weatherization services to limited-income |
| 25 | customers who receive their electricity and heating  |
|    |  |

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| 1  | fuel from IPL and whose income is too high to qualify |
|----|---|
| 2  | for the state low-income weatherization program.      |
| 3  | Specifically, customers in the HES program must have  |
| 4  | income levels ranging from 200 percent to 300 percent |
| 5  | of the federal poverty level."                        |
| 6  | Q. Thank you. And then turning to page 1114,          |
| 7  | would you please read the highlighted portion of that |
| 8  | page.   |
| 9  | A. "There clearly is an opportunity and need          |
| 10 | for expanding the program. However, this is also a    |
| 11 | program that is less cost-effective than many others, |
| 12 | so any consideration of program expansion would need  |
| 13 | to be carefully weighed against other expansion       |
| 14 | opportunities and the portfolio's cost-effectiveness  |
| 15 | in general."  |
| 16 | Q. Thank you. That's all I have on that               |
| 17 | particular Hearing Exhibit 9. Since you don't have    |
| 18 | knowledge of it, I think I will enter that through    |
| 19 | Ms. Gehrke as well.                                   |
| 20 | I want to refer you now to Rebuttal                   |
| 21 | Exhibit 3 filed by CEDI, and that's the Clean Energy  |
| 22 | Districts of Iowa. If you don't have it, this perhaps |
| 23 | can be displayed up on the screen. In particular, I'm |
| 24 | looking at CEDI Data Request 20. Thank you.           |
| 25 | I apologize. The author for this request              |
|    |   |

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| 1  | is Mr. Velonis, but you're addressing the income       |
|----|--|
|    |  |
| 2  | qualifying   |
| 3  | A. That's fine. I'll answer, if I can.                 |
| 4  | Q. I'll deal with the clean-up. It's already           |
| 5  | in the record, so we're good. Okay.                    |
| 6  | In this data request Mr. Velonis provides              |
| 7  | year-by-year budget detail for these programs, and     |
| 8  | could you scroll down a bit on that detail? Okay.      |
| 9  | So for the single-family low-income, we can            |
| 10 | see what IPL is planning to spend for incentives and   |
| 11 | all the various aspects in the plan administration and |
| 12 | program administration for this component. Please      |
| 13 | scroll down further. Okay.                             |
| 14 | And then we see in Table 2 similar                     |
| 15 | additional detail is provided for the single-family    |
| 16 | limited-income program.                                |
| 17 | Do you see that?                                       |
| 18 | A. Yes.  |
| 19 | Q. And keep scrolling down. Thank you.                 |
| 20 | Okay. And this last Table 3 shows                      |
| 21 | multi-family and institutional low-income spending     |
| 22 | detail for that, the budget of that track of           |
| 23 | participation; correct?                                |
| 24 | A. Correct.  |
| 25 | Q. Will this level of detail be provided in            |
|    |  |

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| 1  | IPL's annual report information?                      |
|----|---|
| 2  | A. I think Ms. Gehrke could probably answer           |
| 3  | that question better than I can.                      |
| 4  | Q. Okay. Will you be maintaining this level           |
| 5  | of detail behind the scenes?                          |
| 6  | A. Cadmus works on the plan. We don't work on         |
| 7  | the EM&V or the reporting process, so that's a good   |
| 8  | question for Ms. Gehrke.                              |
| 9  | Q. You do, however, sponsor IPL's EM&V plan           |
| 10 | for this pilot; correct?                              |
| 11 | A. Yes.   |
| 12 | Q. And this is contained in the plan,                 |
| 13 | Exhibit 8, of IPL's application in this case?         |
| 14 | A. Yes.   |
| 15 | Q. I have one final hearing exhibit for you,          |
| 16 | and please mark it as OCA Hearing Exhibit 10. This is |
| 17 | your testimony from the last energy efficiency plan   |
| 18 | filing in 2018.                                       |
| 19 | A. Okay. Thank you.                                   |
| 20 | Q. If you would, turn to Well, I'll let you           |
| 21 | identify the title of the document.                   |
| 22 | PRESIDING OFFICER WRIGHT: Can we wait                 |
| 23 | until we get it up on the screen?                     |
| 24 | MS. EASLER: Certainly. Sorry.                         |
| 25 | PRESIDING OFFICER WRIGHT: Is it there? Go             |
|    |   |

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| 1  | ahead.   |
|----|--|
| 2  | BY MS. EASLER:   |
| 3  | Q. Ms. Ellsworth, can you identify what this           |
| 4  | document is?   |
| 5  | A. Yeah. Reply testimony of Amy W. Ellsworth.          |
| 6  | Q. So you are familiar with this document?             |
| 7  | A. Well, I was five years ago.                         |
| 8  | Q. Okay. I understand. Turning to page 15,             |
| 9  | I'm looking in particular at the question-and-answer   |
| 10 | that occurs starting at line 11.                       |
| 11 | And in this portion of your testimony,                 |
| 12 | you're responding to OCA's recommendation for IPL to   |
| 13 | devote more resources and future EM&V efforts to       |
| 14 | analyze the various awareness efforts' ability to      |
| 15 | drive actual program participation?                    |
| 16 | A. Correct.  |
| 17 | Q. Okay. And could you refer also now to your          |
| 18 | 2023 testimony, reply testimony, page 12? At this      |
| 19 | point of your testimony, are you responding to a       |
| 20 | similar recommendation from OCA Witness Tessier?       |
| 21 | A. Yes.  |
| 22 | Q. In your 2018 testimony, lines 17 through            |
| 23 | 20, you make the point that Evaluation, Monitoring and |
| 24 | Verification is especially important for programs and  |
| 25 | measures that may be falling short of their            |
| 1  |  |

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| 1  | participation targets, especially those that are       |
|----|--|
| 2  | considered high-impact program measures. Is that       |
| 3  | still your belief?                                     |
| 4  | A. Can you repeat the question? I'm sorry.             |
| 5  | Q. Sure. I'm referring to your 2018                    |
| 6  | testimony.   |
| 7  | A. Yes.  |
| 8  | Q. Lines 17 through 20.                                |
| 9  | A. Yep.  |
| 10 | Q. At that point you're making the point that          |
| 11 | Evaluation, Monitoring and Verification efforts should |
| 12 | focus on programs and measures that may be falling     |
| 13 | short of their participation targets, especially those |
| 14 | considered high-impact programs and measures?          |
| 15 | A. Yes.  |
| 16 | Q. Do you still agree with that testimony?             |
| 17 | A. Yes.  |
| 18 | Q. I apologize for jumping you back to 2023.           |
| 19 | We're still on your reply testimony on page 12, lines  |
| 20 | 18 through 21.   |
| 21 | Your response to Mr. Tessier on this                   |
| 22 | similar topic, you note at this point that IPL         |
| 23 | currently directs resources to analyze the             |
| 24 | effectiveness of marketing efforts through both        |
| 25 | internal tracking and, where appropriate, the efforts  |
| 1  |  |

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| 1  | of the third-party evaluation, monitoring and        |
|----|--|
| 2  | verification contractor?                             |
| 3  | A. That's correct.                                   |
| 4  | Q. With this testimony in mind and as the            |
| 5  | person responsible for helping IPL in sponsoring its |
| 6  | EM&V plan, do you agree it's important for IPL to    |
| 7  | track and report the performance of distinct         |
| 8  | components of its Energy Efficiency Demand Response  |
| 9  | for all its programs in its annual report?           |
| 10 | A. Track the performance of the programs?            |
| 11 | Q. Yes.  |
| 12 | A. Yes, and typically performance is related         |
| 13 | to participation. I think that's what you're getting |
| 14 | at.  |
| 15 | Q. Right. It's important for the Board and           |
| 16 | stakeholders to understand how the various tracks of |
| 17 | the program are performing in terms of spending, in  |
| 18 | terms of participation relative to your budget and   |
| 19 | goals for the program, would you agree?              |
| 20 | A. Yes.  |
| 21 | Q. And for IPL's Evaluation, Monitoring and          |
| 22 | Verification Plan, in Exhibit 8 you don't break out  |
| 23 | the low-income program from the limited-income       |
| 24 | program; is that correct?                            |
| 25 | A. Correct. In the EM&V plan?                        |
|    |  |

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| 1  | Q. Yes.  |
|----|--|
| 2  | A. I don't believe so. I can double-check.               |
| 3  | (Brief pause.)   |
| 4  | A. Yeah, that is correct.                                |
| 5  | Q. So are you proposing to do a combined EM&V            |
| 6  | for both of these tracks of programs?                    |
| 7  | A. So as I mentioned, Camdus does not perform            |
| 8  | the EM&V for IPL's program. It's generally considered    |
| 9  | a conflict of interest.                                  |
| 10 | What we put in the Energy Efficiency Plan                |
| 11 | is sort of a structure, right; a framework or broad      |
| 12 | outline for conducting $EM\&V$ , and then it would be up |
| 13 | to the actual contractor that IPL hires to develop a     |
| 14 | more specific plan for evaluating the programs, based    |
| 15 | on the objectives of that evaluation.                    |
| 16 | Q. Sure, but are you saying in your exhibit              |
| 17 | that you think this should be a combined EM&V analysis   |
| 18 | for both of those tracts, the low-income and the         |
| 19 | limited-income?  |
| 20 | A. Not necessarily. You know, we don't get to            |
| 21 | that level of detail.                                    |
| 22 | Q. Okay. And those actual EM&V plans had to              |
| 23 | be determined?   |
| 24 | A. That's right.   |
| 25 | MS. EASLER: Thank you. With that I would                 |
|    |  |

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| 5   |
|---|
| move admission of OCA Hearing Exhibit 10.       |
| (OCA Hearing Exhibit 10 was offered into        |
| the record.)                                    |
| PRESIDING OFFICER WRIGHT: Any objection to      |
| the admission of OCA Hearing Exhibit 10?        |
| MR. SOWDEN: IPL has no objection.               |
| MS. VAN LOON: No objection.                     |
| PRESIDING OFFICER WRIGHT: Ms. Herndon?          |
| MS. HERNDON: No objection.                      |
| PRESIDING OFFICER WRIGHT: Mr. Mandelbaum?       |
| MR. MANDELBAUM: No objection.                   |
| PRESIDING OFFICER WRIGHT: OCA                   |
| Exhibit No. 10 is admitted in the record.       |
| (OCA Hearing Exhibit 10 was admitted into       |
| the record.)                                    |
| MS. EASLER: Thank you. OCA has no further       |
| questions.                                      |
| PRESIDING OFFICER WRIGHT: Ms. Van Loon?         |
| MR. SOWDEN: What about OCA Hearing Exhibit      |
| 9? We referenced OCA Hearing Exhibit 9 multiple |
| times. In fact, we had the witness read it.     |
| MS. EASLER: That's correct. It's an EM&V        |
| report from a prior plan.                       |
| I can move it at this time, if you don't        |
| object?   |
|   |

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| 1  | MR. SOWDEN: I have no objection.                      |
|----|---|
| 2  | MS. EASLER: Okay.                                     |
| 3  | (OCA Hearing Exhibit 9 was offered into               |
| 4  | evidence.)  |
| 5  | PRESIDING OFFICER WRIGHT: Any objections              |
| 6  | to the admission of OCA Hearing Exhibit 9?            |
| 7  | (No response.)  |
| 8  | PRESIDING OFFICER WRIGHT: Hearing none,               |
| 9  | OCA's Hearing Exhibit 9 is admitted into the record.  |
| 10 | (OCA Hearing Exhibit 9 was admitted into              |
| 11 | the record.)  |
| 12 | PRESIDING OFFICER WRIGHT: Do you want the             |
| 13 | same thing with 6, or do you want to wait?            |
| 14 | MR. SOWDEN: We can wait for 6. Thank you.             |
| 15 | PRESIDING OFFICER WRIGHT: Okay.                       |
| 16 | Ms. Van Loon.   |
| 17 | MS. VAN LOON: No questions for this                   |
| 18 | witness, Your Honor.                                  |
| 19 | PRESIDING OFFICER WRIGHT: Ms. Herndon?                |
| 20 | MS. HERNDON: No questions for this                    |
| 21 | witness.  |
| 22 | PRESIDING OFFICER WRIGHT: Mr. Mandelbaum?             |
| 23 | MR. MANDELBAUM: No questions.                         |
| 24 | PRESIDING OFFICER WRIGHT: So I have maybe             |
| 25 | a couple, but first, explain your relationship to the |
| 1  |   |

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| 1  | Energy Efficiency Plan that is being proposed.         |
|----|--|
| 2  | I don't understand how you do EM&V and what            |
| 3  | you do with regard to that.                            |
| 4  | THE WITNESS: So I wrote the plan. We work              |
| 5  | with IPL to develop both the written report and the    |
| 6  | calculations that are in the plan.                     |
| 7  | PRESIDING OFFICER WRIGHT: So then you                  |
| 8  | continue with the plan through the five years?         |
| 9  | THE WITNESS: No. We provide Cadmus                     |
| 10 | provides some technical support to IPL, but our role   |
| 11 | is generally limited to the planning process itself.   |
| 12 | PRESIDING OFFICER WRIGHT: And then what's              |
| 13 | your relationship to the EM&V?                         |
| 14 | THE WITNESS: So Cadmus is a nationally                 |
| 15 | known evaluation consulting firm; however, in Iowa and |
| 16 | some other states, it's considered a conflict of       |
| 17 | interest to both design the programs and evaluate      |
| 18 | them. So we are generally not involved in the EM&V     |
| 19 | process in Iowa.                                       |
| 20 | PRESIDING OFFICER WRIGHT: Then what does               |
| 21 | the EM&V do that you don't do?                         |
| 22 | THE WITNESS: So the purpose of evaluation              |
| 23 | is to determine generally do the energy savings and    |
| 24 | demand reductions that are, you know, the utility's    |
| 25 | goals, are they being met? Like, we quantify energy    |
|    |  |

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| 1  | savings.   |
|----|--|
| 2  | And then there's generally a process on the            |
| 3  | evaluation side where we're evaluating how well those  |
| 4  | programs function and could they be improved, are      |
| 5  | there barriers not being addressed and those kind of   |
| 6  | things to try to optimize those programs to achieve    |
| 7  | their goals.   |
| 8  | PRESIDING OFFICER WRIGHT: So do you expect             |
| 9  | IPL to conduct an EM&V somewhere during the five       |
| 10 | years?   |
| 11 | THE WITNESS: Yes. They're required to                  |
| 12 | conduct at least one round of EM&V for each program    |
| 13 | during the five-year plan.                             |
| 14 | PRESIDING OFFICER WRIGHT: But you're not               |
| 15 | involved in that, at least for now?                    |
| 16 | THE WITNESS: Correct.                                  |
| 17 | PRESIDING OFFICER WRIGHT: So are you                   |
| 18 | involved, then, in making the determination of whether |
| 19 | a particular program is cost-effective?                |
| 20 | THE WITNESS: Yes, we calculate                         |
| 21 | cost-effectiveness.                                    |
| 22 | PRESIDING OFFICER WRIGHT: So as part of                |
| 23 | your requirements or your relationship with IPL, if a  |
| 24 | change is made to the plan that's being proposed, do   |
| 25 | you go back, and are you the one that calculates       |

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| 1  | whether that is still cost-effective? Would that      |
|----|---|
| 2  | change?   |
| 3  | THE WITNESS: It could if there's going to             |
| 4  | be a modification filed or something like that. They  |
| 5  | could engage us to conduct another round of           |
| 6  | cost-effectiveness.                                   |
| 7  | That's why we sort of maintain a technical            |
| 8  | assistance type of relationship with IPL.             |
| 9  | PRESIDING OFFICER WRIGHT: What I'm talking            |
| 10 | about is, the other parties have proposed several     |
| 11 | changes to the plan.                                  |
| 12 | THE WITNESS: Yes.                                     |
| 13 | PRESIDING OFFICER WRIGHT: So have you gone            |
| 14 | back and determined whether, if those proposals are   |
| 15 | accepted, that plan is still cost-effective?          |
| 16 | THE WITNESS: We have not done that                    |
| 17 | analysis.   |
| 18 | PRESIDING OFFICER WRIGHT: Would that be               |
| 19 | you or your company's job to do that?                 |
| 20 | THE WITNESS: If IPL elects to engage us to            |
| 21 | do that, yes, we certainly can.                       |
| 22 | PRESIDING OFFICER WRIGHT: So that's not               |
| 23 | part of what you're hired to do now?                  |
| 24 | THE WITNESS: Well, we are hired to help               |
| 25 | with the planning process, which includes EM&V. So if |

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|    | 5  |
|----|--|
| 1  | there was another, you know another a new plan       |
| 2  | filed, we would probably do the cost-effectiveness   |
| 3  | calculations, yes.                                   |
| 4  | PRESIDING OFFICER WRIGHT: As of now you              |
| 5  | have not done any calculations based upon any of the |
| 6  | other proposals that the other parties have made?    |
| 7  | THE WITNESS: That's correct. Correct.                |
| 8  | PRESIDING OFFICER WRIGHT: So I think                 |
| 9  | that's all I have.                                   |
| 10 | Do you have any cross-examination [sic]?             |
| 11 | MR. SOWDEN: I do have a couple redirect              |
| 12 | questions.   |
| 13 | PRESIDING OFFICER WRIGHT: Redirect, I                |
| 14 | mean.  |
| 15 | MR. SOWDEN: Can we pull up OCA Hearing               |
| 16 | Exhibit 9, please?                                   |
| 17 | REDIRECT EXAMINATION                                 |
| 18 | BY MR. SOWDEN:                                       |
| 19 | Q. Ms. Ellsworth, in OCA Hearing Exhibit 9,          |
| 20 | can you look to the bottom left-hand corner and read |
| 21 | the date of this report?                             |
| 22 | A. March 31, 2016.                                   |
| 23 | Q. Ms. Ellsworth, are you aware of a more            |
| 24 | recent EM&V report that addresses the limited-income |
| 25 | done by Opinion Dynamics?                            |
| 1  |  |

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| 1  | A. No, I'm not familiar. I think that has            |
|----|--|
| 2  | been done, but I'm not familiar with it.             |
| 3  | MR. SOWDEN: Thank you. I'll address it               |
| 4  | with Ms. Gehrke.                                     |
| 5  | PRESIDING OFFICER WRIGHT: Is that all?               |
| 6  | MR. SOWDEN: Yes, Your Honor.                         |
| 7  | PRESIDING OFFICER WRIGHT: Thank you. You             |
| 8  | may step down.                                       |
| 9  | THE WITNESS: Thank you, Your Honor.                  |
| 10 | PRESIDING OFFICER WRIGHT: You can call               |
| 11 | your next witness.                                   |
| 12 | MR. SOWDEN: Thank you, Your Honor. One               |
| 13 | second. I apologize.                                 |
| 14 | IPL now calls Aquila Velonis to the stand.           |
| 15 | PRESIDING OFFICER WRIGHT: Raise your right           |
| 16 | hand.  |
| 17 | AQUILA VELONIS,                                      |
| 18 | called as a witness by Interstate Power and Light    |
| 19 | Company, being first duly sworn by Presiding Officer |
| 20 | Wright, was examined and testified as follows:       |
| 21 | PRESIDING OFFICER WRIGHT: Have a seat.               |
| 22 | You may proceed.                                     |
| 23 | MR. SOWDEN: Thank you, Your Honor.                   |
| 24 |  |
| 25 |  |
|    |  |

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| 1  | DIRECT EXAMINATION                                     |
|----|--|
| 2  | BY MR. SOWDEN:   |
| 3  | Q. Good morning, Mr. Velonis. Could you                |
| 4  | please state your name and employer for the record?    |
| 5  | A. Aquila Velonis with The Cadmus Group.               |
| 6  | Q. What is your position with Cadmus?                  |
| 7  | A. Principal.  |
| 8  | Q. Are you the same Aquila Velonis who caused          |
| 9  | to be filed direct and reply testimony in this         |
| 10 | proceeding?  |
| 11 | A. I am.   |
| 12 | Q. Do you have any corrections or changes to           |
| 13 | your prefiled testimony?                               |
| 14 | A. I do not.   |
| 15 | Q. If I were to ask you all of the questions           |
| 16 | in your testimony today under oath, would you give the |
| 17 | same answers?  |
| 18 | A. I would.  |
| 19 | MR. SOWDEN: Your Honor, with the                       |
| 20 | understanding that Mr. Velonis's prefiled testimony    |
| 21 | has been entered into the record, Interstate Power and |
| 22 | Light Company tenders Mr. Velonis for questions from   |
| 23 | the parties or you.                                    |
| 24 |  |
| 25 |  |

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| 1  | CROSS-EXAMINATION                                      |
|----|--|
| 2  | BY MS. EASLER:   |
| 3  | Q. Good morning, Mr. Velonis.                          |
| 4  | A. Good morning.                                       |
| 5  | Q. You sponsored IPL's application plan,               |
| 6  | Exhibit 1?   |
| 7  | A. I do.   |
| 8  | Q. You also sponsor the plan budget; correct?          |
| 9  | A. I do, yes.  |
| 10 | Q. According to  |
| 11 | MR. SOWDEN: Mr. Hearing Officer, can we                |
| 12 | check to see if his microphone is on?                  |
| 13 | PRESIDING OFFICER WRIGHT: It has to be                 |
| 14 | pushed and green, and you have to kind of lean into it |
| 15 | so everyone can hear you.                              |
| 16 | THE WITNESS: Okay. Will do.                            |
| 17 | PRESIDING OFFICER WRIGHT: Okay.                        |
| 18 | BY MS. EASLER:   |
| 19 | Q. According to IPL's plan application,                |
| 20 | Exhibit 1, at page 28 they should be able to pull      |
| 21 | it up for you, too, on the screen.                     |
| 22 | PRESIDING OFFICER WRIGHT: You should be                |
| 23 | able to see it on your monitor, too.                   |
| 24 | MS. EASLER: Page 28, please. Thank you.                |
| 25 | Perfect.   |
| 1  |  |

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| 1  | BY MS. EASLER:   |
|----|--|
| 2  | Q. Okay. Section 3.2 discusses IPL's planned           |
| 3  | savings and costs, and at this portion of the exhibit, |
| 4  | they're talking about the plan to spend \$236,724,318; |
| 5  | correct?   |
| 6  | A. Correct.  |
| 7  | Q. And has that budget number proposed by IPL          |
| 8  | changed?   |
| 9  | A. No, not that I'm aware of.                          |
| 10 | Q. Are you not planning to spend more for the          |
| 11 | demand response programs?                              |
| 12 | A. Not that I'm aware of. This might be a              |
| 13 | question for Ms. Gehrke.                               |
| 14 | Q. Are you aware of Ms. Gehrke's testimony in          |
| 15 | this case? You did some analysis in your May 3rd       |
| 16 | reply analyzing a new budget proposal.                 |
| 17 | A. In regards to the interruptible program?            |
| 18 | Is that what you're referring to?                      |
| 19 | Q. Yes.  |
| 20 | A. Okay. Thank you for clarifying.                     |
| 21 | Yes, this is the what you're seeing is                 |
| 22 | the planned budget without that examination of the     |
| 23 | interruptible program, yes.                            |
| 24 | Q. Right. And do you know how much additional          |
| 25 | spending IPL proposes each year for that interruptible |

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| 1  | program?  |
|----|---|
| 2  | A. Let me see if that was in my reply.                |
| 3  | Q. It's not.  |
| 4  | A. It's not? Okay. I don't know if I know             |
| 5  | exactly that estimate.                                |
| 6  | I know that the amount Well, we might                 |
| 7  | have to revisit. I don't know.                        |
| 8  | Q. Okay. You provide ongoing technical                |
| 9  | support for IPL's current energy efficiency programs; |
| 10 | is that correct?                                      |
| 11 | A. I do.  |
| 12 | Q. In this capacity do you assist with IPL's          |
| 13 | preparation of the annual energy efficiency report    |
| 14 | submissions?  |
| 15 | A. I do.  |
| 16 | Q. And you sponsor IPL's Assessment of                |
| 17 | Potential analysis; is that correct?                  |
| 18 | A. I do. Our firm did not conduct the                 |
| 19 | potential, but I sponsor it.                          |
| 20 | Q. Moving to your direct testimony at pages 2         |
| 21 | to 3, you discuss at this point how IPL has used the  |
| 22 | Assessment of Potential for its planned development?  |
| 23 | A. That's correct.                                    |
| 24 | Q. And you state the assessment quantified the        |
| 25 | amount of energy that could be saved in IPL's         |
|    |   |

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| 1  | territory under three potential scenarios?             |
|----|--|
| 2  | A. That's correct.                                     |
| 3  | Q. A reference an existing case and reference          |
| 4  | a new and a high case?                                 |
| 5  | A. That's correct.                                     |
| 6  | Q. Are the new program elements described by           |
| 7  | Witness Gehrke in her direct testimony the same as the |
| 8  | new programs considered in the Assessment of Potential |
| 9  | reference new case?                                    |
| 10 | A. In the The new case, an Assessment of               |
| 11 | Potential, it looks at existing programs and expanding |
| 12 | those measures within those existing programs. That    |
| 13 | is the new scenario or the new case in the assessment. |
| 14 | The high scenario looked at new programs in            |
| 15 | addition to the expansion of existing programs and new |
| 16 | measures.  |
| 17 | Q. Can you talk about the new programs that            |
| 18 | were examined in that high scenario?                   |
| 19 | A. In the high scenario, I can Let me refer            |
| 20 | to the Assessment of Potential. Hold on.               |
| 21 | (Brief pause.)   |
| 22 | A. The new programs consist of mid-stream              |
| 23 | programs and strategic energy management, I believe.   |
| 24 | Q. Are those new programs for IPL?                     |
| 25 | A. The mid-stream program is currently under a         |
|    |  |

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| 1  | pilot, and the EM&V program is under the new plan.    |
|----|---|
| 2  | Q. So it's an avenue for program                      |
| 3  | administration that IPL has been using in the current |
| 4  | plan; is that correct?                                |
| 5  | A. Under a pilot.                                     |
| 6  | Q. Under a pilot?                                     |
| 7  | A. Yes.   |
| 8  | Q. And would that have been considered in the         |
| 9  | reference case?                                       |
| 10 | A. No, it would not.                                  |
| 11 | Q. Okay. And did it consider the strategic            |
| 12 | energy management program?                            |
| 13 | A. Both the strategic energy management and           |
| 14 | the mid-stream programs were only my understanding    |
| 15 | is only in the high scenario.                         |
| 16 | Q. And there are particular aspects of the            |
| 17 | mid-stream that were kind of focused on for the new   |
| 18 | program opportunity for IPL in the Assessment of      |
| 19 | Potential?  |
| 20 | A. In the Assessment of Potential, it                 |
| 21 | primarily focused on HVAC and lighting mid-stream.    |
| 22 | Q. And it would be HVAC for the residential;          |
| 23 | correct?  |
| 24 | A. That's correct, and mid-stream lighting for        |
| 25 | nonresidential.                                       |
| 1  |   |

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| 1  | Q. And the Assessment of Potential does not           |
|----|---|
| 2  | consider the impacts of the Federal Inflation         |
| 3  | Reduction Act; is that correct?                       |
| 4  | A. That's my understanding.                           |
| 5  | Q. Are you familiar with the Inflation                |
| 6  | Reduction Act?  |
| 7  | A. I'm not an expert, but I'm familiar, yes.          |
| 8  | Q. Okay. Based on the type of incentives to           |
| 9  | be provided in the Inflation Reduction Act and your   |
| 10 | knowledge of IPL's plan, do you think the Inflation   |
| 11 | Reduction Act could significantly increase the        |
| 12 | achievable electric energy efficiency potential for   |
| 13 | IPL's low- and moderate-income customers?             |
| 14 | A. It wouldn't change the technical potential         |
| 15 | available. It could change the rate of adoption and   |
| 16 | the speed of which customers could participate.       |
| 17 | So it's not going to change the technical             |
| 18 | sort of potential available, but it could change the  |
| 19 | speed of the adoption.                                |
| 20 | Q. And if it speeds the adoption rate, that           |
| 21 | would increase the impacts of the spending that occur |
| 22 | in that particular aspect?                            |
| 23 | A. It could, yes.                                     |
| 24 | Q. Okay. Section 4 of the application,                |
| 25 | Exhibit 1, which is the main application, identifies  |

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| 1  | that the plan offers a range of programmatic options   |
|----|--|
| 2  | that includes rebates, direct install measures, and    |
| 3  | technical and technical assistance.                    |
| 4  | PRESIDING OFFICER WRIGHT: Wait just a                  |
| 5  | minute until we locate that. I'm sorry. Wait just a    |
| 6  | minute while we locate that.                           |
| 7  | Do you have it? Okay. Go ahead.                        |
| 8  | BY MS. EASLER:   |
| 9  | Q. Okay. I'm talking about that first                  |
| 10 | paragraph there and that the plan offers a range of    |
| 11 | options, including technical assistance.               |
| 12 | A. Yes.  |
| 13 | Q. What type of technical assistance is                |
| 14 | available to residential customers in the plan?        |
| 15 | A. I believe there's technical assistance.             |
| 16 | I'd have to refer I believe there's technical          |
| 17 | assistance for I may not be the best person to         |
| 18 | answer this question for low-income customers, but I   |
| 19 | would have to confirm, and I'm referring to the energy |
| 20 | awareness and education program in particular there.   |
| 21 | Q. So is there technical assistance in the             |
| 22 | form of service that's available to customers to       |
| 23 | assist with their understanding of maybe the decision  |
| 24 | to implement a geothermal heat pump?                   |
| 25 | A. That's probably a question for IPL staff to         |
|    |  |

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| 1  | answer or Ms. Gehrke.                                  |
|----|--|
| 2  | Q. I'm still in the application, Exhibit 1,            |
| 3  | page 40, please, and I have a hearing exhibit. So      |
| 4  | that will give you some time to get grounded.          |
| 5  | MS. EASLER: This should be marked OCA                  |
| 6  | Hearing Exhibit 1. Could you scroll up a bit on page   |
| 7  | 40? Thank you. I'm sorry. Page 37.                     |
| 8  | BY MS. EASLER:   |
| 9  | Q. So as I understand it, IPL will maintain            |
| 10 | program operations and report program participation    |
| 11 | benefits, costs and cost-effectiveness at the sector   |
| 12 | level for the efficient products track?                |
| 13 | A. In reference to the annual reporting?               |
| 14 | Q. Yes.  |
| 15 | A. Yes.  |
| 16 | Q. So in looking at OCA Hearing Exhibit 1,             |
| 17 | this is a subset of the annual report information. Do  |
| 18 | you recognize that?                                    |
| 19 | A. I do.   |
| 20 | Q. Okay. So when we see, for example, on the           |
| 21 | second page of that Appendix A, the impact analysis    |
| 22 | breaks out the non-res and the residential             |
| 23 | prescriptive rebates in terms of participation and     |
| 24 | achievements relative to them as well as your spending |
| 25 | relative to plan?                                      |

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| 1  | A. That's correct.                                     |
|----|--|
| 2  | Q. For the res and non-res sectors?                    |
| 3  | A. Yes. In this case it's both residential             |
| 4  | and nonresidential as well.                            |
| 5  | Q. Would that level of detail continue to              |
| 6  | accompany your reporting for the annual reports?       |
| 7  | A. It may. It may be not be at a sector                |
| 8  | level. It may be at the program level, but it could    |
| 9  | be at the It's to be determined, I suppose.            |
| 10 | Q. So it might be less detail than we're               |
| 11 | seeing today about participation?                      |
| 12 | A. It will still have the same level of                |
| 13 | granularity in terms of the program on a program level |
| 14 | certainly.   |
| 15 | Q. And the program itself is what?                     |
| 16 | A. The programs in the new plan.                       |
| 17 | Q. Well, we're talking about the Efficient             |
| 18 | Products Program; right?                               |
| 19 | A. Yes.  |
| 20 | Q. And that is the type of details I'm asking          |
| 21 | about in this question. Will we see this level of      |
| 22 | detail for that?                                       |
| 23 | A. If the Efficiency Products Program was              |
| 24 | separated by sector?                                   |
| 25 | Q. Yes.  |
|    |  |

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| 1  | A. I see. It certainly can.                           |
|----|---|
| 2  | Q. We will see it broken out by res and               |
| 3  | non-res?  |
| 4  | A. That is a determination that IPL will              |
| 5  | ultimately have, but I know we can, we could.         |
| 6  | Q. Okay. That's good to know.                         |
| 7  | And part of what you file each year is                |
| 8  | cost-effectiveness results as well; right?            |
| 9  | A. That's correct.                                    |
| 10 | Q. And will you run cost-effectiveness results        |
| 11 | for both the res and non-res parts of this program?   |
| 12 | A. Separately?  |
| 13 | Q. Yes, separately.                                   |
| 14 | A. That is a good question. Again, that would         |
| 15 | be under really the determination of how we are going |
| 16 | to run cost-effectiveness for the programs, if we're  |
| 17 | going to break them out at a sector level.            |
| 18 | Again, we could.                                      |
| 19 | Q. Okay. And on the last page of OCA Hearing          |
| 20 | Exhibit 1 is just an example I'm sorry for the size   |
| 21 | of the font, everyone of the cost-effectiveness       |
| 22 | analysis for a program that was provided in your most |
| 23 | recent filing, your most recent annual report?        |
| 24 | A. Yes, this looks familiar.                          |
| 25 | Q. So you file that for all of the different          |
| 1  |   |

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| 1  | programs that IPL currently runs?                      |
|----|--|
| 2  | A. That's correct.                                     |
| 3  | Q. Okay. Turning now to the plan application,          |
| 4  | Exhibit 1, page 52, I'd like to talk now about the     |
| 5  | Efficient Services Program. Can you go up just a bit?  |
| 6  | For this program we have two sectors again,            |
| 7  | residential and nonresidential, and four different     |
| 8  | components of what today would be separate plans or    |
| 9  | separate programs. I'm sorry.                          |
| 10 | So the components are Home Energy Reports,             |
| 11 | Business Energy Solutions, Appliance Recycling and     |
| 12 | Commercial New Construction. In the current plan       |
| 13 | those would be separate programs?                      |
| 14 | A. In the current plan, yes, they would be             |
| 15 | separate programs.                                     |
| 16 | Q. Okay. And in what you're proposing, now             |
| 17 | they're all a part of the Efficient Services Program?  |
| 18 | A. That's correct.                                     |
| 19 | Q. Okay. And so in the reporting that you              |
| 20 | help IPL provide each year, the annual report, will we |
| 21 | be able to tell how much participation and savings     |
| 22 | occurs in the Appliance Recycling component?           |
| 23 | A. At the component level?                             |
| 24 | Q. Yes.  |
| 25 | A. Yes, I believe that will be tracked. Yes.           |
|    |  |

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| 1  | Q. Will that be presented in the filing that       |
|----|--|
|    |  |
| 2  | IPL makes for their annual report?                 |
| 3  | A. Upon confirmation with IPL, I suspect that.     |
| 4  | Q. But you track that information?                 |
| 5  | A. That is typical information that is             |
| 6  | provided to us for us to do our cost-effectiveness |
| 7  | analysis.  |
| 8  | Q. Okay. You would also track that                 |
| 9  | information from the commercial new construction   |
| 10 | separately?  |
| 11 | A. That's also correct.                            |
| 12 | Q. You would track that separately for the         |
| 13 | Business Energy Solutions?                         |
| 14 | A. Yes, as well as issue reports.                  |
| 15 | Q. And would you report those results              |
| 16 | separately for the residential and nonresidential  |
| 17 | sectors?   |
| 18 | A. We can. If that data provided is to be          |
| 19 | broken out by sector, it can be.                   |
| 20 | Q. And   |
| 21 | A. We have the data.                               |
| 22 | Q. Would you run cost-effectiveness analyses       |
| 23 | for each of these separate components?             |
| 24 | A. The inputs for the separate components are      |
| 25 | required to run cost-effectiveness. We would we    |
|    |  |

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| r  |  |
|----|--|
| 1  | could have Yes, we could have.                     |
| 2  | Q. You can do it?                                  |
| 3  | A. We can do it.                                   |
| 4  | Q. Okay. Are you familiar with the                 |
| 5  | cost-effectiveness performance of these components |
| 6  | individually?                                      |
| 7  | A. Not I have a general recollection of the        |
| 8  | results, but I do not know the exact               |
| 9  | cost-effectiveness.                                |
| 10 | Q. But you provided the cost-effectiveness         |
| 11 | analysis in the company, IPL's plan; correct?      |
| 12 | A. That's correct.                                 |
| 13 | Q. All right. And are you aware of the             |
| 14 | cost-effectiveness of the Home Energy Reports?     |
| 15 | A. Of the exact number, no, but I know that        |
| 16 | it that particular component did not pass the      |
| 17 | societal cost test.                                |
| 18 | Q. Did it pass any of the cost tests?              |
| 19 | A. I would have to refer.                          |
| 20 | Q. And I have that as the last page of OCA         |
| 21 | Hearing Exhibit 1.                                 |
| 22 | A. Okay. In the 2022 annual report, none of        |
| 23 | the cost tests for homeowners it didn't pass it.   |
| 24 | Q. That's consistent with my understanding.        |
| 25 | Okay.  |
| 1  |  |

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| 1  | Ms. Ellsworth testified that the qualified           |
|----|--|
| 2  | income programs, their budget each year is in excess |
| 3  | of 3 million?  |
| 4  | A. As she testified earlier, yes.                    |
| 5  | Q. And the budget for the Home Energy Reports        |
| 6  | is how much?   |
| 7  | A. I'd have to refer.                                |
| 8  | (Brief pause.)                                       |
| 9  | A. Thank you. I didn't have that in my               |
| 10 | docket.  |
| 11 | The Home Energy Reports budget is roughly            |
| 12 | \$1 million per year.                                |
| 13 | Q. Okay. So over \$4 million of IPL's plan is        |
| 14 | for noncost-effective programs; correct?             |
| 15 | A. That's correct. For Home Energy Reports,          |
| 16 | roughly \$5.2 million.                               |
| 17 | Q. 5.2 is the total, but I mean just in a            |
| 18 | given year. So IPL's budget for residential?         |
| 19 | A. I see.  |
| 20 | Q. The residential plan is                           |
| 21 | A. It's  |
| 22 | Q about \$8 million?                                 |
| 23 | PRESIDING OFFICER WRIGHT: Let her ask the            |
| 24 | question before you respond, okay?                   |
| 25 | BY MS. EASLER:                                       |
| 1  |  |

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| 1  | Q. By my estimation IPL is proposing to spend         |
|----|---|
| 2  | more than half of its residential budget on programs  |
| 3  | that are not cost-effective?                          |
| 4  | A. On the residential sector without                  |
| 5  | confirming that exact value, yes.                     |
| 6  | Q. Subject to check?                                  |
| 7  | A. Yes.   |
| 8  | Q. And then I want to speed things along for          |
| 9  | you. I don't know that you need to look at this       |
| 10 | directly, but you can. It's Exhibit 2, page 49.       |
| 11 | It talks about the Residential Behavioral             |
| 12 | Program and then the Assessment of Potential. As I    |
| 13 | understand it, the Residential Behavioral Program was |
| 14 | the Home Energy Report.                               |
| 15 | Is that consistent with your understanding?           |
| 16 | A. The Residential Behavioral Program? That's         |
| 17 | correct.  |
| 18 | Q. And in the Assessment of Potential go up           |
| 19 | just a little bit. Thank you.                         |
| 20 | Did that demonstrate a positive                       |
| 21 | benefit/cost result, and it was noted as exempt from  |
| 22 | the Assessment of Potential Benefit-Cost Analysis     |
| 23 | because it's an educational program; is that correct? |
| 24 | A. According to the Assessment of Potential,          |
| 25 | that's what it says in the last sentence.             |
| 1  |   |

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| 1  | Q. Okay. And IPL does not offer the Home               |
|----|--|
| 2  | Energy Reports or this behavioral program as part of   |
| 3  | its Energy Awareness Program?                          |
| 4  | A. That's correct. It's in the services                |
| 5  | program.   |
| 6  | Q. Right. And the energy and awareness and             |
| 7  | education plan, those are all exempt from              |
| 8  | cost-effectiveness screens as well?                    |
| 9  | A. That's right; the educational components as         |
| 10 | well as the low-income components.                     |
| 11 | Q. I'm getting close to the end. I want to             |
| 12 | turn now to your application, Exhibit 3. That is the   |
| 13 | analysis that you sponsored, the benefit/cost          |
| 14 | analysis. I'm sorry. It's a really it's a big          |
| 15 | exhibit to open, so it might take a moment to get it   |
| 16 | popped up.   |
| 17 | I'm particularly interested in the VC table            |
| 18 | tab.   |
| 19 | PRESIDING OFFICER WRIGHT: Why don't we go              |
| 20 | off the record and make sure we get the right exhibit. |
| 21 | (Discussion was held off the record.)                  |
| 22 | PRESIDING OFFICER WRIGHT: Okay. Back on                |
| 23 | the record.  |
| 24 | BY MS. EASLER:   |
| 25 | Q. Okay. On this tab you can kind of hang              |
|    |  |

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| 1  | right you show the portfolio results without IQ and   |
|----|---|
| 2  | EA and with IQ and EA. Can you tell me what IQ and EA |
| 3  | are?  |
| 4  | A. IQ is income qualified and EA is education         |
| 5  | awareness.  |
| 6  | Q. And those are programs that are not                |
| 7  | required to be cost-effective under Iowa's policy;    |
| 8  | correct?  |
| 9  | A. That's my understanding.                           |
| 10 | Q. In looking at that, the exclusion of               |
| 11 | noncost-effective programs from your benefit/cost     |
| 12 | analysis tends to improve the overall portfolio       |
| 13 | analysis; is that correct?                            |
| 14 | A. That is correct.                                   |
| 15 | Q. I would like to show you a hearing exhibit.        |
| 16 | It is marked OCA Hearing Exhibit 3. I'll let you      |
| 17 | identify it once it's handed out.                     |
| 18 | Mr. Velonis, are you able to identify this?           |
| 19 | A. Yes.   |
| 20 | Q. What is OCA Hearing Exhibit 3?                     |
| 21 | A. This is a data request response, Data              |
| 22 | Request No. 28.                                       |
| 23 | Q. And you authored this response?                    |
| 24 | A. I did.   |
| 25 | Q. Okay. In particular I'm interested in your         |
| 1  |   |

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| 1  | response in kind of the last sentence there or the   |
|----|--|
| 2  | second-to-the-last sentence.                         |
| 3  | A. Yes.  |
| 4  | Q. Okay. So you note the addition of labor           |
| 5  | and operation costs to a program budget without      |
| 6  | increasing savings benefits would lower              |
| 7  | cost-effectiveness of the program; is that accurate? |
| 8  | A. That is accurate, to add more dollars and         |
| 9  | not increase savings.                                |
| 10 | Q. Okay. And with that in mind, I'd like to          |
| 11 | turn to your reply testimony at page 7. Okay. Scroll |
| 12 | down a bit.  |
| 13 | So at this point in your testimony you're            |
| 14 | talking about the updated benefit/cost analysis you  |
| 15 | ran based on the new nonresidential demand response, |
| 16 | the additional spending for that program, for the    |
| 17 | interruptible program?                               |
| 18 | A. That's correct.                                   |
| 19 | Q. And you also filed an exhibit supporting          |
| 20 | what you show here?                                  |
| 21 | A. That's correct.                                   |
| 22 | Q. So IPL is proposing to spend, subject to          |
| 23 | check, about \$12 million additional per year on the |
| 24 | Non-Residential Demand Response Program?             |
| 25 | A. Subject to check.                                 |
| 1  |  |

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|    | -   |
|----|---|
| 1  | Q. And with that added operational cost, I was    |
| 2  | somewhat expecting to see that the benefit/cost   |
| 3  | results would go down, but they did not?          |
| 4  | A. They did not, no. There are two reasons        |
| 5  | for that.   |
| 6  | First is that the avoided energy costs            |
| 7  | well, it was avoided capacity costs changed.      |
| 8  | Q. Could you be specific?                         |
| 9  | A. That will I don't know exactly the             |
| 10 | details off the top of my head here.              |
| 11 | I know that that will be discussed in later       |
| 12 | testimony with Adrianna.                          |
| 13 | Q. Adrianna Iano?                                 |
| 14 | A. Yes.   |
| 15 | Q. Okay.  |
| 16 | A. The second component to this is that the       |
| 17 | this is an inclusion of both summer and winter    |
| 18 | benefits, and the prior or the originally filed   |
| 19 | document just looked at summer. So there were     |
| 20 | additional benefits that were added.              |
| 21 | Q. So are you modeling the same 149 customers     |
| 22 | and interruptible capacity in your reply exhibit? |
| 23 | A. It's the same 149, but it also includes a      |
| 24 | component or a number of the customers also       |
| 25 | participating in the winter events. So there's    |
|    |   |

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| 1  | additional benefits associated with that.             |
|----|---|
| 2  | Q. Are customers currently required to be             |
| 3  | interrupted year-round, if IPL calls for an           |
| 4  | interruption?   |
| 5  | A. It's probably best answered by Ms. Gehrke.         |
| 6  | She's more familiar with the program operation.       |
| 7  | Q. Okay. So you're not as familiar with the           |
| 8  | way the program operates?                             |
| 9  | A. Not as much as she is.                             |
| 10 | Q. Okay. So in your model you assumed you             |
| 11 | were getting more capacity for the winter period than |
| 12 | you thought initially?                                |
| 13 | A. Initially we did not look at the winter            |
| 14 | capacity benefits in the original plan.               |
| 15 | Q. Okay. I think I'll leave it at that and            |
| 16 | take it up with the next person.                      |
| 17 | MS. EASLER: I would move admission of OCA             |
| 18 | Hearing Exhibit 1 and OCA Hearing Exhibit 3.          |
| 19 | (OCA Hearing Exhibits 1 and 3 were offered            |
| 20 | into evidence.)                                       |
| 21 | PRESIDING OFFICER WRIGHT: Any objection to            |
| 22 | the admission of OCA Hearing Exhibits 1 and 3?        |
| 23 | MR. SOWDEN: IPL has no objection.                     |
| 24 | MS. VAN LOON: No objection.                           |
| 25 | PRESIDING OFFICER WRIGHT: When I ask and              |
|    |   |

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if nobody responds, I will assume there is no 1 2 objection. 3 OCA Hearing Exhibits 1 and 3 are admitted 4 into the record. 5 (OCA Hearing Exhibits 1 and 3 were admitted into evidence.) 6 7 MS. EASLER: I have no further questions. 8 PRESIDING OFFICER WRIGHT: Ms. Van Loon. 9 MS. VAN LOON: Thank you, Your Honor. Ι 10 actually have an exhibit. 11 PRESIDING OFFICER WRIGHT: So do you have a hearing exhibit number for this? 12 13 MS. VAN LOON: This will be LEG 1. 14 PRESIDING OFFICER WRIGHT: Okay. You may 15 proceed. MS. VAN LOON: Thank you, Your Honor. 16 17 CROSS-EXAMINATION 18 BY MS. VAN LOON: 19 Mr. Velonis, do you recognize the response 0. 20 to Large Energy Group Data Request No. 5? 21 Α. I do. 22 Are you the author of that response? Q. 23 Α. I am. 24 Okay. I'd like to direct your attention to Q. 25 the first paragraph under "Response," and in

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| 1  | particular the second sentence. Can you read that      |
|----|--|
| 2  | second sentence to me? It begins, "The participant."   |
| 3  | A. "The participant cost assumption (75                |
| 4  | percent of incentives) represents the value of service |
| 5  | lost and transaction costs as part of being a demand   |
| 6  | response participant during an event."                 |
| 7  | Q. Could you say more about what that means?           |
| 8  | A. Certainly. So this a to account for the             |
| 9  | loss of services or operational time that a facility   |
| 10 | may be down during an event. So there may be loss of   |
| 11 | service during a demand response event, and there      |
| 12 | could be a cost associated to that.                    |
| 13 | So this is to account for those costs when             |
| 14 | conducting the cost-effectiveness analysis.            |
| 15 | Q. Thank you.  |
| 16 | MS. VAN LOON: At this time I would move                |
| 17 | for the admission of LEG Exhibit 1.                    |
| 18 | (LEG Hearing Exhibit 1 was offered into                |
| 19 | evidence.)   |
| 20 | PRESIDING OFFICER WRIGHT: Is there any                 |
| 21 | objection to LEG Hearing Exhibit 1?                    |
| 22 | (No response.)   |
| 23 | PRESIDING OFFICER WRIGHT: Hearing none,                |
| 24 | that exhibit is admitted into the record.              |
| 25 |  |
| 1  |  |

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| 1  | (LEG Hearing Exhibit 1 was admitted into               |
|----|--|
| 2  | evidence.)   |
| 3  | MS. VAN LOON: Thank you, Your Honor. I                 |
| 4  | have no further questions for this witness.            |
| 5  | PRESIDING OFFICER WRIGHT: Okay.                        |
| 6  | Ms. Herndon.   |
| 7  | MS. HERNDON: I have no questions.                      |
| 8  | MR. MANDELBAUM: No questions.                          |
| 9  | PRESIDING OFFICER WRIGHT: So I need to go              |
| 10 | over the testimony with staff, so we'll take about ten |
| 11 | minutes, and I will see if I have any questions for    |
| 12 | Mr. Velonis, okay?                                     |
| 13 | So we're off the record.                               |
| 14 | (Recess taken.)  |
| 15 | PRESIDING OFFICER WRIGHT: We're back on                |
| 16 | the record. So I think we're at the point where if I   |
| 17 | have any questions for Mr. Velonis, I think I'm going  |
| 18 | to go back to the one I asked Ms. Ellsworth.           |
| 19 | Have you done any updated or any analysis              |
| 20 | of the cost-effectiveness of the program based upon    |
| 21 | any of the proposed modifications or revisions that    |
| 22 | are proposed by the other parties?                     |
| 23 | THE WITNESS: Only that I'm aware of in my              |
| 24 | reply testimony relating to the interruptible program. |
| 25 | PRESIDING OFFICER WRIGHT: Okay. Would you              |
|    |  |

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| 1  | be the one to do that, if that's required?             |
|----|--|
| 2  | THE WITNESS: I would.                                  |
| 3  | PRESIDING OFFICER WRIGHT: Can you kind of              |
| 4  | go back I know I asked Ms. Ellsworth, but can you      |
| 5  | explain Cadmus's relationship to IPL and then your     |
| 6  | relationship to the program yourself that's being      |
| 7  | proposed?  |
| 8  | THE WITNESS: Certainly. Cadmus and my                  |
| 9  | role for the plan is to I'm really the numbers guy.    |
| 10 | So I provide the assumptions and calculations          |
| 11 | associated to the cost-effectiveness. Our team is      |
| 12 | putting together the budgets and the savings           |
| 13 | projections for the plan.                              |
| 14 | PRESIDING OFFICER WRIGHT: And then what's              |
| 15 | the relationship of the IPL witnesses or the IPL       |
| 16 | personnel to what you do?                              |
| 17 | THE WITNESS: So in terms of the plan, as               |
| 18 | well as ongoing, we work together in developing an     |
| 19 | Energy Efficiency Plan. After the plan is finalized,   |
| 20 | I provide technical support for program staff.         |
| 21 | They may have some questions about the plan            |
| 22 | or questions about any sort of it could be any sort    |
| 23 | of technical question about a particular project that  |
| 24 | they're working on, and I also am a member of the      |
| 25 | technical reference committee that does the TRM, which |
|    |  |

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| 1  | is a deemed a savings document that all the IOUs       |
|----|--|
| 2  | follow.  |
| 3  | PRESIDING OFFICER WRIGHT: And then you                 |
| 4  | have a continuing relationship with IPL; correct?      |
| 5  | THE WITNESS: I do, yes.                                |
| 6  | PRESIDING OFFICER WRIGHT: If I understood              |
| 7  | your response on cross-examination, you either develop |
| 8  | or you help with the annual report; is that correct?   |
| 9  | THE WITNESS: I help with the                           |
| 10 | cost-effectiveness of the annual report. So IPL        |
| 11 | provides us that prior year's participation, the       |
| 12 | savings and the budget spent for that prior year, and  |
| 13 | we run cost-effectiveness analysis on that to develop  |
| 14 | the annual report.                                     |
| 15 | PRESIDING OFFICER WRIGHT: Okay. If during              |
| 16 | that period IPL decides to modify the plan, then you   |
| 17 | would be the one to determine whether those            |
| 18 | modifications are cost-effective?                      |
| 19 | THE WITNESS: Yes, that has happened in the             |
| 20 | past.  |
| 21 | PRESIDING OFFICER WRIGHT: Okay. I think                |
| 22 | that's all I have.                                     |
| 23 | Redirect?  |
| 24 | MR. SOWDEN: Just a couple quick questions.             |
| 25 |  |
|    |  |

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| 1  | REDIRECT EXAMINATION                                   |
|----|--|
| 2  | BY MR. SOWDEN:   |
| 3  | Q. First, can we turn to Mr. Velonis's direct          |
| 4  | testimony on page 2? Right there.                      |
| 5  | Mr. Velonis, when the Office of Consumer               |
| 6  | Advocate was asking you questions, they asked you if   |
| 7  | you sponsored the application, Exhibit 1, that is the  |
| 8  | plan, and you said yes. Were you mistaken?             |
| 9  | A. Yes. Thank you for clarifying.                      |
| 10 | Q. Thank you. So can you explain why the Home          |
| 11 | Energy Reports doesn't pass cost-effectiveness?        |
| 12 | A. I can. So the Home Energy Reports Program,          |
| 13 | it's a behavioral-based program, and the lifetime      |
| 14 | of well, the one of the primary reasons why it         |
| 15 | does not pass is because the savings from a behavioral |
| 16 | response typically last about a year.                  |
| 17 | So compared to other energy efficiency                 |
| 18 | measures, those energy efficiency measures may last    |
| 19 | multiple years. You know, ten or 15 years.             |
| 20 | Since a behavioral response is a shorter               |
| 21 | time frame, the benefits do not persist, and as a      |
| 22 | result, the cost-effectiveness for Home Energy Reports |
| 23 | often it's not just IPL but often in other             |
| 24 | jurisdictions Home Energy Reports are not              |
| 25 | cost-effective.  |

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| 1  | Q. And so Home Energy Reports or programs like         |
|----|--|
| 2  | that are typical programs used by other utilities      |
| 3  | outside of just Interstate Power and Light Company?    |
| 4  | A. That's correct.                                     |
| 5  | Q. Then one final question. Is workforce               |
| 6  | training cost-effective?                               |
| 7  | A. No.   |
| 8  | MR. SOWDEN: Okay. Thank you.                           |
| 9  | PRESIDING OFFICER WRIGHT: I apologize, but             |
| 10 | your redirect caused me to ask a couple more           |
| 11 | questions.   |
| 12 | THE WITNESS: Sure.                                     |
| 13 | PRESIDING OFFICER WRIGHT: So can you                   |
| 14 | explain why the behavioral change is only for one      |
| 15 | year? If someone maybe I've got behavioral and         |
| 16 | Let's go back.   |
| 17 | What are the behavioral changes you expect?            |
| 18 | Is that just people reducing their usage?              |
| 19 | THE WITNESS: Yes, and it is through really             |
| 20 | a sort of an educational component through either mail |
| 21 | or e-mail communications to the customers. It tends    |
| 22 | to be sort of a comparative sort of a comparative      |
| 23 | approach where, "Hey, your neighbor is essentially     |
| 24 | consuming this much or neighbors essentially, and this |
| 25 | is where your home stacks up comparatively."           |
| 1  |  |

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| 1  | And so it can be informative for a customer            |
|----|--|
| 2  | to want to either beat or try to lower their energy    |
| 3  | use. There's also educational tips for customers to    |
| 4  | lower their energy use.                                |
| 5  | But if those educational components do not             |
| 6  | persist, if they end after a year or, you know,        |
| 7  | there's less likely of a persistence of those energy   |
| 8  | savings, you know, people may forget to do those       |
| 9  | things in the future.                                  |
| 10 | So it's As a conservative assumption,                  |
| 11 | one year is a value that we have used. There are       |
| 12 | instances where you could assume maybe additional      |
| 13 | years, one or two years of persistence, but considered |
| 14 | less, it's one year.                                   |
| 15 | PRESIDING OFFICER WRIGHT: So the                       |
| 16 | behavioral aspect of it, then, is different than if    |
| 17 | they went out and bought a more efficient air          |
| 18 | conditioner?   |
| 19 | THE WITNESS: Air conditioner, exactly. An              |
| 20 | air conditioner will have an effective useful life of, |
| 21 | like, 15 years, so you can have savings persisting     |
| 22 | that long.   |
| 23 | PRESIDING OFFICER WRIGHT: Thank you.                   |
| 24 | That's all I had. You may step town.                   |
| 25 | THE WITNESS: Thank you.                                |
|    |  |

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| 1  | PRESIDING OFFICER WRIGHT: You may call               |
|----|--|
| 2  | your next witness.                                   |
| 3  | MR. SOWDEN: Thank you, Your Honor.                   |
| 4  | Interstate Power and Light Company calls Kari Gehrke |
| 5  | to the stand.  |
| 6  | PRESIDING OFFICER WRIGHT: Raise your right           |
| 7  | hand.  |
| 8  | KARI T. GEHRKE,                                      |
| 9  | called as a witness by Interstate Power and Light    |
| 10 | Company, being first duly sworn by Presiding Officer |
| 11 | Wright, was examined and testified as follows:       |
| 12 | PRESIDING OFFICER WRIGHT: Have a seat.               |
| 13 | You may proceed.                                     |
| 14 | MR. SOWDEN: Thank you.                               |
| 15 | DIRECT EXAMINATION                                   |
| 16 | BY MR. SOWDEN:                                       |
| 17 | Q. Good morning, Ms. Gehrke.                         |
| 18 | A. Good morning.                                     |
| 19 | Q. Could you please state your name and              |
| 20 | employer for the record?                             |
| 21 | A. Kari T. Gehrke with Alliant Energy.               |
| 22 | Q. And what is your position with Alliant            |
| 23 | Energy?  |
| 24 | A. I'm the manager of demand side management.        |
| 25 | Q. Are you the same Kari Gehrke who filed or         |
|    |  |

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| 1  | caused to be filed direct and reply testimony in this |
|----|---|
| 2  | proceeding?   |
| 3  | A. Yes.   |
| 4  | Q. Do you have any corrections or changes to          |
| 5  | your prefiled testimony?                              |
| 6  | A. No.  |
| 7  | Q. If I were to ask you all the questions in          |
| 8  | your testimony today under oath, would you give the   |
| 9  | same answers?   |
| 10 | A. Yes.   |
| 11 | MR. SOWDEN: Your Honor, I do have one                 |
| 12 | question that would be additional direct, and it's    |
| 13 | meant to correct an error in the record but an error  |
| 14 | that has been repeated in others' testimony.          |
| 15 | PRESIDING OFFICER WRIGHT: So is it an                 |
| 16 | error in today, or is it an error in prefiled?        |
| 17 | MR. SOWDEN: No, it's an error in                      |
| 18 | surrebuttal testimony.                                |
| 19 | PRESIDING OFFICER WRIGHT: Okay.                       |
| 20 | BY MR. SOWDEN:  |
| 21 | Q. In response of surrebuttal testimony in            |
| 22 | Kruger, page 5, line 19                               |
| 23 | MS. EASLER: I'm sorry. What are you                   |
| 24 | referencing?  |
| 25 | MR. SOWDEN: We're trying to correct an                |
|    |   |

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| 1  | error of fact that has been introduced in testimony.  |
|----|---|
| 2  | It's not the fault of OCA's witness. It's the fault   |
| 3  | of, I guess, an unclear response by IPL in a data     |
| 4  | request, and we just want to correct it.              |
| 5  | MS. EASLER: Okay.                                     |
| 6  | PRESIDING OFFICER WRIGHT: Okay.                       |
| 7  | BY MR. SOWDEN:  |
| 8  | Q. So on page 5, line 19 of OCA Kruger's              |
| 9  | surrebuttal testimony, he references the number of    |
| 10 | limited households IPL intends to serve over the life |
| 11 | of the plan.  |
| 12 | PRESIDING OFFICER WRIGHT: Let us get that             |
| 13 | up.   |
| 14 | BY MR. SOWDEN:  |
| 15 | Q. He also then references Clean Energy               |
| 16 | Districts of Iowa's direct testimony, and that then   |
| 17 | references a data request that was answered by        |
| 18 | Interstate Power and Light Company.                   |
| 19 | Can you please clarify that number?                   |
| 20 | A. Yeah. In response to the CEDI data request         |
| 21 | asking for participation levels, we provided one      |
| 22 | number, 76, but didn't clarify it was annual          |
| 23 | participation rather than the cumulative not the      |
| 24 | cumulative plan participation as it was assumed by    |
| 25 | Witness Martin-Schramm and further by OCA Witness     |
|    |   |

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| 1  | Kruger. We want to clarify it's 76 per year, not 76    |
|----|--|
| 2  | for the total plan.                                    |
| 3  | Q. So 76 times 5?                                      |
| 4  | A. Correct.  |
| 5  | MR. SOWDEN: Thank you. Your Honor, with                |
| 6  | the understanding that Ms. Gehrke's prefiled testimony |
| 7  | has been admitted into the record, Interstate Power    |
| 8  | and Light Company tenders Ms. Gehrke for questions     |
| 9  | from the parties and the presiding officer.            |
| 10 | PRESIDING OFFICER WRIGHT: Okay. Thank                  |
| 11 | you.   |
| 12 | Ms. Johnson or Ms. Easler.                             |
| 13 | CROSS-EXAMINATION                                      |
| 14 | BY MR. EASLER:   |
| 15 | Q. Good morning, Ms. Gehrke. While it's still          |
| 16 | fresh in my mind, I'd like to do some follow-up on     |
| 17 | that point of clarification.                           |
| 18 | So you would be doing 75 homes for the                 |
| 19 | limited-income?  |
| 20 | A. Seventy-six per year.                               |
| 21 | Q. Seventy-six per year. Okay. According to            |
| 22 | the additional information supplied by IPL on          |
| 23 | December 2, 2022, you provided eligible participation  |
| 24 | data.  |
| 25 | Do you recall that?                                    |
|    |  |

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| 1  | A. Not specifically, but                               |
|----|--|
| 2  | Q. Okay. Would you accept, subject to check,           |
| 3  | that IPL indicated it has 75,264 moderate to           |
| 4  | low-income let's see. Well, I'll just let that         |
| 5  | information speak for itself. Okay.                    |
| 6  | PRESIDING OFFICER WRIGHT: So is it in the              |
| 7  | record?  |
| 8  | MS. EASLER: Well, that's a good question.              |
| 9  | It was filed, and it satisfies the minimum filing      |
| 10 | requirement. I assume it's in the record.              |
| 11 | MR. SOWDEN: IPL believes that became part              |
| 12 | of the application because it was in response to staff |
| 13 | questions to meet the minimum filing requirements, so  |
| 14 | yes, I would believe that it would be a part of the    |
| 15 | record.  |
| 16 | MS. EASLER: Okay. Good enough.                         |
| 17 | PRESIDING OFFICER WRIGHT: That's an                    |
| 18 | interesting question. So to make sure that at least    |
| 19 | I'm satisfied, I will take what you're saying is it    |
| 20 | was provided in response to an order of the Board; is  |
| 21 | that correct? Is it filed                              |
| 22 | MR. SOWDEN: It was a staff letter, I                   |
| 23 | believe.   |
| 24 | PRESIDING OFFICER WRIGHT: A staff letter?              |
| 25 | MR. SOWDEN: Yes.                                       |
|    |  |

IN RE: INTERSTATE POWER AND LIGHT COMPANY HEARING 06/08/2023

| 1  | PRESIDING OFFICER WRIGHT: Do you have the             |
|----|---|
| 2  | date?   |
| 3  | MR. SOWDEN: I can quickly get it.                     |
| 4  | PRESIDING OFFICER WRIGHT: Okay.                       |
| 5  | MR. BAKER: Your Honor, we believe the                 |
| 6  | staff letter was dated November 14th of 2022.         |
| 7  | PRESIDING OFFICER WRIGHT: And the                     |
| 8  | response?   |
| 9  | MR. BAKER: Staff believes the response is             |
| 10 | December 2, 2022.                                     |
| 11 | PRESIDING OFFICER WRIGHT: And those are in            |
| 12 | the Electronic Filing System?                         |
| 13 | MR. SOWDEN: Yes.                                      |
| 14 | PRESIDING OFFICER WRIGHT: Ms. Easler, if              |
| 15 | you don't have objection, I'm going to take official  |
| 16 | notice if nobody has an objection, I'll take          |
| 17 | official notice of the documents to make sure if they |
| 18 | need to be referenced that they are in the record.    |
| 19 | MS. EASLER: No objection.                             |
| 20 | PRESIDING OFFICER WRIGHT: Okay. I assume              |
| 21 | no one else has an objection to that?                 |
| 22 | (No response.)  |
| 23 | BY MS. EASLER:  |
| 24 | Q. Ms. Gehrke, I'd like to take up some items         |
| 25 | deferred to you by Ms. Ellsworth.                     |
|    |   |

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| 2 associated with the Inflation Reduction Act-funded<br>3 programs, my question is: Do you think it would be<br>4 appropriate for IPL to report on the impacts of the<br>5 Inflation Reduction Act on Interstate's Energy |
|---|
| 4 appropriate for IPL to report on the impacts of the   |
|   |
| 5 Inflation Reduction Act on Interstate's Energy  |
|   |
| 6 Efficiency Plan and programs?   |
| 7 A. I think to the extent that they're known to  |
| 8 us, that we could quantify them, that that would be   |
| 9 something we would include in the annual reports on an  |
| 10 ongoing basis to the extent we're able to quantify.  |
| 11 Q. Thank you. I also presented Ms. Ellsworth   |
| 12 with a document that was marked OCA Hearing Exhibit 6.   |
| 13 It's IPL's response to OCA Data Request 59?  |
| 14 A. Yes.  |
| 15 Q. You are the author of that data request?  |
| 16 A. Yes.  |
| 17 Q. Have you had an opportunity to review this  |
| 18 exhibit?   |
| 19 A. Yes.  |
| 20 Q. Does it appear to be a true and accurate  |
| 21 copy of your response to OCA's data request?   |
| 22 A. Yes.  |
| 23 MS. EASLER: I would move admission of OCA  |
| 24 Hearing Exhibit 6.   |
| 25  |

IN RE: INTERSTATE POWER AND LIGHT COMPANY HEARING 06/08/2023

| 1  | (OCA Hearing Exhibit 6 was offered into               |
|----|---|
| 2  | evidence.)  |
| 3  | PRESIDING OFFICER WRIGHT: Any objection to            |
| 4  | the admission of OCA Hearing Exhibit 6?               |
| 5  | (No response.)  |
| 6  | PRESIDING OFFICER WRIGHT: Hearing none,               |
| 7  | that exhibit is admitted into the record.             |
| 8  | (OCA Hearing Exhibit 6 was admitted into              |
| 9  | evidence.)  |
| 10 | BY MS. EASLER:  |
| 11 | Q. One other item I was discussing with               |
| 12 | Ms. Ellsworth is whether it would be appropriate for  |
| 13 | IPL to track and report the performance of distinct   |
| 14 | components of your energy efficiency and demand       |
| 15 | response portfolio in your annual filing.             |
| 16 | A. Yes.   |
| 17 | Q. And your answer to that question is yes?           |
| 18 | A. I recall the question, and yes, it would be        |
| 19 | our intention to continue to file a similar level of  |
| 20 | detail as we do currently. It may be a mixture of     |
| 21 | component and pathway to get the appropriate sort of  |
| 22 | matching level of detail.                             |
| 23 | We haven't completed that full mapping                |
| 24 | exercise yet, but we'd expect to have a check-in with |
| 25 | the parties to confirm everyone agrees that the level |
|    |   |

IN RE: INTERSTATE POWER AND LIGHT COMPANY HEARING 06/08/2023

| 1  | of detail is appropriate.                              |
|----|--|
| 2  | Q. Okay. Thank you. Well, that speeds a lot            |
| 3  | of things up.  |
| 4  | Would that also extend to the                          |
| 5  | cost-effectiveness analysis that you supply? You       |
| 6  | would provide that for the different components of     |
| 7  | your program?  |
| 8  | A. Yes, we would match with the impact it's            |
| 9  | been reporting in detail.                              |
| 10 | Q. Okay. Great. All right.                             |
| 11 | Turning to your reply testimony at page 8,             |
| 12 | you are discussing here the collaboration efforts that |
| 13 | IPL has been engaged in and the Energy Efficiency Plan |
| 14 | in the past. You note on page 9 that IPL sees great    |
| 15 | benefit in these collaborations.                       |
| 16 | My question is: Would it be IPL's intent               |
| 17 | to continue with these collaborative efforts?          |
| 18 | A. Yes, I think to the extent that we have             |
| 19 | participated in collaboration meetings, such as the    |
| 20 | annual report in the fall operations and other topical |
| 21 | meetings as requested by the parties, that we would    |
| 22 | continue to do so.                                     |
| 23 | Q. And perhaps, you know, if there is a topic          |
| 24 | like the IRA-funding opportunities and their impact on |
| 25 | IPL's programs, that that would maybe be a             |
|    |  |

## IN RE: INTERSTATE POWER AND LIGHT COMPANY HEARING 06/08/2023

| 1  | collaboration, you know, that you wouldn't wait for    |
|----|--|
| 2  | the parties to initiate?                               |
| 3  | I mean, that is something that will occur              |
| 4  | regularly throughout your plan, would you imagine?     |
| 5  | A. Well, I would imagine so, and I offer that          |
| 6  | we've already commenced that activity between the      |
| 7  | investor-owned utilities guided by the Iowa Utilities  |
| 8  | Association and the cooperatives and municipalities    |
| 9  | and Office of Consumer Advocate with the State Energy  |
| 10 | Office. I would say that activity has already          |
| 11 | commenced.   |
| 12 | Q. Okay. So kind of a key item of importance           |
| 13 | for the low-income programs is training of workforce   |
| 14 | implementers and auditors who are able to deliver the  |
| 15 | low-income programs. Would you agree?                  |
| 16 | A. Yes, that's been identified as a key                |
| 17 | opportunity.   |
| 18 | Q. And one of OCA's concerns expressed in its          |
| 19 | testimony is, you know, we're concerned there isn't a  |
| 20 | plan to do that training yet. Are you concerned about  |
| 21 | the time it might take to develop that type of         |
| 22 | curriculum?  |
| 23 | A. I'm not concerned because I don't believe           |
| 24 | the intention is to develop new curriculum but rather  |
| 25 | to provide funding and support for additional training |

IN RE: INTERSTATE POWER AND LIGHT COMPANY HEARING 06/08/2023

| 1  | that's already available rather than developing new  |
|----|--|
| 2  | training curriculum. I think that is the direction   |
| 3  | that the CAP agencies have suggested.                |
| 4  | Q. So is this training that could have been          |
| 5  | occurring this year?                                 |
| 6  | A. I guess there's not a reason I don't              |
| 7  | have a reason why we haven't started yet except that |
| 8  | the parties haven't come to an agreement yet. It's,  |
| 9  | of course, a collaborative effort with IDHR.         |
| 10 | MidAmerican is also participating, so it's           |
| 11 | not a solo exercise for IPL.                         |
| 12 | Q. I have a hearing exhibit, and it is marked        |
| 13 | OCA Hearing Exhibit 7. It's IPL's response to OCA    |
| 14 | Data Request 55.                                     |
| 15 | Ms. Gehrke, can you identify this document?          |
| 16 | A. It's the OCA Data Request No. 55 and IPL's        |
| 17 | response.  |
| 18 | Q. Does this appear to be a true and accurate        |
| 19 | copy of your response to this data request?          |
| 20 | A. Yes.  |
| 21 | MS. EASLER: I would move admission of OCA            |
| 22 | Hearing Exhibit 7.                                   |
| 23 | (OCA Hearing Exhibit 7 was offered into              |
| 24 | evidence.)   |
| 25 | PRESIDING OFFICER WRIGHT: Any objection to           |
|    |  |

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| 1  | OCA Hearing Exhibit 7?                                |
|----|---|
| 2  | (No response.)  |
| 3  | PRESIDING OFFICER WRIGHT: Hearing none,               |
| 4  | that exhibit is admitted into the record.             |
| 5  | (OCA Hearing Exhibit 7 was admitted into              |
| 6  | evidence.)  |
| 7  | BY MS. EASLER:  |
| 8  | Q. Exhibit 8 to your plan lays out a time line        |
| 9  | for the EM&V Evaluation, Monitoring and Verification  |
| 10 | Plan?   |
| 11 | A. Yes.   |
| 12 | Q. Will IPL seek the input of interested              |
| 13 | stakeholders in its selection of a vendor to provide  |
| 14 | the EM&V work?  |
| 15 | A. Well, IPL retains the ultimate                     |
| 16 | responsibility for selecting that vendor. I think it  |
| 17 | has been our past practice to at least discuss with   |
| 18 | the stakeholders, and we continue to follow past      |
| 19 | practice.   |
| 20 | Q. We asked about the performance or OCA asked        |
| 21 | Interstate about the performance of IPL's program and |
| 22 | meeting savings goal for the agricultural customers.  |
| 23 | This is OCA Data Request 56.                          |
| 24 | MS. EASLER: I will offer that as Hearing              |
| 25 | Exhibit 5, and it needs to be marked as such.         |
|    |   |

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| 1  | (OCA Hearing Exhibit 5 was offered into                |
|----|--|
| 2  | evidence.)   |
| 3  | PRESIDING OFFICER WRIGHT: I apologize.                 |
| 4  | What hearing exhibit?                                  |
| 5  | MS. EASLER: OCA Hearing Exhibit 5.                     |
| 6  | PRESIDING OFFICER WRIGHT: I notice it says             |
| 7  | "Confidential/Trade Secrets" at the top. Is that just  |
| 8  | a  |
| 9  | MR. SOWDEN: It is not confidential. If it              |
| 10 | is confidential, IPL would mark that box.              |
| 11 | PRESIDING OFFICER WRIGHT: Oh, I get it.                |
| 12 | The box isn't marked. Okay.                            |
| 13 | Okay. Go ahead.  |
| 14 | BY MS. EASLER:   |
| 15 | Q. All right. Ms. Gehrke, does this appear to          |
| 16 | be a true and accurate copy of your response to OCA    |
| 17 | Data Request 56?                                       |
| 18 | A. Yes.  |
| 19 | Q. And on the last page of this document, you          |
| 20 | show the budget and savings goals for the agricultural |
| 21 | sector?  |
| 22 | A. Yes.  |
| 23 | Q. Will this type of detail be continued to be         |
| 24 | reported in your annual reports?                       |
| 25 | A. Yes.  |
| 1  |  |

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| 1  | Q. Thank you.  |
|----|--|
| 2  | MS. EASLER: I move admission of OCA                    |
| 3  | Hearing Exhibit 5.                                     |
| 4  | PRESIDING OFFICER WRIGHT: Any objections               |
| 5  | to the admission of OCA Hearing Exhibit 5?             |
| 6  | (No response.)   |
| 7  | PRESIDING OFFICER WRIGHT: Hearing none,                |
| 8  | that exhibit is admitted into the record.              |
| 9  | (OCA Hearing Exhibit 5 was admitted into               |
| 10 | evidence.)   |
| 11 | BY MS. EASLER:   |
| 12 | Q. Ms. Gehrke, I had some discussions in my            |
| 13 | cross-examination of Mr. Velonis on the Home Energy    |
| 14 | Reports. Because they are, you know, in the            |
| 15 | Assessment of Potential, they were treated as          |
| 16 | educational programs that would be exempt from         |
| 17 | benefit/cost review.                                   |
| 18 | I'm wondering if you can shed light on why             |
| 19 | you're including that particular program in the        |
| 20 | Efficient Services rather than including it in the     |
| 21 | Education and Awareness tract where those programs are |
| 22 | exempt from benefit/cost review?                       |
| 23 | A. Would it be possible to put that potential          |
| 24 | assessment sheet back up there?                        |
| 25 | Q. Sure. The Assessment of Potential is                |

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| 1  | Exhibit 2 at page 49.                                  |
|----|--|
| 2  | A. I'm sorry. Can you scroll slightly up to            |
| 3  | the So I would say the distinction for IPL and why     |
| 4  | we would not move it down to an educational program is |
| 5  | that we claim savings for the Home Energy Reports,     |
| 6  | which is why it has a cost-effectiveness score at      |
| 7  | all.   |
| 8  | All of the programs that we have in the                |
| 9  | energy education and awareness we do not claim any     |
| 10 | savings from, so that's why we've left it in the       |
| 11 | Efficient Services. Even though it's a one-year        |
| 12 | savings, you have to treat it as a one-year saving.    |
| 13 | That's why we left it in services as                   |
| 14 | opposed to moving it into education. That's a general  |
| 15 | distinction across the plan; anything that's the       |
| 16 | claimed savings where we're calculating                |
| 17 | cost-effectiveness and services as opposed to          |
| 18 | education and awareness.                               |
| 19 | Q. Okay. It would be your intent to report             |
| 20 | separately on the cost-effectiveness analysis for the  |
| 21 | Home Energy Reports and the other residential          |
| 22 | component of the Efficient Services that applies to    |
| 23 | the cycle?   |
| 24 | A. Yes.  |
| 25 | Q. I would like to direct your attention now           |
|    |  |

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| 1  | to your energy efficiency application, Exhibit 1, at   |
|----|--|
| 2  | page 41. This is regarding the smart thermostats.      |
| 3  | I'm sorry. It's page 46.                               |
| 4  | A. Okay. Thank you.                                    |
| 5  | Q. Maybe this isn't specific to smart                  |
| 6  | thermostats, this table. Is it?                        |
| 7  | A. No, it's not.                                       |
| 8  | Q. Okay. There is a budget there for                   |
| 9  | installation, and I wondered if you could tell me what |
| 10 | that's used for.                                       |
| 11 | A. One moment. I don't know without doing              |
| 12 | some additional research exactly what that             |
| 13 | installation line points to. Sorry.                    |
| 14 | Q. One of the stakeholders in the energy               |
| 15 | efficiency collaboration leading up to your planned    |
| 16 | filing had requested that installation be offered as   |
| 17 | part of the smart thermostat product offering in your  |
| 18 | plan.  |
| 19 | Do you recall that?                                    |
| 20 | A. I'm generally aware, yes.                           |
| 21 | Q. And you have not elected to make that               |
| 22 | particular support available in your proposed program? |
| 23 | A. It's not available in the efficient                 |
| 24 | products or specifically in the demand response, but   |
| 25 | we have proposed it in the income-qualified programs   |
| 1  |  |

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| 1  | to provide and install a smart thermostat in all of    |
|----|--|
| 2  | homes that we treat, both single-family and            |
| 3  | multi-family, with pre-enrollment and demand response  |
| 4  | where applicable.                                      |
| 5  | I think we haven't precluded the idea for              |
| 6  | demand response if we aren't able to achieve the       |
| 7  | participation numbers we're looking to get, but I      |
| 8  | think it's a prudent first choice to offer the         |
| 9  | incentives without installation and see if we can      |
| 10 | achieve the goals, the participation goals             |
| 11 | first.   |
| 12 | Q. And the incentive you offer for the smart           |
| 13 | thermostat is \$100; correct?                          |
| 14 | A. Under the products.                                 |
| 15 | Q. Under the efficient products?                       |
| 16 | A. Correct.  |
| 17 | Q. And that's a pretty significant incentive           |
| 18 | in relation to the product cost, would you agree?      |
| 19 | A. It is. We generally limit it to 50 percent          |
| 20 | of the product cost outside of promotional periods,    |
| 21 | but generally speaking, it's \$100 up to 50 percent of |
| 22 | the cost of the product.                               |
| 23 | Q. Do you have any sense of where this one             |
| 24 | comes in in that range, the \$100 in relation to the   |
| 25 | cost of a smart thermostat?                            |
| 1  |  |

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| 1  | A. I think they can range from \$150 up to \$200       |
|----|--|
| 2  | to \$250, depending on the brand and the unit. Each    |
| 3  | brand has even some varying levels of units.           |
| 4  | Q. And one other area of question that got             |
| 5  | deferred to you came from Mr. Velonis. I think I       |
| 6  | asked him about the plan application, Exhibit 1,       |
| 7  | indicating that it offered technical assistance to     |
| 8  | customers.   |
| 9  | I asked him what type of technical                     |
| 10 | assistance is available to the residential sector.     |
| 11 | A. Yeah. I'd suggest that the online home              |
| 12 | energy assessments provide technical assistance to a   |
| 13 | residential customer. It would provide                 |
| 14 | recommendations, based on their feedback, as to their  |
| 15 | home heating and cooling system and opportunities that |
| 16 | they're interested in.                                 |
| 17 | It would point back to IPL products either             |
| 18 | in the mid-stream or on the marketplace that a         |
| 19 | customer could select.                                 |
| 20 | Q. Okay. But you don't offer an actual                 |
| 21 | service of helping a customer act on energy efficiency |
| 22 | options outside of that online information?            |
| 23 | A. We do not have an in-person option, I mean,         |
| 24 | other than if a customer would call into the Alliant   |
| 25 | Energy Call Center. Certainly they have some           |
|    |  |

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| 1  | opportunity to walk customers through opportunities or |
|----|--|
| 2  | point them to different rebates, but, of course,       |
| 3  | they're not typical experts.                           |
| 4  | Q. I saved the best for last. Demand                   |
| 5  | response, the interruptible program.                   |
| 6  | Your direct testimony at page 8, lines 9               |
| 7  | through 15, is IPL's initial filing. It stands on the  |
| 8  | interruptible credit; is that correct?                 |
| 9  | A. I think on page 11, if I track? Can you             |
| 10 | point me to a page?                                    |
| 11 | Q. I thought it was page 8. Were we there?             |
| 12 | A. Oh, I'm sorry. Yes on page 8, line 9. I             |
| 13 | see it now. Thank you.                                 |
| 14 | Q. Okay. So at this point your filing did not          |
| 15 | alter the interruptible credit; is that correct? Your  |
| 16 | initial filing?  |
| 17 | A. The initial filing followed what was filed          |
| 18 | in the current heap, yes.                              |
| 19 | Q. And IPL's current interruptible credit is           |
| 20 | based on the methodology that IPL proposed and the     |
| 21 | Board accepted in your last Energy Efficiency Docket   |
| 22 | No. 2018-0003?   |
| 23 | A. Correct.  |
| 24 | Q. This methodology incorporated a short-term          |
| 25 | and long-term market value for capacity translated     |
|    |  |

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| 1 into a monthly bill credit; is that correct?           |
|--|
| 2 A. Yes.  |
| 3 Q. The short-term value used in this                   |
| 4 methodology was derived from MISO's capacity planning  |
| 5 reserve option price for 2018; is that correct?        |
| 6 A. It was derived from the forecast of what            |
| 7 the option would close at, not the actual option       |
| 8 close.   |
| 9 Q. The 2018 option?                                    |
| 10 A. I believe it was. At the time we were              |
| 11 using the forecast for the option as opposed to the   |
| 12 option close.   |
| 13 Q. The accepted methodology in that case              |
| 14 weighted the two capacity values at a ratio of 85:15, |
| 15 given the majority of the wait for the longer-term    |
| 16 value of the demand response; is that correct?        |
| 17 A. Yes.   |
| 18 Q. And the 15 percent was the weighting for           |
| 19 the short-term capacity value; is that correct?       |
| 20 A. Correct.   |
| 21 Q. In the new interruptible credit that you           |
| 22 propose in your reply testimony on May 3rd, does that |
| 23 incorporate a short-term capacity value?              |
| 24 A. It does not.                                       |
| 25 Q. Did IPL submit its proposed changes to the         |

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| 1  | interruptible tariff as part of its energy efficiency  |
|----|--|
| 2  | filing?  |
| 3  | A. We did not.   |
| 4  | MS. EASLER: I would like to put in the                 |
| 5  | record your current tariff for the interruptible       |
| 6  | service option, and please mark, everybody, this as    |
| 7  | OCA Hearing Exhibit 8.                                 |
| 8  | BY MS. EASLER:   |
| 9  | Q. So I would note that IPL's current tariff           |
| 10 | offers a credit level that factors in a summer and     |
| 11 | winter credit rate; is that correct?                   |
| 12 | A. Yes.  |
| 13 | Q. Turning to your reply testimony at page 4,          |
| 14 | lines 11 through 14, at this point in your testimony   |
| 15 | you estimate that the impact of this change will cause |
| 16 | the incentive budget to increase to approximately      |
| 17 | \$28 million annually for the interruptible credit     |
| 18 | program.   |
| 19 | What incentive budget did IPL officially               |
| 20 | propose for this program on an annual basis?           |
| 21 | A. It was approximately 16 million.                    |
| 22 | Q. And how many customers are enrolled in the          |
| 23 | current interruptible program approximately?           |
| 24 | A. Mid-140s. It varies year by year a bit.             |
| 25 | Q. And as I understood your reply testimony at         |
|    |  |

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| r  |   |
|----|---|
| 1  | page 4, lines 1 through 4, you don't expect the       |
| 2  | increased credit to change participation in the       |
| 3  | program?  |
| 4  | A. I don't expect the number of customers to          |
| 5  | change, no, not necessarily.                          |
| 6  | Q. Do you propose to make any changes to the          |
| 7  | tariff operating procedures for the program, and      |
| 8  | that's the decision rules that are on page 2 and 3 of |
| 9  | the exhibit I distributed?                            |
| 10 | A. We do not.   |
| 11 | Q. You don't propose any other substantive            |
| 12 | changes to the tariff terms?                          |
| 13 | A. I think the different changes were the             |
| 14 | credit level of summer and the winter firm and        |
| 15 | extending the period of the contract from three years |
| 16 | to five years but not the conditions of which an      |
| 17 | interruptible would be called.                        |
| 18 | Q. Customers can leave the program under the          |
| 19 | same terms as they can today?                         |
| 20 | A. Correct.   |
| 21 | Q. And you don't propose to change the                |
| 22 | applicable penalty for not responding to an           |
| 23 | interruption call?                                    |
| 24 | A. We have not proposed that at this time.            |
| 25 | Q. Are the costs of the interruptible credit          |
|    |   |

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| 1  | borne by all of IPL's customer classes, not just the   |
|----|--|
| 2  | large general service class that's eligible to         |
| 3  | participate in this?                                   |
| 4  | A. That's correct. All customers benefit from          |
| 5  | the Demand Response Program, so all of the programs    |
| 6  | are socialized across all customer classes.            |
| 7  | Q. Would you accept, subject to check, that            |
| 8  | the residential class is responsible for about         |
| 9  | one-third of this cost?                                |
| 10 | A. Subject to check.                                   |
| 11 | Q. And I got that from the application;                |
| 12 | Exhibit 10, Tab A-1.                                   |
| 13 | A. Okay.   |
| 14 | Q. And the large general service and bulk              |
| 15 | class bears slightly less than 50 percent of the cost, |
| 16 | subject to check?                                      |
| 17 | A. Subject to check.                                   |
| 18 | Q. Given ongoing rate pressure concerns for            |
| 19 | your customers, are you concerned about the higher     |
| 20 | credit levels, which will serve only to add to the     |
| 21 | rate burdens of the approximately 175,000 of IPL's     |
| 22 | customers who are identified as low-income or          |
| 23 | moderate-income?                                       |
| 24 | A. No. I believe the benefits of the program           |
| 25 | even at the new credit levels still exceed the cost.   |
| 1  |  |

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So this will be a benefit to all customers despite the 1 2 increase in the credit level and the cost of the 3 program. 4 MS. EASLER: Okay. That's all I have. 5 I would move admission of OCA Hearing Exhibit 8. 6 7 (OCA Hearing Exhibit 8 was offered into evidence.) 8 9 PRESIDING OFFICER WRIGHT: Any objection to 10 the OCA Hearing Exhibit 8? 11 (No response.) 12 PRESIDING OFFICER WRIGHT: Hearing none, 13 it's admitted into the record. 14 (OCA Hearing Exhibit 8 was admitted into 15 the record.) 16 Ms. Van Loon. She just --17 MS. EASLER: I'm sorry. Did I get OCA 18 Hearing Exhibit 5 admitted already? 19 PRESIDING OFFICER WRIGHT: Yes. 20 MS. EASLER: Okay. I do have just two more hearing exhibits, and I'll distribute those together, 21 22 and we'll move through them quickly. They're marked 23 already. 24 One is OCA Hearing Exhibit 2, and the other 25 is OCA Hearing Exhibit 4.

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| 1  | (Brief pause.)                                |
|----|---|
| 2  | PRESIDING OFFICER WRIGHT: You may proceed.    |
| 3  | BY MS. EASLER:                                |
| 4  | Q. Ms. Gehrke, can you identify what's been   |
| 5  | marked as OCA Hearing Exhibit 2?              |
| 6  | A. OCA Data Request 12, and IPL's response.   |
| 7  | Q. Does this appear to be a true and accurate |
| 8  | copy of your response to this data request?   |
| 9  | A. Yes.                                       |
| 10 | MS. EASLER: I move admission of OCA           |
| 11 | Hearing Exhibit 2.                            |
| 12 | (OCA Hearing Exhibit 2 was offered into       |
| 13 | evidence.)                                    |
| 14 | PRESIDING OFFICER WRIGHT: Any objection?      |
| 15 | (No response.)                                |
| 16 | PRESIDING OFFICER WRIGHT: Hearing none, it    |
| 17 | is admitted into the record.                  |
| 18 | (OCA Hearing Exhibit 2 was admitted into      |
| 19 | evidence.)                                    |
| 20 | BY MS. EASLER:                                |
| 21 | Q. Can you identify OCA Hearing Exhibit 4?    |
| 22 | A. Yes. OCA Data Request 33 and IPL's         |
| 23 | response.                                     |
| 24 | Q. Does this appear to be a true and accurate |
| 25 | copy of your response to this data request?   |
|    |   |

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| 1  | A. Yes.  |
|----|--|
| 2  | Q. So in reviewing your response to Data               |
| 3  | Request No. 33, does this constitute the entirety of   |
| 4  | your evaluation for the data center pilot?             |
| 5  | A. I believe this data request is in reference         |
| 6  | to the transmission and distribution optimization and  |
| 7  | loss reduction pilot.                                  |
| 8  | Q. Okay.   |
| 9  | A. So no.  |
| 10 | Q. Does it constitute your EM&V for the                |
| 11 | optimization pilot?                                    |
| 12 | A. Yeah. This pilot was not subject to the             |
| 13 | third-party EM&V. It was done with internal IPL        |
| 14 | engineering resources, so, yes, it continues the full  |
| 15 | evaluation of the pilot project.                       |
| 16 | Q. Okay. So the details of your EM&V plan are          |
| 17 | not known for sure today; is that correct?             |
| 18 | A. Right. I think we provided the general              |
| 19 | structure in the plan, but once we select the          |
| 20 | third-party consultant, we'll develop the details that |
| 21 | will work.   |
| 22 | Q. At some point will you file that plan with          |
| 23 | the Board?   |
| 24 | A. Let me refer to the schedule. I don't               |
| 25 | believe we actually filed a plan with the Board, but   |

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| 1  | we do review the final plan with the parties.         |
|----|---|
| 2  | Then the Board I believe we're directed               |
| 3  | in the rules to provide the output of the EM&V, the   |
| 4  | report for that, that comes from it.                  |
| 5  | Q. Part of the concern with that approach is          |
| 6  | we don't know what the plan is today and can't really |
| 7  | work out those details with you. Would you agree that |
| 8  | that's the situation we're in?                        |
| 9  | A. I agree. That level of detail isn't                |
| 10 | currently available.                                  |
| 11 | Q. Would IPL be willing to file that plan when        |
| 12 | it is completed?                                      |
| 13 | A. If the Board requested us to do so, but as         |
| 14 | outlined in this plan, the parties have multiple      |
| 15 | opportunities for input. So, you know, we aren't      |
| 16 | doing it in isolation.                                |
| 17 | MS. EASLER: Fair enough. Thank you.                   |
| 18 | That's all I have.                                    |
| 19 | I would move admission of if I haven't                |
| 20 | already Hearing Exhibit 4.                            |
| 21 | (OCA Hearing Exhibit 4 was offered into               |
| 22 | evidence.)  |
| 23 | PRESIDING OFFICER WRIGHT: Any objection to            |
| 24 | the admission of OCA Hearing Exhibit 4?               |
| 25 | (No response.)  |
|    |   |

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| 1  | PRESIDING OFFICER WRIGHT: Hearing none, it          |
|----|---|
| 2  | is admitted into the record.                        |
| 3  | (OCA Hearing Exhibit 4 was admitted into            |
| 4  | evidence.)  |
| 5  | MS. EASLER: Thank you.                              |
| 6  | PRESIDING OFFICER WRIGHT: Now                       |
| 7  | Ms. Van Loon.                                       |
| 8  | CROSS-EXAMINATION                                   |
| 9  | BY MS. VAN LOON:                                    |
| 10 | Q. Ms. Gehrke, could you please direct your         |
| 11 | attention to page 3 of your reply testimony,        |
| 12 | specifically lines 3 through 5?                     |
| 13 | A. Okay. I'm there.                                 |
| 14 | Q. I believe in this section of your testimony      |
| 15 | you're describing discontinuing the seasonal peak   |
| 16 | discount; is that correct?                          |
| 17 | A. Yes.   |
| 18 | Q. How do interruptible customers currently         |
| 19 | see this discount on their bills?                   |
| 20 | A. Well, I would not say it is a discount on        |
| 21 | their bill, but if you would take a look at the     |
| 22 | exhibit that OCA offered on the current tariff, the |
| 23 | coincident peak, you see the credit calculation for |
| 24 | summer of 537 and winter at 346, that is a ratio of |
| 25 | what the full I think in the \$7 range, if you take |

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| 1  | the full calculation of 85 percent of CONE and 15      |
|----|--|
| 2  | percent of the market rate.                            |
| 3  | So I guess in my terms I translated that               |
| 4  | into a coincident peak discount in those seasons.      |
| 5  | Q. Is another way to express it that it                |
| 6  | reflects a reduction in the interruptible credit rate? |
| 7  | A. Yes.  |
| 8  | Q. Is it correct that the current                      |
| 9  | interruptible rate is applied to the difference        |
| 10 | between a customer's maximum monthly demand and their  |
| 11 | firm contract demand?                                  |
| 12 | A. Yes.  |
| 13 | Q. And is it also true that a customer's               |
| 14 | monthly maximum demand may not necessarily be the      |
| 15 | demand that they're operating at when an interruption  |
| 16 | is called?   |
| 17 | A. That's true.  |
| 18 | Q. Would you agree with me that as a member of         |
| 19 | the MISO market, IPL has to demonstrate its ability to |
| 20 | meet its demand plus a planning reserve margin at the  |
| 21 | time of MISO system peak?                              |
| 22 | A. I'm not a MISO expert, but that's my layman         |
| 23 | understanding.   |
| 24 | Q. Okay. Is there anyone else who is a                 |
| 25 | witness today for IPL who would be better suited to    |

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| 1  | answer that question, or would you be the best-suited  |
|----|--|
| 2  | among the four?  |
| 3  | A. Among the four, I would be the best-suited.         |
| 4  | Q. Okay. Same page of your reply testimony,            |
| 5  | but this time if you could direct your attention to    |
| 6  | lines 16 through 22, please.                           |
| 7  | PRESIDING OFFICER WRIGHT: Give us a second             |
| 8  | to get there. Is that it (indicating)?                 |
| 9  | MS. VAN LOON: Back to the reply testimony              |
| 10 | on page 3.   |
| 11 | BY MS. VAN LOON:                                       |
| 12 | Q. I believe in this portion of your testimony         |
| 13 | you reference allowing customers to set seasonal, firm |
| 14 | contractual demand levels in alignment with IPL's two  |
| 15 | general service tariff pricing seasons; is that        |
| 16 | correct?   |
| 17 | A. That's correct.                                     |
| 18 | Q. My understanding is that under MISO                 |
| 19 | seasonal construct, there are four seasons. Is that    |
| 20 | your understanding as well?                            |
| 21 | A. Yes.  |
| 22 | Q. And that under that construct, IPL has to           |
| 23 | have sufficient resources for each MISO season to      |
| 24 | cover the forecasted load; is that correct?            |
| 25 | A. Yes.  |
|    |  |

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| 1  | Q. Does IPL's high-load factor, large-volume           |
|----|--|
| 2  | tariff have seasonal prices?                           |
| 3  | A. I am not aware of the rates for that                |
| 4  | tariff.  |
| 5  | Q. Okay. So your answer isn't no; your answer          |
| 6  | is "I don't know"?                                     |
| 7  | A. I don't know.                                       |
| 8  | Q. Okay. Do you know of any reason why, such           |
| 9  | as a MISO or a NERC limitation, that would prohibit    |
| 10 | customers from having contract demands that align with |
| 11 | MISO's four seasons?                                   |
| 12 | A. I'm not aware of any.                               |
| 13 | Q. Okay. Would your billing system support             |
| 14 | such a construct?                                      |
| 15 | A. I think it would be possible, although it           |
| 16 | would be, obviously, more work to have four seasons    |
| 17 | rather than two, but I think it would support it, yes. |
| 18 | Q. And I understand your billing system has            |
| 19 | been, I'm going to say, overhauled. I don't know if    |
| 20 | that's what you would say about it.                    |
| 21 | A. We have a new billing system.                       |
| 22 | Q. Okay. And what do you think would be                |
| 23 | involved in creating that functionality, if you know?  |
| 24 | A. Well, they would have to reset that credit          |
| 25 | level for each season. It would be some amount of      |
| 1  |  |

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| 1  | input and testing to confirm that it was correct and   |
|----|--|
| 2  | that it flowed through on the customer bills properly. |
| 3  | Q. If you could now turn the page to number 4          |
| 4  | of your reply testimony, specifically lines 11 through |
| 5  | 14, I think you responded to a couple questions from   |
| 6  | Ms. Easler on this section of your testimony.          |
| 7  | So my understanding is you reference that              |
| 8  | IPL's revised proposal for the interruptible credits   |
| 9  | will increase the interruptible incentive budget to    |
| 10 | \$28 million annually. Is that the correct number?     |
| 11 | A. Yes.  |
| 12 | Q. I'm not quite sure where it is in front of          |
| 13 | you, but there should be LEG Exhibit 1, or it will     |
| 14 | come up on the screen. Just for your reference,        |
| 15 | that's a DR report, LEG DR No. 5.                      |
| 16 | I believe you were in the hearing room when            |
| 17 | I asked Mr. Velonis about this exhibit; is that right? |
| 18 | A. Yes, that's right.                                  |
| 19 | Q. And specifically I talked to Mr. Velonis            |
| 20 | about the fact that participant costs are assumed to   |
| 21 | be 75 percent of incentive costs.                      |
| 22 | Do you recall that?                                    |
| 23 | A. Yes.  |
| 24 | Q. Do you agree with Mr. Velonis's testimony           |
| 25 | on that item?  |
|    |  |

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| 1  | A. I defer to his expertise in the California          |
|----|--|
|    |  |
| 2  | Standard Practice Manual.                              |
| 3  | Q. So no disagreement?                                 |
| 4  | A. No.   |
| 5  | Q. If 75 percent of the proposed 28 million in         |
| 6  | interruptible incentives is considered participant     |
| 7  | cost, would that mean the total is approximately 21    |
| 8  | million, subject to check?                             |
| 9  | A. Yeah. Aside from the math, I think you can          |
| 10 | break out the incentive cost into different parts for  |
| 11 | purposes of the benefit/cost calculation.              |
| 12 | So I don't think I would say that lowers               |
| 13 | the incentive cost to 21 million or whatever number    |
| 14 | you provided, but I am not an expert at                |
| 15 | cost-effectiveness tests.                              |
| 16 | Q. Based upon your experience and knowledge of         |
| 17 | the Demand Response and Energy Efficiency Program, do  |
| 18 | customers participate in these programs if their cost  |
| 19 | to participate exceeds the value they receive from the |
| 20 | programs?  |
| 21 | A. I would expect no.                                  |
| 22 | MS. VAN LOON: No further questions, Your               |
| 23 | Honor.   |
| 24 | PRESIDING OFFICER WRIGHT: Ms. Herndon.                 |
| 25 |  |
|    |  |

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| 1  | CROSS-EXAMINATION                                   |
|----|---|
| 2  | BY MS. HERNDON:                                     |
| 3  | Q. Good morning, Ms. Gehrke.                        |
| 4  | A. Good morning.                                    |
| 5  | Q. I just have one question. In the 2018            |
| 6  | proceeding, in your reply testimony you had stated  |
| 7  | that IPL uses the full nameplate capacity of the    |
| 8  | aggregate demand response resources in long-term    |
| 9  | resource planning.                                  |
| 10 | I might have missed it, but I didn't see it         |
| 11 | in your testimony this year. Is that the case for   |
| 12 | this application this year as well?                 |
| 13 | A. Yes, we're still following that practice.        |
| 14 | MS. HERNDON: That's all I have. Thank               |
| 15 | you.  |
| 16 | PRESIDING OFFICER WRIGHT: Thank you.                |
| 17 | MR. MARTIN-SCHRAMM: Your Honor?                     |
| 18 | PRESIDING OFFICER WRIGHT: Do you have a             |
| 19 | specific question you would like to address to this |
| 20 | witness?  |
| 21 | MR. MARTIN-SCHRAMM: Yes, if that's all              |
| 22 | right.  |
| 23 | PRESIDING OFFICER WRIGHT: You need to tell          |
| 24 | me what that is.                                    |
| 25 | MR. MARTIN-SCHRAMM: Earlier in                      |
| 1  |   |

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| 1  | Ms. Gehrke's testimony in response to Mr. Sowden she  |
|----|---|
| 2  | clarified the 76 customers was per year, and that was |
| 3  | in reference to a data request the Clean Energy       |
| 4  | Districts of Iowa filed with IPL, which Ms. Gehrke    |
| 5  | responded to.   |
| 6  | Ms. Gehrke clarified 76 per year and not              |
| 7  | over the whole five-year life of the plan. My         |
| 8  | question to her would be: Does that apply to the      |
| 9  | other two lines in that? So there's 760 for           |
| 10 | low-income customers and 76 for the multi-family and  |
| 11 | the institutional low-income?                         |
| 12 | PRESIDING OFFICER WRIGHT: Do you have a               |
| 13 | reference for that?                                   |
| 14 | MR. MARTIN-SCHRAMM: It's CEDI data                    |
| 15 | request   |
| 16 | PRESIDING OFFICER WRIGHT: Is it an exhibit            |
| 17 | in your testimony?                                    |
| 18 | MR. MARTIN-SCHRAMM: Yes, it is an exhibit             |
| 19 | in my testimony. It's Martin-Schramm Direct. It's     |
| 20 | IPL to CEDI, Data Request 10.                         |
| 21 | PRESIDING OFFICER WRIGHT: What's the                  |
| 22 | exhibit number?                                       |
| 23 | MR. MARTIN-SCHRAMM: It's probably number              |
| 24 | 1. I apologize. Yes, it's CEDI Exhibit No. 1, IPL     |
| 25 | Response to Data Request 5 [sic].                     |

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| 1  | PRESIDING OFFICER WRIGHT: Okay. Let us                |
|----|---|
| 2  | find that.  |
| 3  | So if you look at the screen, is that what            |
| 4  | you're referencing?                                   |
| 5  | MR. MARTIN-SCHRAMM: Just one moment. I                |
| 6  | apologize. It might be easier to look at it on paper. |
| 7  | PRESIDING OFFICER WRIGHT: I think we want             |
| 8  | to look at the response.                              |
| 9  | MR. MARTIN-SCHRAMM: It's CEDI Data Request            |
| 10 | 10, and Ms. Gehrke's response is on the I think the   |
| 11 | third page of the three-page document. There it is.   |
| 12 | So she clarified on the second bullet that            |
| 13 | it's 76 times 5, so 76 per year. I just want to find  |
| 14 | out if that's the case for the first bullet and the   |
| 15 | third bullet, 760 times 5.                            |
| 16 | PRESIDING OFFICER WRIGHT: Okay. Do you                |
| 17 | understand the question?                              |
| 18 | THE WITNESS: I do.                                    |
| 19 | PRESIDING OFFICER WRIGHT: Do you have a               |
| 20 | response?   |
| 21 | THE WITNESS: That's correct. It's annual.             |
| 22 | MR. MARTIN-SCHRAMM: Can I ask one more                |
| 23 | question?   |
| 24 | PRESIDING OFFICER WRIGHT: What is it?                 |
| 25 | MR. MARTIN-SCHRAMM: The request for the               |
|    |   |

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| 1  | first bullet there, single-family low-income. These    |
|----|--|
| 2  | are all households that would be served through IPL's  |
| 3  | participation with the State Weatherization Assistance |
| 4  | Program?   |
| 5  | PRESIDING OFFICER WRIGHT: Say that again.              |
| 6  | MR. MARTIN-SCHRAMM: So the first bullet in             |
| 7  | the single-family low-income, the 760 per year, this   |
| 8  | is the estimated number of households that IPL will    |
| 9  | serve per year through their participation in the      |
| 10 | State of Iowa's Weatherization Assistance Program?     |
| 11 | PRESIDING OFFICER WRIGHT: Do you                       |
| 12 | understand that question?                              |
| 13 | THE WITNESS: Yes.                                      |
| 14 | PRESIDING OFFICER WRIGHT: Do you have a                |
| 15 | response?  |
| 16 | THE WITNESS: Yes.                                      |
| 17 | PRESIDING OFFICER WRIGHT: You may respond.             |
| 18 | THE WITNESS: Yes, it accounts for the IPL              |
| 19 | federal bundling for the Federal Weatherization        |
| 20 | Assistance Program.                                    |
| 21 | MS. VAN LOON: Your Honor, apologies. I                 |
| 22 | should have noted this earlier.                        |
| 23 | I have a couple questions for Ms. Gehrke               |
| 24 | that are confidential that would need to be taken up   |
| 25 | in confidential sessions because they involve an       |
|    |  |

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| 1  | exhibit marked as confidential.                        |
|----|--|
| 2  | PRESIDING OFFICER WRIGHT: Okay. I'm                    |
| 3  | looking at my notes. It will be just a minute.         |
| 4  | (Brief pause.)   |
| 5  | PRESIDING OFFICER WRIGHT: Okay. You were               |
| 6  | here and heard my questions about doing a cost/benefit |
| 7  | analysis, updating it depending on some of the         |
| 8  | proposed modifications to the EEP plan that is being   |
| 9  | proposed by IPL.                                       |
| 10 | THE WITNESS: Yes.                                      |
| 11 | PRESIDING OFFICER WRIGHT: Can IPL                      |
| 12 | employees do any of that updating or cost/benefit      |
| 13 | analysis?  |
| 14 | THE WITNESS: We, generally speaking, do                |
| 15 | not perform cost/benefit analysis on proposals from    |
| 16 | the parties unless the Board would direct us to do so, |
| 17 | if the Board would choose one of the parties'          |
| 18 | proposals over what we had put forward in the plan.    |
| 19 | Generally speaking, the parties don't                  |
| 20 | always provide enough information to provide a full    |
| 21 | cost/benefit analysis. We would need to know, you      |
| 22 | know, both the cost and the participation levels and   |
| 23 | some other assumptions, so we don't generally perform  |
| 24 | that work for proposals.                               |
| 25 | PRESIDING OFFICER WRIGHT: If that                      |
|    |  |

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| 1  | information was provided, then would you have done     |
|----|--|
| 2  | that cost/benefit analysis?                            |
| 3  | THE WITNESS: It would be possible to do                |
| 4  | so, if we were considering adopting that proposal.     |
| 5  | Then we could do so certainly.                         |
| 6  | PRESIDING OFFICER WRIGHT: So if a party                |
| 7  | was to do that analysis and provide in their testimony |
| 8  | what their cost/benefit analysis did, would IPL review |
| 9  | that and determine, assess whether they thought that   |
| 10 | was reasonable or whether that was the correct result? |
| 11 | THE WITNESS: Yes. If the parties provided              |
| 12 | it, we would review.                                   |
| 13 | PRESIDING OFFICER WRIGHT: So to follow up              |
| 14 | on that, so you did not do a cost/benefit analysis on  |
| 15 | the OCA recommendation that IPL offer free smart       |
| 16 | thermostats coupled with enrollment in the Demand      |
| 17 | Response Program?                                      |
| 18 | THE WITNESS: We did not do a separate                  |
| 19 | cost/benefit analysis of that. We provided our         |
| 20 | feedback on our previous analysis.                     |
| 21 | PRESIDING OFFICER WRIGHT: And was there a              |
| 22 | specific reason that you changed your methodology for  |
| 23 | the credit, the nonresidential credit from the 85      |
| 24 | percent/15 percent weighted to just the MISO?          |
| 25 | THE WITNESS: It was primarily due to the               |

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| 1  | volatility of the PRA in recent years. If I can be     |
|----|--|
| 2  | allowed to give round numbers, it closed at \$25 two   |
| 3  | years ago, \$250 a year ago, ranging, you know, \$10.  |
| 4  | This year over the four seasons, \$2 in the winter.    |
| 5  | So it has had a certain amount of                      |
| 6  | volatility, and I think also that's difficult for both |
| 7  | IPL and for the customers to react to, if on an annual |
| 8  | basis it may whiff up and down and change the credit   |
| 9  | level.   |
| 10 | For the time being we felt it was                      |
| 11 | appropriate to discontinue the use of the PRA. Even    |
| 12 | MISO has perhaps suggested that it hasn't settled into |
| 13 | a regular level; that it may continue to have          |
| 14 | volatility. That was our primary reason.               |
| 15 | PRESIDING OFFICER WRIGHT: And then why are             |
| 16 | you changing the proposal to make it a five-year       |
| 17 | contract rather than a three-year contract?            |
| 18 | THE WITNESS: We're proposing the change                |
| 19 | really due to the administrative level of burden it    |
| 20 | was to get the customers to re-sign the contracts at   |
| 21 | the three-year level.                                  |
| 22 | It seemed it didn't serve a lot of purpose             |
| 23 | to have one at mid-plan, at the three-year, so we just |
| 24 | proposed to make it align with the Energy Efficiency   |
| 25 | Plan. We added the band of 20 percent, plus or minus.  |
|    |  |

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| 1  | If the CONE price would change in any given            |
|----|--|
| 2  | year, then we would make that adjustment. So we felt   |
| 3  | that was a fair compromise to customers with a         |
| 4  | longer-term contract but with a band for adjustments   |
| 5  | early up or down.                                      |
| 6  | PRESIDING OFFICER WRIGHT: So is that your              |
| 7  | primary reason, then, for having the plus and minus 25 |
| 8  | percent?   |
| 9  | THE WITNESS: Yeah. I mean, our main                    |
| 10 | concern is to be able to properly compensate the       |
| 11 | customers who are providing the capacity at whatever   |
| 12 | the market value for the capacity is while on behalf   |
| 13 | of all other customers not overpaying.                 |
| 14 | So we want to put in that correction band              |
| 15 | in case the CONE price did make a correction. It       |
| 16 | happens to be higher right now than it has been in the |
| 17 | past, so we still feel it's correct to anchor to it.   |
| 18 | But if it goes down on behalf of all                   |
| 19 | customers, we would want to lower the credit level     |
| 20 | correspondingly.                                       |
| 21 | PRESIDING OFFICER WRIGHT: If that changes,             |
| 22 | does that have an effect on your budget? How does it   |
| 23 | fit into the plan?                                     |
| 24 | THE WITNESS: It would have an effect on                |
| 25 | the actual spend for sure, and then we would make a    |

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| determination if it was extensive enough that it would |
|--|
| require a modification to the plan to update the       |
| budget.  |
| I would guess a 25 percent swing up or down            |
| would likely trigger us to do a modification to update |
| the budget.  |
| PRESIDING OFFICER WRIGHT: So does IPL                  |
| oppose OCA's recommendation that IPL file its EM&V     |
| tracking spreadsheet with its energy efficiency annual |
| report?  |
| THE WITNESS: I think all the information               |
| in the tracking sheet, as far as the recommendations,  |
| are included in the reports from the vendor. To the    |
| extent the Board would request to see each of our      |
| responses to those line items, we would make it        |
| available, but we don't feel that a mandatory          |
| requirement would be necessary.                        |
| PRESIDING OFFICER WRIGHT: So you think all             |
| that information is in the annual report? Is that      |
| what you're saying?                                    |
| THE WITNESS: All the recommendations would             |
| be in the annual report, not necessarily IPL's         |
| implementation of those. If the Board asked us for     |
| that information or the parties for that matter, we're |
| happy to provide it.                                   |
|  |

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| 1  | PRESIDING OFFICER WRIGHT: So I know                    |
|----|--|
| 2  | there's some testimony about the use of the AMI data.  |
| 3  | Has IPL considered using the AMI data as part of their |
| 4  | Energy Efficiency Program or plan? How does that       |
| 5  | relate?  |
| 6  | THE WITNESS: Yeah. It gets used in many                |
| 7  | ways, actually.  |
| 8  | If you look at the Home Energy Reports                 |
| 9  | Program we were discussing earlier, we use the AMI     |
| 10 | data to do a billing analysis between the treatment    |
| 11 | groups, those who get the letter; and the control      |
| 12 | groups, those who don't, to say what behavior changed? |
| 13 | How has that impacted any savings that those treatment |
| 14 | group customers are seeing? It's, of course, used in   |
| 15 | the Demand Response Programs to calculate what         |
| 16 | customers' participation is.                           |
| 17 | Gosh. I don't know if I can list all of                |
| 18 | them, but it's actually incorporated in numerous ways. |
| 19 | PRESIDING OFFICER WRIGHT: And there was                |
| 20 | also some testimony about a rate calculator.           |
| 21 | So if I have the testimony correctly, IPL              |
| 22 | has not completed its work on the rate calculator, and |
| 23 | where are you in that process? Is there a time line    |
| 24 | for completing it?                                     |
| 25 | THE WITNESS: I think in the prior plan it              |

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| 1  | was envisioned that one of the energy efficiency       |
|----|--|
| 2  | vendors would develop that rate calculator. As it      |
| 3  | turns out, Alliant Energy decided to develop that      |
| 4  | internally with our own IT resources.                  |
| 5  | We've been reporting on that through the               |
| 6  | stakeholder collaboration process in RPU-2019-0001.    |
| 7  | It is active as of, I believe, beginning of May.       |
| 8  | So the rate calculator is now available for            |
| 9  | customers' use. It doesn't happen to be connected      |
| 10 | directly to any of the energy efficiency programs, but |
| 11 | it is available.                                       |
| 12 | PRESIDING OFFICER WRIGHT: When you say                 |
| 13 | it's "available," does that mean it's on the website?  |
| 14 | THE WITNESS: It's on the website. Thank                |
| 15 | you.   |
| 16 | PRESIDING OFFICER WRIGHT: Okay. I think                |
| 17 | that's all the questions I have.                       |
| 18 | Mr. Sowden, I'm going to go back around and            |
| 19 | see if anyone has any additional questions based on my |
| 20 | questions, and then we'll come back to your redirect.  |
| 21 | MR. SOWDEN: That works. Thank you, Your                |
| 22 | Honor.   |
| 23 | PRESIDING OFFICER WRIGHT: Ms. Easler.                  |
| 24 |  |
| 25 |  |
|    |  |

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| 1  | RECROSS-EXAMINATION                                  |
|----|--|
| 2  | By MS. EASLER:                                       |
| 3  | Q. I just had one follow-up on your reason for       |
| 4  | eliminating the short-term capacity value from your  |
| 5  | interruptible credit, and you cited volatility.      |
| 6  | So apart from last year, the short-term              |
| 7  | market price has been fairly consistent, has it not? |
| 8  | A. It has been.                                      |
| 9  | Q. And by giving it 15 percent weight, are you       |
| 10 | somewhat mitigating against volatility?              |
| 11 | A. Somewhat.   |
| 12 | MS. EASLER: Thank you. That's all.                   |
| 13 | PRESIDING OFFICER WRIGHT: Ms. Van Loon.              |
| 14 | MS. VAN LOON: Nothing further, Your Honor.           |
| 15 | PRESIDING OFFICER WRIGHT: Ms. Herndon?               |
| 16 | MS. HERNDON: I have no more questions.               |
| 17 | PRESIDING OFFICER WRIGHT: Mr. Mandelbaum?            |
| 18 | MR. MANDELBAUM: No questions.                        |
| 19 | PRESIDING OFFICER WRIGHT: Mr. Sowden,                |
| 20 | redirect?  |
| 21 | REDIRECT EXAMINATION                                 |
| 22 | BY MR. SOWDEN:                                       |
| 23 | Q. I just have one question, and I would like        |
| 24 | to turn to OCA Hearing Exhibit 9. It was actually    |
| 25 | introduced while Ms. Ellsworth was on the stand.     |

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| 1  | I apologize. I see we're putting it on the             |
|----|--|
| 2  | screen.  |
| 3  | Were you in the room when this was                     |
| 4  | introduced?  |
| 5  | A. Yes.  |
| 6  | Q. Do you remember the conversation, the               |
| 7  | questions that OCA was asking Ms. Ellsworth?           |
| 8  | A. Yes.  |
| 9  | Q. And that they were generally related to the         |
| 10 | limited-income program?                                |
| 11 | A. Yes.  |
| 12 | Q. Since March 31st of 2016, has there been a          |
| 13 | more recent EM&V report that addressed limited-income  |
| 14 | programs?  |
| 15 | A. Yes. In the current EM&V from Opinion               |
| 16 | Dynamics, there's been an additional EM&V on           |
| 17 | income-qualified programs.                             |
| 18 | Q. And did it come to a different conclusion?          |
| 19 | A. Yes. They actually made a recommendation            |
| 20 | that IPL bring back the limited-income program based   |
| 21 | on a recommendation from the community action agencies |
| 22 | that they saw it as an opportunity to fill that out.   |
| 23 | MR. SOWDEN: Thank you. No further                      |
| 24 | questions.   |
| 25 | PRESIDING OFFICER WRIGHT: Of course, based             |
| 25 | PRESIDING OFFICER WRIGHT: Of course, based             |

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| 1  | on your redirect, I have another question.             |
|----|--|
|    |  |
| 2  | So I read the testimony about the                      |
| 3  | low-income program and your relationship with IPL to   |
| 4  | the CAP agencies and that. So is your program for      |
| 5  | low-income customers based entirely on that            |
| 6  | relationship and your collaboration with them? You     |
| 7  | don't have a separate low-income program, Energy       |
| 8  | Efficiency Program for low-income customers?           |
| 9  | THE WITNESS: So we're proposing to break               |
| 10 | it into three. We've had it in two sections. One is    |
| 11 | the Weatherization Assistance, the single-family       |
| 12 | low-income, which I would describe as braided funding  |
| 13 | with the Federal Weatherization Assistance Programs.   |
| 14 | So we provide additional funding to the CAP agencies   |
| 15 | for the homes treated in the IPL service territory.    |
| 16 | So that's one aspect.                                  |
| 17 | We have also previously had the                        |
| 18 | multi-family low-income, and that is not in            |
| 19 | conjunction with the CAP agencies. We run that         |
| 20 | separately.  |
| 21 | And then we're proposing this for further              |
| 22 | limited-income that we would also not run with the CAP |
| 23 | agencies. We'd be seeking a third-party implementer    |
| 24 | to run that program.                                   |
| 25 | PRESIDING OFFICER WRIGHT: So if I'm                    |

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| 1  | understanding the testimony, there's a backlog, but    |
|----|--|
| 2  | there are low-income customers who have not received   |
| 3  | the benefit of the program.                            |
| 4  | Which of these addresses that, and if not,             |
| 5  | are you proposing to address that backlog?             |
| 6  | THE WITNESS: Well, the backlog doesn't                 |
| 7  | specifically address it for those who qualify for the  |
| 8  | WAP program, the poverty level that addresses the gap. |
| 9  | Just to put another number on that, federal            |
| 10 | poverty level at 200 percent is 6,000 for a            |
| 11 | four-person home, so still people with significant     |
| 12 | need for assistance with weatherization.               |
| 13 | The activity we're proposing to help                   |
| 14 | address that gap, one of the needs that the agencies   |
| 15 | have identified is getting more contractors qualified  |
| 16 | to perform the work because they're subject to the     |
| 17 | federal guidelines. They have to have training on      |
| 18 | lead abatement and some other activities that may not  |
| 19 | necessarily be just installation of energy efficiency  |
| 20 | equipment.   |
| 21 | So we have proposed ourselves and                      |
| 22 | MidAmerican, Black Hills to help provide assistance to |
| 23 | get more contractors in the state of Iowa trained and  |
| 24 | available to do that work to help address to help      |
| 25 | close that gap.  |
|    |  |

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| 1  | It won't completely close it. The need is              |
|----|--|
| 2  | high. The dollars are limited.                         |
| 3  | PRESIDING OFFICER WRIGHT: So are there                 |
| 4  | specific aspects of that program? It seems to me       |
| 5  | there's some question about exactly what's being done  |
| 6  | for training.  |
| 7  | THE WITNESS: As I mentioned, we're working             |
| 8  | with the Iowa Department of Human Rights to help with  |
| 9  | those trainings that they would like to help us fund   |
| 10 | and promote.   |
| 11 | I would just call that a work in progress.             |
| 12 | It's currently happening, but we have not yet          |
| 13 | identified what those trainings might be concretely.   |
| 14 | PRESIDING OFFICER WRIGHT: So are there                 |
| 15 | funds in this plan's budget for that training?         |
| 16 | THE WITNESS: Yeah. We would intend to use              |
| 17 | the funding part of the funding currently allotted     |
| 18 | for the single-family low-income program to provide    |
| 19 | that training. We didn't provide a separate line       |
| 20 | item, but we would intend to use some of that budget   |
| 21 | for that activity.                                     |
| 22 | PRESIDING OFFICER WRIGHT: So will that                 |
| 23 | affect the number of low-income customers who can take |
| 24 | advantage of the program?                              |
| 25 | THE WITNESS: Well, again, in recent                    |
|    |  |

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| 1  | history the CAP agencies haven't been spending the     |
|----|--|
| 2  | full allotment from IPL. I don't believe it will       |
| 3  | short term negatively impact the customers they're     |
| 4  | serving year-by-year, and they anticipated, of course, |
| 5  | that it will near term increase the number of          |
| 6  | customers served because if they have more contractors |
| 7  | available to do the work, they can serve more homes.   |
| 8  | PRESIDING OFFICER WRIGHT: So what's the                |
| 9  | primary reason or do you know why the CAP agencies     |
| 10 | haven't been fully utilizing IPL funds?                |
| 11 | THE WITNESS: I don't know if I can fully               |
| 12 | speak for them, but I'll give you some general ideas.  |
| 13 | One of them is matching dollars. So when               |
| 14 | they run out of federal funding, even though they      |
| 15 | might have some utility funding left, they wouldn't    |
| 16 | they stop doing homes. Of course, they had some        |
| 17 | impact with COVID-19 in recent years and were able to  |
| 18 | complete a lot of that work.                           |
| 19 | They were not going into customer homes to             |
| 20 | perform any of that work. Folks didn't want them in    |
| 21 | their homes, so that has been in recent times coming   |
| 22 | back but still not quite to pre-COVID levels.          |
| 23 | And then the training aspect. Each CAP                 |
| 24 | agency in their current practice is to hire            |
| 25 | contractors to perform the work, so they are not,      |
|    |  |

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| 1  | generally speaking, CAP agency employees, but they're |
|----|---|
| 2  | contracted to do the work. They just are not finding  |
| 3  | enough contractors who will have the federal          |
| 4  | certifications required and are available to do the   |
| 5  | work.   |
| 6  | PRESIDING OFFICER WRIGHT: Thank you.                  |
| 7  | That's all I have.                                    |
| 8  | Any redirect on that?                                 |
| 9  | MR. SOWDEN: No, Your Honor.                           |
| 10 | PRESIDING OFFICER WRIGHT: Thank you. You              |
| 11 | may step down.  |
| 12 | THE WITNESS: Thank you.                               |
| 13 | PRESIDING OFFICER WRIGHT: I think rather              |
| 14 | than go to another witness, it may be time to just    |
| 15 | take our lunch break. We'll be back at 1:15. We're    |
| 16 | off the record.                                       |
| 17 | (A lunch recess was taken at 12:15 p.m.               |
| 18 | until 1:19 p.m.)                                      |
| 19 | PRESIDING OFFICER WRIGHT: We're back on               |
| 20 | the record. I think IPL has another witness, correct? |
| 21 | MR. SOWDEN: That is correct. Before                   |
| 22 | turning to that, I would like to ask the presiding    |
| 23 | officer's permission I have two witnesses that are    |
| 24 | from out of town Ms. Ellsworth and Mr. Velonis        |
| 25 | and they have the ability to catch an earlier flight  |
| 25 | and they have the ability to catch an earlier flight  |
|    |   |

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| 1  | this afternoon.                                      |
|----|--|
| 2  | After our witness, if there's no objection           |
| 3  | and no need to re-call Ms. Ellsworth or Mr. Velonis, |
| 4  | could we dismiss them at 3:30?                       |
| 5  | PRESIDING OFFICER WRIGHT: So I think the             |
| 6  | question is and I forgot who had confidential        |
| 7  | questions. You need either of those witnesses for    |
| 8  | your confidential questions?                         |
| 9  | MS. VAN LOON: I do not. My confidential              |
| 10 | questions are for Witness Gehrke.                    |
| 11 | PRESIDING OFFICER WRIGHT: Anyone else have           |
| 12 | any reason to re-call either Ms. Ellsworth or        |
| 13 | Mr. Velonis?   |
| 14 | (No response.)                                       |
| 15 | PRESIDING OFFICER WRIGHT: Okay. Without              |
| 16 | objection, then, they may be excused.                |
| 17 | MR. SOWDEN: Thank you, Your Honor. IPL               |
| 18 | would like to call Adrianna Iano.                    |
| 19 | ADRIANNA L. IANO,                                    |
| 20 | called as a witness by Interstate Power and Light    |
| 21 | Company, being first duly sworn by Presiding Officer |
| 22 | Wright, was examined and testified as follows:       |
| 23 | PRESIDING OFFICER WRIGHT: Have a seat.               |
| 24 | You may proceed.                                     |
| 25 | MR. SOWDEN: Thank you.                               |
|    |  |

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Page 122 1 DIRECT EXAMINATION 2 BY MR. SOWDEN: 3 Good afternoon. Q. 4 Α. Hello. 5 0. Could you please state your name and employer for the record? 6 Adrianna L. Iano, Interstate Power and 7 Α. Light Company. 8 9 And what is your position with Interstate 0. Power and Light Company? 10 11 I'm senior regulatory policy and regulation Α. 12 consultant. 13 Are you the same Adrianna Iano who filed or 0. 14 caused to be filed direct and reply testimony in this 15 proceeding? 16 Α. I am. 17 Do you have any corrections or changes to 0. 18 your prefiled testimony? 19 Α. I do not. 20 If I were to ask you all of the questions Q. in your testimony today under oath, would you give the 21 22 same answers? 23 I would. Α. 24 MR. SOWDEN: Your Honor, with the 25 understanding that Ms. Iano's prefiled testimony has

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| r  |   |
|----|---|
| 1  | been entered into the record, Interstate Power and    |
| 2  | Light Company tenders Ms. Iano for questions from the |
| 3  | parties and the presiding officer.                    |
| 4  | PRESIDING OFFICER WRIGHT: Ms. Johnson?                |
| 5  | MS. JOHNSON: Yes.                                     |
| 6  | CROSS-EXAMINATION                                     |
| 7  | BY MS. JOHNSON:                                       |
| 8  | Q. Good afternoon. So you're responsible for          |
| 9  | the cost analysis that accompanied IPL's Energy       |
| 10 | Efficiency Plan; correct?                             |
| 11 | A. Correct.   |
| 12 | Q. Are you also responsible for the additional        |
| 13 | resource planning information that was filed after    |
| 14 | your plan filing in response to Board staff's request |
| 15 | for additional information that was submitted on      |
| 16 | November 14th of 2022, and your response was filed    |
| 17 | December 2nd of 2022?                                 |
| 18 | A. I am Excuse me. I am unsure. I                     |
| 19 | believe, yes, but I would need to see that, too.      |
| 20 | Q. Would you like to see the                          |
| 21 | PRESIDING OFFICER WRIGHT: Do we need to               |
| 22 | bring that up?  |
| 23 | MS. JOHNSON: It's the Board's request                 |
| 24 | for additional information that was filed on          |
| 25 | November 14th.  |
|    |   |

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| 1  | PRESIDING OFFICER WRIGHT: Can you find              |
|----|---|
| 2  | that and bring that up? Maybe that will help the    |
| 3  | witness.  |
| 4  | BY MS. JOHNSON:                                     |
| 5  | Q. So I'm specifically looking at the answers       |
| 6  | to the questions of Requests 4 through 8. Would you |
| 7  | have provided responses for those?                  |
| 8  | If you need to see IPL's responses, I'm             |
| 9  | sure we can find those as well.                     |
| 10 | A. Yes, if you would. They do look familiar.        |
| 11 | PRESIDING OFFICER WRIGHT: Can you find the          |
| 12 | responses, please?                                  |
| 13 | MR. SOWDEN: Some of the responses are               |
| 14 | confidential.                                       |
| 15 | PRESIDING OFFICER WRIGHT: Do you have them          |
| 16 | split between confidential and I believe we do have |
| 17 | that, so we'll want to see the public version.      |
| 18 | MR. SOWDEN: I guess it would be the                 |
| 19 | attachments that are confidential, not the actual   |
| 20 | responses, just to clarify.                         |
| 21 | MS. JOHNSON: Again, I'm looking                     |
| 22 | specifically at Request Nos. and Response Nos. 4    |
| 23 | through 8.  |
| 24 | A. Yes, those do look familiar. Yes.                |
| 25 | BY MS. JOHNSON:                                     |

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| Q. Do you consider the information that was            |
|--|
| requested by the Board to complete IPL's minimum       |
| filing requirements, specifically those Request Nos.   |
| 4 through 8, to be an essential part of IPL's plan     |
| filing that should have accompanied the initial plan   |
| when it was filed on November 1st?                     |
| A. I'm not sure.                                       |
| Q. I'm going to direct your attention to your          |
| direct testimony, page 8, lines 9 through 16.          |
| IPL's avoided electric energy cost                     |
| determination is a product of an Aurora modeling       |
| analysis; is that correct?                             |
| A. Correct.  |
| Q. So turning to page 10 of your direct                |
| testimony, lines 21 through 23 and continuing onto     |
| page 11, lines 3 through 6, where you discuss updating |
| inputs in the modeling analysis, do you typically run  |
| an updated Aurora modeling analysis to update IPL's    |
| biannual avoided cost filing?                          |
| A. I'm unsure. Our resource planning division          |
| does a lot of that work for us, the avoidance cost     |
| filings, so I'm unsure.                                |
| MS. JOHNSON: I have no additional                      |
| questions. Thanks.                                     |
| PRESIDING OFFICER WRIGHT: Ms. Van Loon.                |
|  |

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| 1  | MS. VAN LOON: Thank you, Your Honor.                  |
|----|---|
| 2  | CROSS-EXAMINATION                                     |
| 3  | BY MS. VAN LOON:                                      |
| 4  | Q. Could we please turn to your reply                 |
| 5  | testimony, Exhibit 1, and in particular the           |
| 6  | transmission carrying charge sheet?                   |
| 7  | My understanding is that you prepared this            |
| 8  | computation; is that correct?                         |
| 9  | A. Correct.   |
| 10 | Q. And that this computation is based upon ITC        |
| 11 | Midwest's Attachment O filing; is that correct?       |
| 12 | A. Correct.   |
| 13 | Q. Can I assume that you're familiar with the         |
| 14 | Attachment O filing?                                  |
| 15 | A. Correct.   |
| 16 | Q. In ITC Midwest's Attachment O, would you           |
| 17 | agree, subject to check, that their return on equity  |
| 18 | is 10.77 percent?                                     |
| 19 | A. Subject to check.                                  |
| 20 | Q. And would you agree that in IPL's docket           |
| 21 | RPU-2019-1 that was the appeals last rate case        |
| 22 | that the return on equity was 9.5 percent?            |
| 23 | A. Subject to check.                                  |
| 24 | Q. Therefore, does ITC Midwest's Attachment O         |
| 25 | provide a 127-basis point return on equity premium in |
|    |   |

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| 1  | your calculation of avoided transmission costs?        |
|----|--|
| 2  | A. Subject to check.                                   |
| 3  | Q. So  |
| 4  | PRESIDING OFFICER WRIGHT: Can I just                   |
| 5  | interject here? I don't know exactly what "subject to  |
| 6  | check," means. People use it every once in a while,    |
| 7  | but to use it every time doesn't provide me the kind   |
| 8  | of definite information I need. Either you know or     |
| 9  | don't know.  |
| 10 | If it's not correct what she's saying, how             |
| 11 | are we going to check? Mr. Sowden, do you have an      |
| 12 | answer for that?                                       |
| 13 | MR. SOWDEN: I think without checking ITC's             |
| 14 | Attachment O or having it in front of us, because of   |
| 15 | the calculation that counsel just made, we wouldn't be |
| 16 | able to do it unless we check the original number.     |
| 17 | PRESIDING OFFICER WRIGHT: So is a proper               |
| 18 | response "I don't know"?                               |
| 19 | MR. SOWDEN: Yes.                                       |
| 20 | PRESIDING OFFICER WRIGHT: I just don't                 |
| 21 | understand what happens with "subject to check."       |
| 22 | MS. VAN LOON: This is a pretty common                  |
| 23 | undertaking mechanism that allows the party to check   |
| 24 | the math after the fact because doing so live is       |
| 25 | pretty cumbersome, and in general, when people are     |
|    |  |

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| 1  | asking a question subject to check, they do know the  |
|----|---|
| 2  | answer. It just speeds the record along rather than   |
| 3  | belaboring things.                                    |
| 4  | So I'm not trying to be tricky here or do a           |
| 5  | gotcha, but aside from, like, whiteboarding it and    |
| 6  | doing math, this is a pretty efficient way to get     |
| 7  | testimony.  |
| 8  | PRESIDING OFFICER WRIGHT: It's not you                |
| 9  | that I was questioning.                               |
| 10 | MS. VAN LOON: Okay.                                   |
| 11 | PRESIDING OFFICER WRIGHT: I just think                |
| 12 | responses over and over again that are "Subject to    |
| 13 | check" really doesn't provide me the information.     |
| 14 | If you want to say, you know There's a                |
| 15 | better response. "Subject to check" doesn't give me   |
| 16 | the input I need. I don't know what your response is. |
| 17 | If you don't know, say you don't know, and            |
| 18 | we'll move on. That's up to you, but putting          |
| 19 | everything subject to check doesn't help me.          |
| 20 | A. I would say that it sounds reasonable, but         |
| 21 | I would need to do the math.                          |
| 22 | PRESIDING OFFICER WRIGHT: Okay. There we              |
| 23 | go.   |
| 24 | BY MS. VAN LOON:                                      |
| 25 | Q. Do you know whether the Iowa Utilities             |
|    |   |

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| 1  | Board has authority over federally regulated       |
|----|--|
| 2  | transmission lines?                                |
| 3  | A. It does not.                                    |
| 4  | Q. Do you know if Iowa has an integrated           |
| 5  | planning filing requirement that addresses local   |
| 6  | transmission needs?                                |
| 7  | A. I do not believe so.                            |
| 8  | Q. Based upon your understanding of how ITC        |
| 9  | Midwest calculates its rates, would an increase in |
| 10 | their forecasted load increase or reduce the rate, |
| 11 | assuming that there's no increase in the revenue   |
| 12 | requirement?                                       |
| 13 | A. I would assume it would reduce the rate.        |
| 14 | Q. Did you review Mr. Vognsen's testimony as       |
| 15 | part of your participation in this docket?         |
| 16 | A. I did.  |
| 17 | Q. Okay. If we could turn to Vognsen Direct,       |
| 18 | page 13, lines 3 through 9.                        |
| 19 | Do you recall Mr. Vognsen referencing ITC          |
| 20 | Midwest's reference of a denominator issue?        |
| 21 | A. I do.   |
| 22 | Q. And what's your understanding of the            |
| 23 | denominator issue?                                 |
| 24 | A. My understanding of the denominator issue       |
| 25 | is that they have formula rates that are not       |
|    |  |

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| 1  | necessarily tied to the load on their system, and IPL  |
|----|--|
| 2  | has a majority share IPL is the majority of that       |
| 3  | load for their system. So additional changes in IPL's  |
| 4  | overall consumption don't necessarily correlate to a   |
| 5  | similar change in ITCM's Attachment O.                 |
| 6  | Q. So I'll come at the question a slightly             |
| 7  | different way. If I say the word "revenue              |
| 8  | requirement," do you have an understanding of what     |
| 9  | that means?  |
| 10 | A. Yes.  |
| 11 | Q. What does it mean to you? I'll use your             |
| 12 | definition.  |
| 13 | A. It would be the total bucket of revenues            |
| 14 | that a company is, quote-unquote, due from their       |
| 15 | customers.   |
| 16 | Q. Okay. I'm going to call it a pie. The pie           |
| 17 | has to be divided up and paid for by the customers;    |
| 18 | right?   |
| 19 | A. Correct.  |
| 20 | Q. So at least my understanding of the                 |
| 21 | denominator issue is that if load doesn't change, that |
| 22 | pie gets divided as it has been in percentage shares,  |
| 23 | as it has been previously; correct?                    |
| 24 | A. That is true.                                       |
| 25 | Q. Could ITC Midwest reduce its rates by               |
|    |  |

IN RE: INTERSTATE POWER AND LIGHT COMPANY HEARING 06/08/2023

| 1  | reducing its revenue requirement?                      |  |
|----|--|--|
| 2  | A. Yes.  |  |
| 3  | Q. What has been the direction of ITC                  |  |
| 4  | Midwest's revenue requirement in recent years? Has it  |  |
| 5  | grown or decreased?                                    |  |
| 6  | A. Grown.  |  |
| 7  | Q. Will ITC Midwest's future revenue                   |  |
| 8  | requirement be reduced as a result of IPL's pending    |  |
| 9  | Energy Efficiency Plan?                                |  |
| 10 | A. No.   |  |
| 11 | Q. Does IPL have any control over ITC                  |  |
| 12 | Midwest's spending on transmission?                    |  |
| 13 | A. No.   |  |
| 14 | Q. Has IPL ever intervened in an ITC Midwest           |  |
| 15 | electric transmission franchise proceeding claiming    |  |
| 16 | that the proposed transmission costs could be deferred |  |
| 17 | or reduced due to energy efficiency?                   |  |
| 18 | A. No, I don't believe so.                             |  |
| 19 | Q. In your role as a senior regulatory                 |  |
| 20 | relations and policy consultant, are you somewhat      |  |
| 21 | familiar with the rate-making process?                 |  |
| 22 | A. Yes.  |  |
| 23 | Q. Would you agree that when a rate-regulated          |  |
| 24 | utility increases its rate base, it will result in an  |  |
| 25 | increase in earnings?                                  |  |
|    |  |  |

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|------|-----|
|------|-----|

| 1  | A. Potentially.  |
|----|--|
| 2  | Q. Since the sale of transmission assets from          |
| 3  | IPL to ITC Midwest, are you aware of any time when ITC |
| 4  | Midwest was able to reduce the ongoing increases to    |
| 5  | its rate base due to energy efficiency?                |
| 6  | A. I'm not aware of any such time.                     |
| 7  | Q. I think you testified earlier that you had          |
| 8  | reviewed ITC Midwest's Attachment O filing; is that    |
| 9  | correct?   |
| 10 | A. Correct.  |
| 11 | Q. I'm having a hard time. This is another             |
| 12 | subject to check. I'll try it with you.                |
| 13 | PRESIDING OFFICER WRIGHT: That's okay                  |
| 14 | periodically. It's just the responses are not          |
| 15 | helpful.   |
| 16 | If the witness doesn't know, then I just               |
| 17 | wonder: What do we do? Do we come back to the          |
| 18 | hearing if they're wrong?                              |
| 19 | MS. VAN LOON: So I have not seen it be                 |
| 20 | wrong.   |
| 21 | PRESIDING OFFICER WRIGHT: I haven't                    |
| 22 | either, but I'm asking you.                            |
| 23 | MS. VAN LOON: I think if it were wrong, it             |
| 24 | would be fair to cure that part of the record.         |
| 25 | PRESIDING OFFICER WRIGHT: Okay.                        |
|    |  |

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| 1  | BY MS. VAN LOON:                                      |
|----|---|
| 2  | Q. Would you agree since 2017, subject to             |
| 3  | check, that ITC increased the rate base from 2.4      |
| 4  | billion to 3.4 billion based on their Attachment O    |
| 5  | filings?  |
| 6  | A. That sounds in line with what I know, but          |
| 7  | again, I would have to do the math.                   |
| 8  | MS. VAN LOON: I have no further questions             |
| 9  | for this witness.                                     |
| 10 | PRESIDING OFFICER WRIGHT: I have a                    |
| 11 | comment. You're asking questions about information    |
| 12 | that is available, and maybe the next time you bring  |
| 13 | up an exhibit so you can show it to the witness and   |
| 14 | confirm it. I'm just making a suggestion.             |
| 15 | MS. VAN LOON: Sure. Thank you, Your                   |
| 16 | Honor.  |
| 17 | PRESIDING OFFICER WRIGHT: Okay.                       |
| 18 | Ms. Herndon.  |
| 19 | MS. HERNDON: I have no questions. Thank               |
| 20 | you.  |
| 21 | PRESIDING OFFICER WRIGHT: Mr. Mandelbaum.             |
| 22 | MR. MANDELBAUM: No questions. Thank you.              |
| 23 | PRESIDING OFFICER WRIGHT: Okay. ITC, so               |
| 24 | what I'm looking at is your avoided cost analysis. Do |
| 25 | you include transmission costs in that analysis in    |

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1 this docket? 2 THE WITNESS: Yes, yes. 3 PRESIDING OFFICER WRIGHT: Did you include 4 transmission costs, or were transmission costs 5 included in the current plan? THE WITNESS: Yes. 6 7 PRESIDING OFFICER WRIGHT: So if you did not include transmission costs, will it affect the 8 9 cost ratio? 10 THE WITNESS: Yes, likely. 11 PRESIDING OFFICER WRIGHT: And how will 12 that? 13 THE WITNESS: I believe the -- I have not 14 personally done the cost-effective analysis, but I do 15 believe that it would have a negative effect. PRESIDING OFFICER WRIGHT: Which would 16 17 reduce the benefit, right, or reduce the --18 THE WITNESS: RIM (phonetic), yeah, and 19 everything. 20 PRESIDING OFFICER WRIGHT: Okay. That's all I had. Redirect? 21 22 MR. SOWDEN: We have no redirect. Thank 23 you, Your Honor. 24 PRESIDING OFFICER WRIGHT: Thank you. You 25 may step down.

IN RE: INTERSTATE POWER AND LIGHT COMPANY HEARING 06/08/2023

| 1  | I apologize, but it's a sticking point with           |
|----|---|
| 2  | me.   |
| 3  | THE WITNESS: Thank you. Very valid.                   |
| 4  | PRESIDING OFFICER WRIGHT: So does that                |
| 5  | complete your testimony?                              |
| 6  | MR. SOWDEN: Yes, Your Honor, that                     |
| 7  | completes Interstate Power and Light Company's        |
| 8  | testimony.  |
| 9  | PRESIDING OFFICER WRIGHT: Okay. We'll go              |
| 10 | to OCA, then. You can call your first witness.        |
| 11 | MS. JOHNSON: OCA calls Scott Bents.                   |
| 12 | SCOTT BENTS,  |
| 13 | called as a witness by the Office of Consumer         |
| 14 | Advocate, being first duly sworn by Presiding Officer |
| 15 | Wright, was examined and testified as follows:        |
| 16 | PRESIDING OFFICER WRIGHT: Have a seat.                |
| 17 | You may proceed.                                      |
| 18 | DIRECT EXAMINATION                                    |
| 19 | BY MS. JOHNSON:                                       |
| 20 | Q. Good afternoon. Will you please state your         |
| 21 | name and position for the record.                     |
| 22 | A. My name is Scott Bents. I'm a utility              |
| 23 | regulation engineer at the Office of Consumer         |
| 24 | Advocate.   |
| 25 | Q. Are you the same Scott Bents that prepared         |
|    |   |

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| 1  | direct and surrebuttal testimony to be filed in this   |
|----|--|
| 2  | case along with associated exhibits?                   |
| 3  | A. Yes, I am.  |
| 4  | Q. Do you have any changes you'd like to make          |
| 5  | to any of those documents?                             |
| 6  | A. No, I do not.                                       |
| 7  | MS. JOHNSON: Since your testimony and                  |
| 8  | exhibits have been admitted into the record by         |
| 9  | stipulation, I tender Mr. Bents for cross-examination. |
| 10 | PRESIDING OFFICER WRIGHT: Okay.                        |
| 11 | MR. SOWDEN: We have no questions for this              |
| 12 | witness.   |
| 13 | PRESIDING OFFICER WRIGHT: Ms. Van Loon.                |
| 14 | MS. VAN LOON: No questions, Your Honor.                |
| 15 | PRESIDING OFFICER WRIGHT: Ms. Herndon.                 |
| 16 | MS. HERNDON: No questions.                             |
| 17 | PRESIDING OFFICER WRIGHT: Mr. Mandelbaum.              |
| 18 | MR. MANDELBAUM: No questions.                          |
| 19 | PRESIDING OFFICER WRIGHT: Let me look real             |
| 20 | quick at my notes.                                     |
| 21 | (Brief pause.)   |
| 22 | PRESIDING OFFICER WRIGHT: I don't believe              |
| 23 | I have any questions either. Thank you. You may step   |
| 24 | down.  |
| 25 | You may call your next witness.                        |
|    |  |

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| 1  | MS. JOHNSON: OCA calls Blake Kruger.                  |
|----|---|
| 2  | BLAKE KRUGER,   |
| 3  | called as a witness by the Office of Consumer         |
| 4  | Advocate, being first duly sworn by Presiding Officer |
| 5  | Wright, was examined and testified as follows:        |
| 6  | PRESIDING OFFICER WRIGHT: Proceed.                    |
| 7  | DIRECT EXAMINATION                                    |
| 8  | BY MS. JOHNSON:                                       |
| 9  | Q. Could you please state your name and               |
| 10 | position for the record?                              |
| 11 | A. Sure. My name is Blake Kruger,                     |
| 12 | K-r-u-g-e-r. I am a senior utility analyst with the   |
| 13 | Office of Consumer Advocate.                          |
| 14 | Q. Are you the same Blake Kruger who prepared         |
| 15 | direct and surrebuttal testimony to be filed in this  |
| 16 | case along with associated exhibits?                  |
| 17 | A. I am.  |
| 18 | Q. Do you have any changes you'd like to make         |
| 19 | to any of those documents?                            |
| 20 | A. I do not.  |
| 21 | MS. JOHNSON: Since your testimony and                 |
| 22 | exhibits have been admitted into the record by        |
| 23 | stipulation, I tender Mr. Kruger for                  |
| 24 | cross-examination.                                    |
| 25 | PRESIDING OFFICER WRIGHT: Mr. Sowden.                 |
| 1  |   |

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| [  |  |
|----|--|
| 1  | MR. SOWDEN: IPL has no questions for this              |
| 2  | witness.   |
| 3  | PRESIDING OFFICER WRIGHT: Ms. Van Loon.                |
| 4  | MS. VAN LOON: No questions, Your Honor.                |
| 5  | PRESIDING OFFICER WRIGHT: Ms. Herndon.                 |
| 6  | MS. HERNDON: No questions.                             |
| 7  | PRESIDING OFFICER WRIGHT: Mr. Mandelbaum.              |
| 8  | MR. MANDELBAUM: No questions.                          |
| 9  | PRESIDING OFFICER WRIGHT: Okay. Let me                 |
| 10 | check.   |
| 11 | (Brief pause.)   |
| 12 | PRESIDING OFFICER WRIGHT: So for your                  |
| 13 | proposal that IPL offer free smart thermostats coupled |
| 14 | with enrollment in the Demand Response Program for     |
| 15 | low-income households, did you do a cost-effectiveness |
| 16 | analysis?  |
| 17 | THE WITNESS: That was not available. The               |
| 18 | only thing that I was able to do was note that the     |
| 19 | Demand Response portion of IPL's plan is very          |
| 20 | cost-effective and one of the highest cost-effective   |
| 21 | ratios. I think it's over 4:1. It's in my direct       |
| 22 | testimony.   |
| 23 | And the cost of a smart thermostat is                  |
| 24 | significantly less expensive than what IPL had         |
| 25 | proposed, and so from that angle, we arrived at the    |
|    |  |

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| 1  | fact that the smart thermostat coupled with the Demand |
|----|--|
| 2  | Response would greatly improve the cost-effectiveness  |
| 3  | of that portion of that offering.                      |
| 4  | PRESIDING OFFICER WRIGHT: Do you or does               |
| 5  | OCA support the proposed limited-income program as     |
| 6  | IPL's put in its plan?                                 |
| 7  | THE WITNESS: No.                                       |
| 8  | PRESIDING OFFICER WRIGHT: What parts of it             |
| 9  | do you disagree with?                                  |
| 10 | THE WITNESS: Well, there's several parts               |
| 11 | of it that I disagree with. Part of it is based on     |
| 12 | the EM&V recommendation that which is why IPL          |
| 13 | discontinued the predecessor of this program from 2014 |
| 14 | to 2017, which is the Home Energy Savings Program, and |
| 15 | said it wasn't cost-effective.                         |
| 16 | I know there's quite a bit of debate on                |
| 17 | what "cost-effective" means for low-income.            |
| 18 | Low-income is excluded from that, so the definition of |
| 19 | low-income is yet to be determined. There's been       |
| 20 | quite a bit of debate about that.                      |
| 21 | Opinion Dynamics, from what was alluded to             |
| 22 | earlier this morning, I think, when Ms. Gehrke was on  |
| 23 | the stand, they arrived at a different conclusion      |
| 24 | saying that the limited-income program should be       |
| 25 | expanded to just above 200 percent. I think our        |
|    |  |

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| 1  | exception is the cost of the program and also looking |
|----|---|
| 2  | at the 200 to 300 percent, all the way up to 300      |
| 3  | percent.  |
| 4  | So when I testified, I have a table in my             |
| 5  | testimony that showed and Ms. Gehrke alluded to       |
| 6  | this that 300 percent of a federal poverty line of    |
| 7  | a family of four is up to \$90,000. I also have in my |
| 8  | testimony that the median household income for the    |
| 9  | state of Iowa is roughly \$65,000.                    |
| 10 | Given the additional IRA funding that's               |
| 11 | available that could meet some of those needs for     |
| 12 | those higher-income folks of 150 percent of the       |
| 13 | federal poverty line, it didn't seem like it was      |
| 14 | cost-justified to provide a 75 percent rebate in a    |
| 15 | slew of measures to customers that are earning up to  |
| 16 | 300 percent of the federal poverty line. And also     |
| 17 | because there is that co-pay component of it, the     |
| 18 | limited-income program would more naturally drift     |
| 19 | toward the 300 percent of the federal poverty line.   |
| 20 | In addition, when we were talking about the           |
| 21 | limited-income program, we had some testimony this    |
| 22 | morning that said it was only going to touch 76       |
| 23 | customers, and I believe it was identified as 76      |
| 24 | customers per year. It was identified as a pilot      |
| 25 | program, and it was only going to touch a specific    |

### IN RE: INTERSTATE POWER AND LIGHT COMPANY HEARING 06/08/2023

| 1  | community or maybe one or two communities.              |
|----|---|
| 2  | We thought that in our approach we could                |
| 3  | touch significantly more communities. So at 76          |
| 4  | customers, based on the budget that IPL has             |
| 5  | provided I think that was in response to a CEDI         |
| 6  | data request that we reviewed this morning their        |
| 7  | budget is between \$350,000 to \$400,000 for this       |
| 8  | program.  |
| 9  | When you cut that over 76 customers, that's             |
| 10 | about \$5,000 per customer. So \$5,000 per home.        |
| 11 | And the program that we're recommending,                |
| 12 | which is the smart thermostat coupled with the Demand   |
| 13 | Response, we think it would provide some meaningful     |
| 14 | savings to a much wider net or a much wider number of   |
| 15 | customers. If you assume that the smart thermostat      |
| 16 | cost is around \$100 or in that range and we saw        |
| 17 | this morning also that \$62 was the assumed             |
| 18 | installation rate or labor costs to install a smart     |
| 19 | thermostat.   |
| 20 | So if you just assume we're looking at                  |
| 21 | about \$162 per home versus \$5,000 per home, there's a |
| 22 | much wider number of customers that we can reach        |
| 23 | through our recommendation, and it would also be        |
| 24 | cost-effective.   |
| 25 | So I think our view is that, based on the               |
|    |   |

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| 1 | recommendations from the 2014 to 2018 plan, we need to |
|---|--|
| 2 | be mindful of the dollars we're spending, especially   |
| 3 | when we exceed that 200 to 300 percent, where I would  |
| 4 | call that some gray area in terms of whether or not    |
| 5 | low-income is truly 200 to 300 percent. I would say,   |
| 6 | if anything, the Opinion Dynamics would say it's just  |
| 7 | over 200 percent.                                      |

We've also had a lot of discussion that the 8 9 below 200 percent, we're having a backlog where we're 10 not reaching those customers. So I think our approach 11 would reach those customers as well by providing them the smart thermostat and enrollment in the Demand 12 13 Response Program, which would also give them an annual 14 credit to their bill, which would be meaningful to 15 this customer base as well.

16 I've also recommended that IPL assist some 17 of these customers in their options, as availability 18 with regard to time-of-use rates, where they could 19 save money or different rate options in which they 20 could see meaningful bill savings, and that's from the 21 testimony of Tim Tessier.

PRESIDING OFFICER WRIGHT: I understand.
You kind of went beyond my question, but that's okay.
THE WITNESS: Sorry.
PRESIDING OFFICER WRIGHT: So really to sum

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| 1  | it up, you're suggesting that those dollars be shifted |
|----|--|
| 2  |  |
|    | to the low-income program, right, with your smartphone |
| 3  | [sic] and demand response?                             |
| 4  | THE WITNESS: The smart thermostat?                     |
| 5  | PRESIDING OFFICER WRIGHT: Smart                        |
| 6  | thermostat, yes.                                       |
| 7  | THE WITNESS: More so, yes. I think we                  |
| 8  | could make it available to just above the 200 percent. |
| 9  | I don't have a bright line cutoff of what              |
| 10 | that would be. I don't mention that, but I think that  |
| 11 | would be more fitting with the Opinion Dynamics        |
| 12 | recommendation, EM&V report.                           |
| 13 | PRESIDING OFFICER WRIGHT: Just to go back,             |
| 14 | I think you started out with there is no definition of |
| 15 | low-income?  |
| 16 | THE WITNESS: Correct.                                  |
| 17 | PRESIDING OFFICER WRIGHT: Do you have a                |
| 18 | recommendation for what a low-income customer would    |
| 19 | be?  |
| 20 | THE WITNESS: Well, I think the cleanest                |
| 21 | way would be if you qualify and you're eligible for    |
| 22 | the Weatherization Assistance Program, which is 200    |
| 23 | percent of the federal poverty line.                   |
| 24 | PRESIDING OFFICER WRIGHT: All right.                   |
| 25 | Thank you.   |
|    |  |

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| 1  | Let me check and make sure I don't have                |
|----|--|
| 2  | another one.   |
| 3  | (Brief pause.)   |
| 4  | PRESIDING OFFICER WRIGHT: So is it your                |
| 5  | understanding that if the limited-income program is    |
| 6  | included that it does not need to be included in the   |
| 7  | overall cost-effectiveness analysis?                   |
| 8  | THE WITNESS: I think it would need to be.              |
| 9  | Our stance is that that's 200, 300 percent when you're |
| 10 | talking \$90,000 annual income for a family of four.   |
| 11 | I don't know that it can necessarily be                |
| 12 | excluded. Again, that's based on the definition of     |
| 13 | what low-income is.                                    |
| 14 | PRESIDING OFFICER WRIGHT: Okay. Thanks.                |
| 15 | Does IPL have any questions based on my                |
| 16 | questions?   |
| 17 | MR. SOWDEN: No questions.                              |
| 18 | PRESIDING OFFICER WRIGHT: Ms. Van Loon?                |
| 19 | MS. VAN LOON: No questions.                            |
| 20 | PRESIDING OFFICER WRIGHT: Ms. Herndon?                 |
| 21 | MS. HERNDON: No questions.                             |
| 22 | PRESIDING OFFICER WRIGHT: Mr. Mandelbaum?              |
| 23 | MR. MANDELBAUM: No questions.                          |
| 24 | PRESIDING OFFICER WRIGHT: Redirect?                    |
| 25 | MS. JOHNSON: We have no redirect.                      |

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| 1  | PRESIDING OFFICER WRIGHT: Thank you. You              |
|----|---|
| 2  | may step down.  |
| 3  | Call your next witness.                               |
| 4  | MS. JOHNSON: OCA calls Marcos Munoz.                  |
| 5  | MARCOS MUNOZ,   |
| 6  | called as a witness by the Office of Consumer         |
| 7  | Advocate, being first duly sworn by Presiding Officer |
| 8  | Wright, was examined and testified as follows:        |
| 9  | PRESIDING OFFICER WRIGHT: Have a seat.                |
| 10 | You may proceed.                                      |
| 11 | DIRECT EXAMINATION                                    |
| 12 | BY MS. JOHNSON:                                       |
| 13 | Q. Please state your name and position for the        |
| 14 | record.   |
| 15 | A. Marcos Munoz. I'm a senior utility analyst         |
| 16 | at the OCA.   |
| 17 | Q. Are you the same Marcos Munoz who prepared         |
| 18 | direct, surrebuttal, rebuttal and cross-rebuttal      |
| 19 | testimony in this document?                           |
| 20 | A. Subject to check.                                  |
| 21 | I'm just kidding. Yes.                                |
| 22 | MS. VAN LOON: Too soon.                               |
| 23 | A. Yes.   |
| 24 | PRESIDING OFFICER WRIGHT: So you want to              |
| 25 | get along with me or not?                             |

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| 1  | (Laughter.)  |
|----|--|
| 2  | BY MS. JOHNSON:  |
| 3  | Q. Do you have any changes you'd like to make          |
| 4  | to any of these documents?                             |
| 5  | A. I do not.   |
| 6  | MS. JOHNSON: Since your testimony and                  |
| 7  | exhibits have been admitted into the record by         |
| 8  | stipulation, I tender Mr. Munoz for cross-examination. |
| 9  | PRESIDING OFFICER WRIGHT: IPL?                         |
| 10 | MR. SOWDEN: IPL has no questions for this              |
| 11 | witness.   |
| 12 | PRESIDING OFFICER WRIGHT: Ms. Van Loon?                |
| 13 | MS. VAN LOON: Thank you, Your Honor.                   |
| 14 | CROSS-EXAMINATION                                      |
| 15 | BY MR. VAN LOON:                                       |
| 16 | Q. Mr. Munoz, can we start with your direct            |
| 17 | testimony on page 29?                                  |
| 18 | A. Yes. Let me get there, or do you want               |
| 19 | to I can go in, or do you want to pull it up?          |
| 20 | Either way.  |
| 21 | PRESIDING OFFICER WRIGHT: It's really up               |
| 22 | to you.  |
| 23 | THE WITNESS: I have it right here.                     |
| 24 | PRESIDING OFFICER WRIGHT: We're going to               |
| 25 | pull it up for everyone else.                          |

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| 1  | MS. VAN LOON: In particular, I'm going to             |
|----|---|
| 2  | draw his attention to lines 5 through 7.              |
| 3  | A. Five through 7?                                    |
| 4  | BY MS. VAN LOON:                                      |
| 5  | Q. Yes. My understanding of your testimony,           |
| 6  | Mr. Munoz, is that IPL's interruptible program has    |
| 7  | allowed IPL to avoid building or obtaining new        |
| 8  | generation capacity and enhancing the flexibility and |
| 9  | reliability of IPL's system.                          |
| 10 | Did I get that wrong?                                 |
| 11 | A. That is right.                                     |
| 12 | Q. Do you know how long IPL's interruptible           |
| 13 | program has been in existence?                        |
| 14 | A. Can I not say "subject to check"?                  |
| 15 | PRESIDING OFFICER WRIGHT: I wouldn't.                 |
| 16 | BY MS. VAN LOON:                                      |
| 17 | Q. Would 40 years be a reasonable period of           |
| 18 | time?   |
| 19 | A. I would say that a ratio somewhere around          |
| 20 | Dave Vognsen's age. I will take the 40 years. That's  |
| 21 | fine.   |
| 22 | Q. Do you know whether or not IPL is in an            |
| 23 | excess capacity situation?                            |
| 24 | A. Right now in excess capacity, you said?            |
| 25 | Q. Yes.   |
|    |   |

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| 1  | A. I don't believe so. Based on the loading            |
|----|--|
| 2  | capabilities table that was submitted in Exhibit 12, I |
| 3  | believe the first few years I don't know if it was     |
| 4  | within the plan.                                       |
| 5  | So there's two ways of looking at it. I                |
| 6  | think within the first year of the plan they're        |
| 7  | predicting a shortfall.                                |
| 8  | Q. I guess I'll put the question another way.          |
| 9  | Has IPL proposed to build additional                   |
| 10 | capacity?  |
| 11 | A. Yes. I mean, I believe so. They're                  |
| 12 | wanting to.  |
| 13 | Q. Has IPL requested interruptible customers           |
| 14 | curtail load on the interruptible program to do so by  |
| 15 | MISO?  |
| 16 | A. Are they required to do so?                         |
| 17 | Q. Has IPL requested interruptible customers           |
| 18 | to curtail load?                                       |
| 19 | A. Yes, yes, for sure.                                 |
| 20 | Q. Do you know when they most recently did so?         |
| 21 | A. I believe I think in one of the Data                |
| 22 | Request 27. I think it's in my surrebuttal exhibit.    |
| 23 | I think it was December 2022, I want to say.           |
| 24 | Q. Do you know whether or not IPL's                    |
| 25 | interruptible customers incur costs to participate in  |

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| 1  | the interruptible program?                       |
|----|--|
| 2  | A. I would assume so.                            |
| 3  | What do you mean by "costs"? Can you be          |
| 4  | more specific?                                   |
| 5  | Do they have diesel backup generators or do      |
| 6  | they Do they incur, like, foregone operating     |
| 7  | revenues, something like that?                   |
| 8  | Q. I think both of those things can be costs.    |
| 9  | A. For sure.                                     |
| 10 | Q. Okay. Do all customers benefit from IPL's     |
| 11 | interruptible program?                           |
| 12 | A. Yes.  |
| 13 | Q. Without the interruptible program, would      |
| 14 | IPL need more capacity?                          |
| 15 | A. Yes.  |
| 16 | Q. If IPL builds additional capacity, are        |
| 17 | those costs for all customers?                   |
| 18 | A. Adult customers or all customers?             |
| 19 | Q. All.  |
| 20 | A. All customers. Yes.                           |
| 21 | Q. Do you know whether or not IPL forecasted     |
| 22 | any excess capacity sales for the 2023-2024 MISO |
| 23 | planning year?                                   |
| 24 | A. I do not. I don't know the answer to that.    |
| 25 | Do you mean they submitted that within the       |
|    |  |

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| 1  | tract? If that's a consideration of the resource       |
|----|--|
|    |  |
| 2  | adequacy requirements they submit to MISO, or are you  |
| 3  | asking me in the EAC, for example, excess capacity     |
| 4  | sales?   |
| 5  | Q. I didn't hear the first part of your                |
| 6  | answer, so I'll try my question back to you again.     |
| 7  | A. That's fine.  |
| 8  | Q. If you don't know, fine.                            |
| 9  | Do you know whether IPL forecasted any                 |
| 10 | excess capacity sales for the 2023-2024 MISO planning  |
| 11 | year?  |
| 12 | A. I don't think so, but again sorry.                  |
| 13 | You're asking me if IPL, in the loading capability     |
| 14 | table projection that I submitted as part of the       |
| 15 | additional requirements, Exhibit 12, if they           |
| 16 | submitted if they have excess capacity sales,          |
| 17 | excess capacity in that table? Did they submit it      |
| 18 | into MISO for resource adequacy?                       |
| 19 | Q. MISO for resource adequacy.                         |
| 20 | A. I haven't seen what IPL submitted yet, so I         |
| 21 | don't know the answer to that clearly, but I will take |
| 22 | it No. Okay.   |
| 23 | Q. If you could go to page 6 of your                   |
| 24 | cross-rebuttal testimony and specifically lines 12     |
| 25 | through 16.  |
|    |  |

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| 1  | A. Yes.   |
|----|---|
| 2  | Q. Are you aware of the MISO's news release           |
| 3  | that accompanied the release of the auction results?  |
| 4  | A. Like, the presentation of May 19 or                |
| 5  | something else?                                       |
| 6  | Q. I'll circulate a document that may help            |
| 7  | provide some more context.                            |
| 8  | A. Okay.  |
| 9  | PRESIDING OFFICER WRIGHT: So this will be             |
| 10 | LEG Hearing Exhibit 2; is that correct?               |
| 11 | MS. VAN LOON: Yes, Your Honor.                        |
| 12 | A. I think this was also made part of the             |
| 13 | presentation. I think there was some disclaimer maybe |
| 14 | on the May 19th information that included similar     |
| 15 | language to this.                                     |
| 16 | BY MS. VAN LOON:                                      |
| 17 | Q. So you think you've seen this document             |
| 18 | before as a component of a larger document?           |
| 19 | A. Of the May 19th presentation. That's               |
| 20 | right.  |
| 21 | Q. Mr. Munoz, if I could direct your attention        |
| 22 | to the green, highlighted language.                   |
| 23 | A. Yeah.  |
| 24 | Q. Can you read that for me?                          |
| 25 | A. "With the rapid change of the generation           |
|    |   |

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| 1  | fleet, we continue to see uncertainty and volatility   |
|----|--|
| 2  | in the auction results year-over-year, and managing    |
| 3  | the system in real-time is becoming more challenging," |
| 4  | Moeller adds. "Actions taken by market participants    |
| 5  | this year, such as delaying resource retirements and   |
| 6  | making additional, existing capacity available via     |
| 7  | imports may not be repeatable in the future, and this  |
| 8  | year we are all still susceptible to supply shortages  |
| 9  | in extreme situations."                                |
| 10 | MS. VAN LOON: Thank you. At this time I                |
| 11 | would move to admit LEG Hearing Exhibit 2.             |
| 12 | (LEG Hearing Exhibit 2 was offered into                |
| 13 | evidence.)   |
| 14 | PRESIDING OFFICER WRIGHT: Any objection to             |
| 15 | LEG Hearing Exhibit 2?                                 |
| 16 | (No response.)   |
| 17 | PRESIDING OFFICER WRIGHT: Hearing none,                |
| 18 | it's admitted into the record.                         |
| 19 | (LEG Hearing Exhibit 2 was admitted into               |
| 20 | evidence.)   |
| 21 | MS. VAN LOON: Thank you, Your Honor.                   |
| 22 | BY MS. VAN LOON:                                       |
| 23 | Q. If we could turn to page 11 of your                 |
| 24 | surrebuttal testimony and specifically lines 15        |
| 25 | through 17   |
|    |  |

IN RE: INTERSTATE POWER AND LIGHT COMPANY HEARING 06/08/2023

| 1  | A. Yep.  |
|----|--|
| 2  | Q my understanding of your testimony is              |
| 3  | that in your view traditional capacity resources are |
| 4  | dispatchable, available and reliable. Do I have that |
| 5  | right?   |
| 6  | A. That's right.                                     |
| 7  | Q. Has the interruptible program been a              |
| 8  | reliable resource?                                   |
| 9  | A. In the terms of reliability, meaning it's         |
| 10 | part of the CRC accreditation requirements, I'll say |
| 11 | yes. In terms of performance, I would say no.        |
| 12 | There's a difference between reliability             |
| 13 | and dispatchability that needs to be, like, a        |
| 14 | condition upon the response to the question that     |
| 15 | you're asking.                                       |
| 16 | Q. I'll try a slightly different question.           |
| 17 | Has the interruptible program proved to be           |
| 18 | a dispatchable resource?                             |
| 19 | A. Yes.  |
| 20 | Q. Is the interruptible program an available         |
| 21 | resource throughout the entire year?                 |
| 22 | A. Not 100 percent.                                  |
| 23 | Q. In some percentage, is it available through       |
| 24 | the entire year?                                     |
| 25 | A. It is available. It is not available from         |

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| 1  | the perspective of performance.                        |
|----|--|
| 2  | Let me give you an example. A CT has a                 |
| 3  | particular component of dispatch. When IPL submits     |
| 4  | Let's take an example. Emory 1, 2, 3. 150 megawatts    |
| 5  | in each of the CT compositions.                        |
| 6  | There's a forced outage rate that comes                |
| 7  | attached to that particular unit that when you credit  |
| 8  | you get the accreditation requirements, based on the   |
| 9  | high CAP, then you get the performance, and you have a |
| 10 | standard, right? So you have the adjustment of forced  |
| 11 | outage rate between ICAP and new CAP.                  |
| 12 | When you are dealing with a Demand Response            |
| 13 | Program that has the operational flexibility that is   |
| 14 | not available to a CT, those characteristics are not   |
| 15 | analogous with the other. The performance and          |
| 16 | characteristics of a Demand Response Program like an   |
| 17 | interruptible program, because of the design and       |
| 18 | flexibility, has a different composition than a        |
| 19 | dispatchable resource like a simple combustible        |
| 20 | turbine.   |
| 21 | Q. Are you saying the interruptible program is         |
| 22 | not available at all during certain periods of time or |
| 23 | available less?  |
| 24 | A. Less, correct.                                      |
| 25 | Q. Okay. Are you familiar with MISO's                  |

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| 1  | Resource Adequacy Business Practice Manual pertaining |
|----|---|
| 2  | to Demand Response?                                   |
| 3  | A. Yes, a little bit.                                 |
| 4  | PRESIDING OFFICER WRIGHT: LEG Hearing                 |
| 5  | Exhibit 3; correct?                                   |
| 6  | MS. VAN LOON: Yes, Your Honor.                        |
| 7  | A. I assume you want me to go to the                  |
| 8  | highlighted yellow portion?                           |
| 9  | BY MS. VAN LOON:                                      |
| 10 | Q. I'm going to ask you a couple of foundation        |
| 11 | questions first. I don't think everyone has it yet,   |
| 12 | so I'm pausing on purpose.                            |
| 13 | Mr. Munoz, is that part of the business               |
| 14 | practice manual you're familiar with?                 |
| 15 | A. To some extent, yes.                               |
| 16 | MS. VAN LOON: At this time I would move to            |
| 17 | admit Large Energy Group Exhibit 3.                   |
| 18 | (LEG Hearing Exhibit 3 was offered into               |
| 19 | evidence.)  |
| 20 | PRESIDING OFFICER WRIGHT: Any objection to            |
| 21 | LEG Hearing Exhibit 3?                                |
| 22 | (No response.)  |
| 23 | PRESIDING OFFICER WRIGHT: Hearing none,               |
| 24 | that exhibit is admitted into the record.             |
| 25 |   |

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| 1  | (LEG Hearing Exhibit 3 was admitted into               |
|----|--|
| 2  | evidence.)   |
| 3  | MS. VAN LOON: Thank you, Your Honor.                   |
| 4  |  |
| 5  | BY MR. VAN LOON:                                       |
| 6  | Q. Mr. Munoz, you anticipated my question. If          |
| 7  | you could go to the highlighted section beginning on   |
| 8  | the second page?                                       |
| 9  | A. Do you want me to read it?                          |
| 10 | Q. Yes, please.  |
| 11 | A. "A Demand Resource shall mean a resource            |
| 12 | registered with MISO defined as Interruptible Load or  |
| 13 | Direct Load Control Management and other resources     |
| 14 | that result in additional and verifiable reductions in |
| 15 | end-use customer demand during an Emergency."          |
| 16 | Q. Thank you. I want to talk a little bit now          |
| 17 | about what happens if interruptible customers are not  |
| 18 | in compliance with IPL's interruptible tariff.         |
| 19 | I understand that there are penalties for              |
| 20 | non-compliance. Are you aware of penalties?            |
| 21 | A. In the MISO or IPL's tariff?                        |
| 22 | Q. In IPL's tariff.                                    |
| 23 | A. Yeah.   |
| 24 | Q. If you want, you have a copy of IPL's               |
| 25 | interruptible tariff in front of you, but my question  |
|    |  |

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| 1  | was intended to be pretty high-level.                 |
|----|---|
| 2  | A. Yep.   |
| 3  | Q. Do you think that the penalties for                |
| 4  | non-compliance are meaningful?                        |
| 5  | A. No.  |
| 6  | Q. Okay. And why not?                                 |
| 7  | A. Because it's \$26 a kW. I mean, it's a             |
| 8  | ratio of the value of CONE.                           |
| 9  | I think there if I'm not mistaken, I                  |
| 10 | think in I don't know if it's in this VPN manual,     |
| 11 | but I think it's somewhere around I can't remember    |
| 12 | if it was 1500 per megawatt hour at nonparticipation  |
| 13 | on the for the demand response resources for          |
| 14 | interruptible load, for tariffable load.              |
| 15 | Q. Mr. Munoz, do you know whether or not              |
| 16 | customers can be curtailed due to reliability         |
| 17 | concerns?   |
| 18 | A. Yes.   |
| 19 | Q. Can customers be curtailed for energy              |
| 20 | efficiency purposes to reduce peak demand?            |
| 21 | A. Yes.   |
| 22 | Q. Can interruptible customers be curtailed           |
| 23 | for energy efficiency in order to reduce energy usage |
| 24 | due to high LMP rates?                                |
| 25 | A. Yes.   |
|    |   |

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| 1  | Q. Have IPL's interruptible customers been             |
|----|--|
| 2  | curtailed in such situations?                          |
| 3  | A. One, two, three, yes. One less frequent             |
| 4  | than two and three, but yes.                           |
| 5  | Q. Mr. Munoz, if we could turn to your                 |
| 6  | surrebuttal testimony at page 13, lines 13 through 18. |
| 7  | A. Yep.  |
| 8  | Q. My understanding is that you're referencing         |
| 9  | MidAmerican's interruptible program and how            |
| 10 | MidAmerican calculates its incentives; is that         |
| 11 | correct?   |
| 12 | A. Uh-huh. Yes. Sorry.                                 |
| 13 | Q. Does MidAmerican currently have excess              |
| 14 | capacity?  |
| 15 | A. Yeah. I Yes.  |
| 16 | Q. Has MidAmerican Energy filed an Integrated          |
| 17 | Resources Plan with the Board?                         |
| 18 | A. I don't believe so.                                 |
| 19 | Q. In measuring cost-effectiveness of IPL,             |
| 20 | including the interruptible program, is that based     |
| 21 | upon the long-term avoidance of capacity?              |
| 22 | A. You mean, MidAmerican or                            |
| 23 | Q. I'm sorry. I switched back to the EEP that          |
| 24 | we're currently considering.                           |
| 25 | A. Yeah. It's long-term avoidance, yes.                |
|    |  |

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| 1  | Q. And over the past two or three decades, as          |
|----|--|
| 2  | a general matter, would you say that the cost of       |
| 3  | capacity has increased, decreased or stayed the same?  |
| 4  | A. It has It stayed relatively stable in               |
| 5  | years past except for the last year where it increased |
| 6  | to \$236 per megawatt per day, the previous PRA        |
| 7  | results.   |
| 8  | MS. VAN LOON: Thank you, Mr. Munoz.                    |
| 9  | I don't have any further questions for this            |
| 10 | witness.   |
| 11 | PRESIDING OFFICER WRIGHT: Ms. Herndon.                 |
| 12 | CROSS-EXAMINATION                                      |
| 13 | BY MS. HERNDON:  |
| 14 | Q. Good afternoon, Mr. Munoz.                          |
| 15 | A. Good afternoon.                                     |
| 16 | Q. Could I direct you to page 3 of your                |
| 17 | cross-rebuttal testimony, line 11, where you state     |
| 18 | that it is practically impossible to know the economic |
| 19 | cost function for each individual interruptible        |
| 20 | customer?  |
| 21 | Do you see that?                                       |
| 22 | A. Yes.  |
| 23 | Q. Would you agree that there are several              |
| 24 | important factors that an interruptible customer would |
| 25 | consider in deciding whether to participate in the     |
|    |  |

IN RE: INTERSTATE POWER AND LIGHT COMPANY HEARING 06/08/2023

| 1  | interruptible program?                                 |
|----|--|
| 2  | A. Yeah, for sure.                                     |
| 3  | Q. Like, for instance, the perceived frequency         |
| 4  | of interruptions?                                      |
| 5  | A. That's perhaps true, yes.                           |
| 6  | Q. How about the cost of interruption?                 |
| 7  | A. The cost? You mean the Yes, yes.                    |
| 8  | Q. And that could include things like lost             |
| 9  | production, equipment damage, labor costs, the cost of |
| 10 | going through the interruption and setting up          |
| 11 | communication protocols, training staff, things like   |
| 12 | that?  |
| 13 | A. Yep, absolutely.                                    |
| 14 | Q. And, of course, the value of the credit             |
| 15 | itself?  |
| 16 | A. Absolutely. So the cross-function for the           |
| 17 | customers to pay for the interruptible credits should  |
| 18 | be included in that consideration, too.                |
| 19 | Q. Could we now go to page 5 of your                   |
| 20 | cross-rebuttal starting at line 5? You make the point  |
| 21 | here that there are only so many available customers   |
| 22 | for the interruptible program; right?                  |
| 23 | A. That's correct.                                     |
| 24 | Q. Would you agree that IPL has indicated that         |
| 25 | it will need more interruptible capacity than it       |

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| 1  | currently has?   |
|----|--|
| 2  | A. There is I feel IPL has a targeted                  |
| 3  | amount of Demand Response as part of the plan that is  |
| 4  | a little bit higher that is higher than what they      |
| 5  | currently have in the current plan. That's right.      |
| 6  | Q. And IPL states in their Assessment of               |
| 7  | Potential that the potential for interruptible load    |
| 8  | will grow; correct?                                    |
| 9  | A. That's right, but let me clarify that.              |
| 10 | They stated that it will grow above the current plan.  |
| 11 | I don't think that they're intending to                |
| 12 | that their targeted amounts in any data that we        |
| 13 | received shows any higher level than the 225 megawatt  |
| 14 | that is currently part of the proposed plan.           |
| 15 | Q. Are you disagreeing that their Assessment           |
| 16 | of Potential didn't show that it could grow by as much |
| 17 | as 60 megawatts by 2028 in the referenced case and     |
| 18 | 100 megawatts in the high case?                        |
| 19 | A. Yes, that is correct. They established              |
| 20 | that.  |
| 21 | Q. Moving to page 6, starting at page 6                |
| 22 | towards the bottom of your page in your                |
| 23 | cross-rebuttal, you discuss the MISO auction results   |
| 24 | for planning year 2023 to '24; correct?                |
| 25 | A. Yes.  |

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| 1  | Q. Is your discussion there based on the             |
|----|--|
| 2  | presentation report that's dated May 19th of 2023?   |
| 3  | A. That's correct.                                   |
| 4  | Q. I'd like to offer the full report as an           |
| 5  | exhibit. This would be IBEC Hearing Exhibit 1.       |
| 6  | (IBEC Hearing Exhibit 1 was offered into             |
| 7  | evidence.)   |
| 8  | BY MS. HERNDON:                                      |
| 9  | Q. While that's being passed out, if we could        |
| 10 | scroll farther down into the cross-rebuttal into the |
| 11 | next page, the top of 7.                             |
| 12 | At the top of page 7, it shows a Chart 1.            |
| 13 | This is the chart you pulled from page 4 of IBEC     |
| 14 | Hearing Exhibit 1?                                   |
| 15 | A. Yes, that's right.                                |
| 16 | Q. So you're familiar with this report?              |
| 17 | A. Yes, just on I don't remember                     |
| 18 | everything, but yes. We can go through it.           |
| 19 | Q. I understand you didn't author it. I'm            |
| 20 | asking if you're familiar with it.                   |
| 21 | I would move to admit IBEC Hearing                   |
| 22 | Exhibit 1.   |
| 23 | (IBEC Hearing Exhibit 1 was offered into             |
| 24 | evidence.)   |
| 25 | PRESIDING OFFICER WRIGHT: Any objections             |
|    |  |

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| 1  | to IBEC Hearing Exhibit 1?                             |
|----|--|
| 2  | (No response.)   |
| 3  | PRESIDING OFFICER WRIGHT: Hearing none,                |
| 4  | that exhibit is admitted into the record.              |
| 5  | (IBEC Hearing Exhibit 1 was admitted into              |
| 6  | evidence.)   |
| 7  | MS. HERNDON: Thank you, Your Honor.                    |
| 8  | Q. In IBEC Hearing Exhibit 1, could we move to         |
| 9  | Slide 9. Mr. Munoz, would you please read the title    |
| 10 | at the top of this slide for the record. It starts     |
| 11 | with "adequate supply."                                |
| 12 | A. "Adequate supply this summer and the                |
| 13 | resulting prices do not reflect the continued risks    |
| 14 | posed by the portfolio transition."                    |
| 15 | Q. And then if you would move that page down           |
| 16 | just a little bit, there is a green highlighted        |
| 17 | portion there at the bottom. Mr. Munoz, would you      |
| 18 | please read that sentence in the green box that starts |
| 19 | with "urgent reforms."                                 |
| 20 | A. "Urgent reforms to MISO's resource adequacy         |
| 21 | and market design are necessary to ensure continued    |
| 22 | reliability."  |
| 23 | Q. Thank you. Switching back to your                   |
| 24 | cross-rebuttal testimony                               |
| 25 | A. Which, by the way, I think that's literally         |
|    |  |

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| 1  | what MISO has been doing for a little bit, is that    |
|----|---|
| 2  | their ask is ongoing.                                 |
| 3  | You have changes in the resource adequacy             |
| 4  | in the verification process when doing a seasonal     |
| 5  | construct and moving away from probabilistic and      |
| 6  | deterministic is part of the planning requirement.    |
| 7  | Q. Can you pull up the cross-rebuttal                 |
| 8  | testimony at page 7, please. Oh, you are there.       |
| 9  | Line 5.   |
| 10 | Mr. Munoz, you discuss here IPL's current             |
| 11 | approved methodology for computing the interruptible  |
| 12 | rate, and you then use the 2023-24 PRA results to     |
| 13 | calculate a credit amount; correct?                   |
| 14 | A. Yes.   |
| 15 | Q. And you're applying that calculation for           |
| 16 | all five years of the EEP; correct?                   |
| 17 | A. That's right.                                      |
| 18 | Q. In the last EEP proceeding, though, the            |
| 19 | Board actually approved a five-year forecast in IPL's |
| 20 | <pre>last EEP proceeding; correct?</pre>              |
| 21 | A. You mean the short-term 15 percent of using        |
| 22 | Wood Mac Resource Capacity Option?                    |
| 23 | Q. The forecast, yes.                                 |
| 24 | A. Yes, that's right.                                 |
| 25 | Q. And then going one more page down to page          |
| 1  |   |

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| 1  | 8, there's a table there. It shows the calculation      |
|----|---|
| 2  | applying the new PRA value using IPL's currently        |
| 3  | approved methodology.                                   |
| 4  | It indicates a rate per month at the bottom             |
| 5  | there in bold at \$6.92 per kilowatt per month; is that |
| 6  | correct?  |
| 7  | A. That's right.  |
| 8  | Q. And that would be an increase from the               |
| 9  | current credit amount, yes?                             |
| 10 | A. That's correct.                                      |
| 11 | Q. So you do agree the rate should be                   |
| 12 | increased?  |
| 13 | A. Assuming the data that was computed the              |
| 14 | methodology remains and there's a 15 weight of          |
| 15 | short-term and a 95 weight of long-term, correct,       |
| 16 | there will be an increase.                              |
| 17 | We're updating the value of the CONE value,             |
| 18 | and I don't take a lot of issue with the updated CONE   |
| 19 | value, using the more current 2022 CONE value.          |
| 20 | MS. HERNDON: Thank you. Those are all my                |
| 21 | questions.  |
| 22 | THE WITNESS: Thank you.                                 |
| 23 | PRESIDING OFFICER WRIGHT: Mr. Mandelbaum.               |
| 24 | MR. MANDELBAUM: No questions.                           |
| 25 | PRESIDING OFFICER WRIGHT: I believe you                 |
| 1  |   |

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| 1  | testified with regard to IPL's Proposed Behavioral     |
|----|--|
| 2  | Demand Response Program?                               |
| 3  | THE WITNESS: Yes, sir.                                 |
| 4  | PRESIDING OFFICER WRIGHT: So if IPL does               |
| 5  | not make changes to the incentive for the Behavioral   |
| 6  | Demand Response Program, do you believe that the       |
| 7  | program should be eliminated from the plan or offered  |
| 8  | to see if there is customer interest?                  |
| 9  | THE WITNESS: Well, my preference would be              |
| 10 | an increase of it.                                     |
| 11 | In light of your question, Your Honor,                 |
| 12 | would it be eliminated if we don't get a bit of a      |
| 13 | higher incentive? Obviously, the answer to that would  |
| 14 | be no, but we will prepare a higher incentive because  |
| 15 | we do think our Behavioral Demand Response Program     |
| 16 | that the design is intended to shift usage to          |
| 17 | off-peak periods. It requires a nudge of a             |
| 18 | well-tailored incentive.                               |
| 19 | There's a different example that we                    |
| 20 | provided that I provided in my testimony that tries    |
| 21 | to address a little bit of how those critical pricings |
| 22 | for residential should be modeled, and I think that,   |
| 23 | you know, an incentive, a bit of a higher incentive    |
| 24 | will probably be a better fit for that program, but I  |
| 25 | wouldn't recommend an elimination of the program if    |
| 1  |  |

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| 1  | that is not increased.                                 |
|----|--|
| 2  | That would not be my preference, but it                |
| 3  | will be preferable that there's some degree of higher  |
| 4  | incentive so we can really get the results that I feel |
| 5  | this is trying to target and perhaps increase it as    |
| 6  | the AOP had identified there's opportunities and       |
| 7  | potential in critical rate pricing for that program.   |
| 8  | PRESIDING OFFICER WRIGHT: So going back to             |
| 9  | the nonresidential interruptible, do they have the     |
| 10 | same demand and have the same credit each month rather |
| 11 | than varying it for summer and non-summer months?      |
| 12 | THE WITNESS: My position is OCA's                      |
| 13 | position is that we do welcome a seasonal credit       |
| 14 | construct. I think compensation of demand when demand  |
| 15 | is most needed is logical.                             |
| 16 | I don't agree with an increase. You know,              |
| 17 | simply one of the considerations is that it exhausts   |
| 18 | the budgets.   |
| 19 | We've been discussing things like you                  |
| 20 | know, an example is, you know, the amount of customers |
| 21 | that I feel we have in this service territory, a lot   |
| 22 | of people are employed by the same interruptible       |
| 23 | customers that participate in that program, some       |
| 24 | don't.   |
| 25 | But incentive to ensure adequacy rate                  |

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| 1  | mitigation for those customers, I think, are you       |
|----|--|
| 2  | know, will be the need. I think increasing the         |
| 3  | incentive creates that additional burden in the EECR   |
| 4  | and the ERCR for those customers, specifically those   |
| 5  | customers that are low-income customers.               |
| 6  | PRESIDING OFFICER WRIGHT: Okay. So have                |
| 7  | you or OCA calculated the cost-effectiveness and       |
| 8  | budget impacts of the proposed incentive for the       |
| 9  | nonresidential and interruptible program that you're   |
| 10 | proposing?   |
| 11 | THE WITNESS: No, I have not emulated or                |
| 12 | produced any cost estimate of that different           |
| 13 | threshold. I mean, it could be a pretty                |
| 14 | straightforward calculation.                           |
| 15 | You know, there will be considerations, you            |
| 16 | know, subject to this agreement about what component   |
| 17 | will be in the avoided cost number. Some parties have  |
| 18 | different disagreements of what should be included and |
| 19 | what should not be included, but I think it could be a |
| 20 | very helpful calculation.                              |
| 21 | I'd be happy to provide that, if you so                |
| 22 | wish.  |
| 23 | PRESIDING OFFICER WRIGHT: That's all I                 |
| 24 | have.  |
| 25 | Any questions, Mr. Sowden, after my                    |
|    |  |

IN RE: INTERSTATE POWER AND LIGHT COMPANY HEARING 06/08/2023

| 1  | questions?   |
|----|--|
| 2  | MR. SOWDEN: No questions, Your Honor.                  |
| 3  | PRESIDING OFFICER WRIGHT: Ms. Van Loon?                |
| 4  | MS. VAN LOON: No, Your Honor.                          |
| 5  | PRESIDING OFFICER WRIGHT: Ms. Herndon?                 |
| 6  | MS. HERNDON: No, Your Honor.                           |
| 7  | PRESIDING OFFICER WRIGHT: Mr. Mandelbaum?              |
| 8  | MR. MANDELBAUM: No questions.                          |
| 9  | PRESIDING OFFICER WRIGHT: Redirect.                    |
| 10 | MS. EASLER: Thank you.                                 |
| 11 | REDIRECT EXAMINATION                                   |
| 12 | BY MS. JOHNSON:  |
| 13 | Q. Mr. Munoz, I would like to direct your              |
| 14 | attention to Slide 5 in IBEC's Hearing Exhibit 1.      |
| 15 | Could you read the title of that slide?                |
| 16 | A. "North/Central region demonstrated adequate         |
| 17 | supply driven by a combination of lower demand, new    |
| 18 | generation, delayed retirements, additional imports    |
| 19 | and higher accreditation."                             |
| 20 | Q. And in what region is IPL located?                  |
| 21 | A. It's in the North Region, Zone 3.                   |
| 22 | Q. For interruptions that are called for,              |
| 23 | Option 2 or 3 interruptions, which are not reliability |
| 24 | interruptions, does the interruptible customer have    |
| 25 | the option of choosing to buy through that event?      |

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| 1  | A. They do.   |
|----|---|
| 2  | Q. And would that customer be subject to a            |
| 3  | penalty in that situation?                            |
| 4  | A. Not necessarily.                                   |
| 5  | Q. Okay. Why do you think a short-term                |
| 6  | capacity value continues to be appropriate?           |
| 7  | A. The reason is because the interruptible            |
| 8  | program is a by design, it was a three-year term,     |
| 9  | and now it's a five-year term.                        |
| 10 | So it's still There needs to be a                     |
| 11 | consideration of the immediate current value capacity |
| 12 | because it is not necessarily a long-term resource.   |
| 13 | Customers can move in and out of the program and      |
| 14 | participate or choose not to participate in the       |
| 15 | program, and that could happen at any point that they |
| 16 | can.  |
| 17 | I mean, there's some requirements or                  |
| 18 | restrictions, but it is essentially not a 30- or      |
| 19 | 40-year-long commitment like a peaking resource. So   |
| 20 | it's more of a short-term resource.                   |
| 21 | Q. All right. Given that Iowa now has a               |
| 22 | 2 percent of retail sales CAP on the Demand Response  |
| 23 | Program, does the proposed increase and the           |
| 24 | interruptible credit potentially limit the amount of  |
| 25 | spending on Residential Demand Response Programs?     |
| 25 | spending on Residential Demand Response Programs?     |

IN RE: INTERSTATE POWER AND LIGHT COMPANY HEARING 06/08/2023

| 1  | A. I wouldn't say it limits it. I would say            |
|----|--|
| 2  | it exhausts it.  |
| 3  | There's no reliability for additional                  |
| 4  | spending because all the spending went to the increase |
| 5  | in the curtail credit. It will go beyond its limits.   |
| 6  | It exhausts all that budget for any other              |
| 7  | consideration of any other program.                    |
| 8  | MS. EASLER: Thank you. That's all I have.              |
| 9  | PRESIDING OFFICER WRIGHT: You may step                 |
| 10 | down.  |
| 11 | THE WITNESS: Thank you.                                |
| 12 | PRESIDING OFFICER WRIGHT: Call your next               |
| 13 | witness.   |
| 14 | MS. JOHNSON: OCA calls Tim Tessier.                    |
| 15 | TIM TESSIER,   |
| 16 | called as a witness by the Office of Consumer          |
| 17 | Advocate, being first duly sworn by Presiding Officer  |
| 18 | Wright, was examined and testified as follows:         |
| 19 | PRESIDING OFFICER WRIGHT: Have a seat.                 |
| 20 | DIRECT EXAMINATION                                     |
| 21 | BY MS. JOHNSON:  |
| 22 | Q. Will you please state your name and                 |
| 23 | position for the record.                               |
| 24 | A. Tim Tessier, last name T-e-s-s-i-e-r. I'm           |
| 25 | a utilities specialist at the Office of Consumer       |

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| 1  | Advocate.  |
|----|--|
| 2  | Q. Are you the same Tim Tessier who prepared     |
| 3  | direct and rebuttal testimony in this docket and |
| 4  | associated exhibits?                             |
| 5  | A. I am.   |
| 6  | Q. Do you have any changes you need to make to   |
| 7  | any of those documents?                          |
| 8  | A. I do not.                                     |
| 9  | MS. EASLER: Since your testimony and             |
| 10 | exhibits have been entered into the record by    |
| 11 | stipulation, I tender Mr. Tessier for            |
| 12 | cross-examination.                               |
| 13 | PRESIDING OFFICER WRIGHT: IPL.                   |
| 14 | MR. SOWDEN: IPL has no questions of this         |
| 15 | witness.   |
| 16 | PRESIDING OFFICER WRIGHT? Ms. Van Loon?          |
| 17 | MS. VAN LOON: No questions, Your Honor.          |
| 18 | PRESIDING OFFICER WRIGHT: Ms. Herndon?           |
| 19 | MS. HERNDON: No questions, Your Honor.           |
| 20 | PRESIDING OFFICER WRIGHT: Mr. Mandelbaum?        |
| 21 | MR. MANDELBAUM: No questions, Your Honor.        |
| 22 | PRESIDING OFFICER WRIGHT: Let me just            |
| 23 | check my cheat sheet.                            |
| 24 | (Brief pause.)                                   |
| 25 | PRESIDING OFFICER WRIGHT: I don't believe        |

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|    | <u> </u>   |
|----|--|
| 1  | I have any questions either. Thank you. You may step   |
| 2  | down.  |
| 3  | THE WITNESS: Thank you.                                |
| 4  | PRESIDING OFFICER WRIGHT: Does that                    |
| 5  | complete your presentation of your testimony?          |
| 6  | MS. JOHNSON: Yes. The OCA has no                       |
| 7  | additional witnesses.                                  |
| 8  | PRESIDING OFFICER WRIGHT: So then we'll go             |
| 9  | to LEG. Ms. Van Loon.                                  |
| 10 | MS. VAN LOON: Thank you, Your Honor. LEG               |
| 11 | calls David Vognsen.                                   |
| 12 | DAVID VOGNSEN,   |
| 13 | called as a witness by the Large Energy Group, being   |
| 14 | first duly sworn by Presiding Officer Wright, was      |
| 15 | examined and testified as follows:                     |
| 16 | DIRECT EXAMINATION                                     |
| 17 | BY MS. VAN LOON:                                       |
| 18 | Q. Mr. Vognsen, can you provide your name and          |
| 19 | position for the record, please?                       |
| 20 | A. Yeah. My name is David Vognsen, V, as in            |
| 21 | Victor, o-g-n-s-e-n. I'm vice president of rates and   |
| 22 | regulatory for Latham, Ervin, Vognsen & Associates.    |
| 23 | Q. Thank you. Did you cause to be filed                |
| 24 | direct rebuttal and surrebuttal testimony and exhibits |
| 25 | in this docket?  |
|    |  |

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| 1  | A. Yes, I did.                                       |
|----|--|
| 2  | Q. Do you have any changes or corrections to         |
| 3  | that testimony and exhibits?                         |
| 4  | A. No, I do not.                                     |
| 5  | MS. VAN LOON: LEG hereby tenders                     |
| 6  | Mr. Vognsen for cross-examination.                   |
| 7  | PRESIDING OFFICER WRIGHT: IPL?                       |
| 8  | MR. SOWDEN: IPL has no questions for this            |
| 9  | witness.   |
| 10 | PRESIDING OFFICER WRIGHT: OCA?                       |
| 11 | MS. EASLER: No questions.                            |
| 12 | PRESIDING OFFICER WRIGHT: Ms. Herndon?               |
| 13 | MS. HERNDON: No questions.                           |
| 14 | PRESIDING OFFICER WRIGHT: Mr. Mandelbaum?            |
| 15 | MR. MANDELBAUM: No questions.                        |
| 16 | PRESIDING OFFICER WRIGHT: You heard my               |
| 17 | question about transmission costs being included in  |
| 18 | the avoided costs?                                   |
| 19 | THE WITNESS: Yes, I did.                             |
| 20 | PRESIDING OFFICER WRIGHT: Do you think               |
| 21 | transmission costs should be included in the avoided |
| 22 | cost calculation or not?                             |
| 23 | THE WITNESS: I think currently they should           |
| 24 | not be.  |
| 25 | PRESIDING OFFICER WRIGHT: And why is that?           |

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| THE WITNESS: Based on the changes we've                |
|--|
| seen in the transmission costs, especially since the   |
| rapid rate in raise for transmission being provided by |
| ITC, their increase in their revenue requirement we've |
| seen, especially over the last five years, and         |
| essentially we're not seeing any kind of increase in   |
| their load.  |
| So when you look at why are they                       |
| increasing, you know, their revenue requirement, you   |
| know, they're doing it for other reasons, and they're  |
| not taking into account either demand response or      |
| energy efficiency.                                     |
| PRESIDING OFFICER WRIGHT: Okay. And do                 |
| you support IPL's revised interruptible credits?       |
| THE WITNESS: I support basing it off of                |
| CONE, but I take a different approach as far as how I  |
| would calculate the actual rates that would end up in  |
| the tariff.  |
| PRESIDING OFFICER WRIGHT: And what's that              |
| difference?  |
| THE WITNESS: The difference is I look at               |
| what they would expect to have from interruptible      |
| customers, as far as the interruptible capacity that   |
| they would provide, and I would still apply a ratio of |
| kind of the what they call the noncoincidence peak     |
|  |

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| -  |  |
|----|--|
| 1  | or their billing demand lists, their interruptible     |
| 2  | firm contract demands.                                 |
| 3  | Look at the ratio of that to be actual                 |
| 4  | interruptible capacity they're applying, and then just |
| 5  | apply that to the CONE rate and spread that by the     |
| 6  | season.  |
| 7  | PRESIDING OFFICER WRIGHT: Is that                      |
| 8  | calculation or explanation in your testimony?          |
| 9  | THE WITNESS: I have that calculation in my             |
| 10 | testimony, yes.  |
| 11 | PRESIDING OFFICER WRIGHT: Okay. I believe              |
| 12 | that's all the questions I have.                       |
| 13 | Redirect?  |
| 14 | MS. VAN LOON: No redirect, Your Honor.                 |
| 15 | PRESIDING OFFICER WRIGHT: Okay. Thank                  |
| 16 | you. You may step down.                                |
| 17 | I believe that's your only witness; is that            |
| 18 | correct?   |
| 19 | MS. VAN LOON: That's correct, Your Honor.              |
| 20 | PRESIDING OFFICER WRIGHT: Ms. Herndon?                 |
| 21 | MS. HERNDON: Thank you, Your Honor. IBEC               |
| 22 | calls Robert Stephens.                                 |
| 23 |  |
| 24 |  |
| 25 |  |
|    |  |

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| 1  | ROBERT STEPHENS,                                       |
|----|--|
| 2  | called as a witness by the Iowa Business Energy        |
| 3  | Coalition, being first duly sworn by Presiding Officer |
| 4  | Wright, was examined and testified as follows:         |
| 5  | PRESIDING OFFICER WRIGHT: Have a seat.                 |
| 6  | You may proceed.                                       |
| 7  | DIRECT EXAMINATION                                     |
| 8  | BY MS. HERNDON:  |
| 9  | Q. Mr. Stephens, would you please state your           |
| 10 | name and employer for the record.                      |
| 11 | A. Robert Stephens, Brubaker & Associates              |
| 12 | Incorporated.  |
| 13 | Q. What is your position at Brubaker &                 |
| 14 | Associates?  |
| 15 | A. I'm a principal.                                    |
| 16 | Q. Did you cause to be filed in this                   |
| 17 | proceeding direct, cross-rebuttal, rebuttal and        |
| 18 | surrebuttal testimony?                                 |
| 19 | A. Yes.  |
| 20 | Q. Do you have any corrections or changes to           |
| 21 | your prefiled testimony?                               |
| 22 | A. No.   |
| 23 | Q. Have you reviewed the cross-rebuttal                |
| 24 | testimony of OCA Witness Munoz?                        |
| 25 | A. I have.   |

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| 1  | Q. I understand you'd like to respond to that;         |
|----|--|
| 2  | is that correct?                                       |
| 3  | A. Yes.  |
| 4  | Q. If we could pull that up at page 3.                 |
| 5  | PRESIDING OFFICER WRIGHT: You want the                 |
| 6  | Munoz cross-rebuttal?                                  |
| 7  | MS. HERNDON: The Munoz cross-rebuttal,                 |
| 8  | please.  |
| 9  | PRESIDING OFFICER WRIGHT: All right.                   |
| 10 | BY MS. HERNDON:  |
| 11 | Q. At lines 11 through 13, Mr. Munoz states,           |
| 12 | "It's practically impossible to know the economic cost |
| 13 | function for each individual participating customer    |
| 14 | and to design an interruptible credit on that basis."  |
| 15 | How do you respond to that, Mr. Stephens?              |
| 16 | A. I agree in part. It's impossible to know            |
| 17 | the individual customer's economic decisions.          |
| 18 | They'll have to take into account their own            |
| 19 | individual costs of interruption, the kind of items    |
| 20 | you were asking Mr. Munoz about: Loss of production,   |
| 21 | equipment damage, training costs, et cetera, and weigh |
| 22 | those several different costs against the incentive    |
| 23 | levels, the benefit versus the cost.                   |
| 24 | They also need to take into account their              |
| 25 | expectation of the frequency of interruptions going    |
| 1  |  |

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| 1  | forward.   |
|----|--|
| 2  | Q. Further down at line 15 on page 3,                  |
| 3  | Mr. Munoz states that, "The most rational economic     |
| 4  | decision for interruptible program participants is to  |
| 5  | maximize the interruptible credit incentive as much as |
| 6  | is allowed within the plan's budget."                  |
| 7  | How do you respond to that?                            |
| 8  | A. My first response would be that no one has          |
| 9  | proposed anything that comes anywhere near maximizing  |
| 10 | the credit.  |
| 11 | As I indicated in my testimony, the program            |
| 12 | is worth approximately \$198 per kW year. IPL's        |
| 13 | proposal in their rebuttal testimony is a credit based |
| 14 | on \$98 per year or somewhat less than half.           |
| 15 | So my first response is no one is offering             |
| 16 | anything here maximizing the credit, but my second     |
| 17 | response is the converse would be true as well.        |
| 18 | I suppose nonparticipating customers would             |
| 19 | like to minimize the incident of levels. They would    |
| 20 | like to get the benefit of interruptible capacity and  |
| 21 | the lowering of costs of acquiring new generation at a |
| 22 | cheap rate, so there is attention there.               |
| 23 | Yes, interruptible customers would like                |
| 24 | larger incentives, but Mr. Munoz should acknowledge    |
| 25 | that nonparticipating customers would like to have as  |
|    |  |

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| 1  | low of incentives as possible.                         |
|----|--|
| 2  | Then finally I think it's really in a                  |
| 3  | nonparticipant's economic interests to ensure that the |
| 4  | value of the interruptible program is not lost, and    |
| 5  | that value will be lost, in my opinion, to some degree |
| 6  | if the incentives are too low.                         |
| 7  | Q. If you would go to page 5 now, lines 1              |
| 8  | through 5. Mr. Munoz states that, "Changes in          |
| 9  | contractual demand and achieved demand savings is      |
| 10 | likely more related to operational limits of the type  |
| 11 | of load characteristics that exist in IPL's system     |
| 12 | rather than the level of credit."                      |
| 13 | What is your response?                                 |
| 14 | A. While I agree there's some physical limit,          |
| 15 | there's only a certain number of customers that can be |
| 16 | interrupted and only can be interrupted to a certain   |
| 17 | degree.  |
| 18 | I don't believe that that potential has                |
| 19 | been reached, and I would point out that the           |
| 20 | Assessment of Potential, which you were asking         |
| 21 | Mr. Munoz about, indicates that there's, in the high   |
| 22 | scenario, another 100 megawatts.                       |
| 23 | So consequently, while there's a physical              |
| 24 | limit, it's not particularly helpful.                  |
| 25 | Q. Further down on page 5 at line 17 and               |
|    |  |

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| 1  | continuing onto page 6, line 9, Mr. Munoz suggests     |
|----|--|
|    |  |
| 2  | that, "If the reduction in participation does not      |
| 3  | match exactly or exceed the ratio of change program    |
| 4  | benefits that that somehow suggests there is no        |
| 5  | elasticity."   |
| 6  | How would you respond to that,                         |
| 7  | Mr. Stephens?  |
| 8  | A. If I understand Mr. Munoz's position, it is         |
| 9  | that if the ratio of change in participation and the   |
| 10 | ratio of change in the incentive are not one or        |
| 11 | greater, then it's inelastic. I would assume that      |
| 12 | instead of 1.00 and 0.99, Mr. Munoz would say it's not |
| 13 | elastic.   |
| 14 | That's not a reasonable assumption. There              |
| 15 | are ranges of elasticity.                              |
| 16 | The fact is if the incentive went down to              |
| 17 | zero, customers would drop out. If it was cut in       |
| 18 | half, some customers would drop out. If it was         |
| 19 | tripled, there would be more interruptible loads.      |
| 20 | Clearly there's some elasticity there.                 |
| 21 | It's not inelastic.                                    |
| 22 | I'd like to comment on the theory behind               |
| 23 | Mr. Munoz's position about economic elasticity in      |
| 24 | general. It has to do with customers being able to     |
| 25 | make choices to buy or in this case participate. That  |
|    |  |

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| 1  | can be done on a near instantaneous basis coinciding   |
|----|--|
| 2  | with the change in price or incentive.                 |
| 3  | That simply isn't the case here. We have               |
| 4  | three-year contracts that can't be done on an          |
| 5  | immediate basis. So his analysis is based on a faulty  |
| 6  | assumption.  |
| 7  | Q. Also at page 6, lines 6 through 8, you              |
| 8  | stated that, "The logic of Mr. Munoz's ratio of change |
| 9  | results reinforces his point that program              |
| 10 | participation and available contractual demand has to  |
| 11 | do with other operating considerations not exclusively |
| 12 | germane to the credit incentive rate."                 |
| 13 | How do you respond?                                    |
| 14 | A. I agree in part. Those other operating              |
| 15 | considerations don't well, they're the things we       |
| 16 | talked about before, the various costs of              |
| 17 | interruption.  |
| 18 | However, what the Board is doing here and              |
| 19 | what I feel is proposed is to set the incentive level. |
| 20 | The incentive level itself doesn't affect the          |
| 21 | perceived loss to customers.                           |
| 22 | In other words, it will cost them X                    |
| 23 | thousands of dollars to shut down for two hours        |
| 24 | whether or not the incentive rate is high or low;      |
| 25 | however, the other component I mentioned, which is     |
|    |  |

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|    | -  |
|----|--|
| 1  | frequency of interruptions, if the incentive is not    |
| 2  | adequate and customers drop out of this program, then  |
| 3  | the frequency of interruptions is likely to increase   |
| 4  | because that means there's more firm demand that IPL   |
| 5  | will have to meet with its limited resources.          |
| 6  | And consequently, to the extent reserve                |
| 7  | margins have tight, there could be more frequent       |
| 8  | interruptions, and then that changes the economics of  |
| 9  | the remaining customers. And it could be a death       |
| 10 | spiral if customers drop out too quickly or if they    |
| 11 | drop out and the perceived frequency of interruptions  |
| 12 | goes up.   |
| 13 | Q. At pages 6 and 7, Mr. Munoz provides the            |
| 14 | results from the MISO 2023-24 Planning Resource        |
| 15 | Auction Results indicating much lower values than      |
| 16 | present in the prior year's PRA results.               |
| 17 | What is your response to that?                         |
| 18 | A. I know we already covered the fact that the         |
| 19 | current credits were based on not a single year of PRA |
| 20 | results but a forecast of PRA results. I won't really  |
| 21 | get into that.   |
| 22 | I would point out that the current PRA is              |
| 23 | for the period June 2023 through May of 2024, so that  |
| 24 | represents five months within the five-year planning   |
| 25 | period at issue here. If I'm understanding this        |
|    |  |

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| 1  | right, he would base the incentive for 60 months on a |
|----|---|
| 2  | PRA that's applicable less than 10 percent of the     |
| 3  | time.   |
| 4  | Q. Did MISO give any indication that the              |
| 5  | 2023-2024 PRA results would be indicative of future   |
| 6  | years in the energy efficiency period?                |
| 7  | A. Yes, that's the way I interpreted the              |
| 8  | statements that you had Mr. Munoz read into the       |
| 9  | record.   |
| 10 | MISO, while they acknowledge that there's             |
| 11 | adequate capacity for this planning year, June '23 to |
| 12 | May '24, I interpret it to mean they have severe      |
| 13 | concerns about future years absent significant        |
| 14 | changes, and that reliability could very well be      |
| 15 | impacted.   |
| 16 | Q. And then lastly, at pages 7 through 8,             |
| 17 | Mr. Munoz calculates a revised interruptible credit   |
| 18 | level based on the '23-24 PRA results and             |
| 19 | characterizes them being based on IPL's current       |
| 20 | methodology for computing the interruptible credit in |
| 21 | Docket EEP-2018-0003.                                 |
| 22 | How do you respond?                                   |
| 23 | A. My response is how I alluded before. It's          |
| 24 | not the currently approved methodology because the    |
| 25 | currently approved methodology used forecasts of      |
|    |   |

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| 1  | future PRA results, not actual PRA results.          |
|----|--|
| 2  | Q. Thank you.  |
| 3  | MS. HERNDON: With Mr. Stephens' prefiled             |
| 4  | testimony having been admitted and this additional   |
| 5  | testimony, I would tender the witness for questions. |
| 6  | PRESIDING OFFICER WRIGHT: IPL?                       |
| 7  | MR. SOWDEN: IPL has no questions for this            |
| 8  | witness.   |
| 9  | PRESIDING OFFICER WRIGHT: OCA?                       |
| 10 | MS. JOHNSON: No questions.                           |
| 11 | PRESIDING OFFICER WRIGHT: Ms. Van Loon?              |
| 12 | MS. VAN LOON: No questions, Your Honor.              |
| 13 | PRESIDING OFFICER WRIGHT: Mr. Mandelbaum?            |
| 14 | MR. MANDELBAUM: No questions, Your Honor.            |
| 15 | PRESIDING OFFICER WRIGHT: Okay. You may              |
| 16 | step down.   |
| 17 | THE WITNESS: Thank you, Your Honor.                  |
| 18 | PRESIDING OFFICER WRIGHT: So I think that            |
| 19 | completes your testimony; correct?                   |
| 20 | MS. HERNDON: Yes, it does. Thank you,                |
| 21 | Your Honor.  |
| 22 | PRESIDING OFFICER WRIGHT: I think we're              |
| 23 | ready, then, for your testimony, Mr. Martin-Schramm. |
| 24 |  |
| 25 |  |
|    |  |

IN RE: INTERSTATE POWER AND LIGHT COMPANY HEARING 06/08/2023

| 1  | JAMES MARTIN-SCHRAMM,                                  |
|----|--|
| 2  | called as a witness by Clean Energy Districts of Iowa, |
| 3  | being first duly sworn by Presiding Officer Wright,    |
| 4  | was examined and testified as follows:                 |
| 5  | PRESIDING OFFICER WRIGHT: Have a seat.                 |
| 6  | Since you aren't represented by counsel or anyone      |
| 7  | else, we're going to do this a little differently.     |
| 8  | Can you state your name for the record?                |
| 9  | THE WITNESS: James Martin-Schramm,                     |
| 10 | M-a-r-t-i-n, hyphen, S-c-h-r-a-m-m.                    |
| 11 | PRESIDING OFFICER WRIGHT: Who are you                  |
| 12 | employed by?   |
| 13 | THE WITNESS: The Clean Energy Districts of             |
| 14 | Iowa.  |
| 15 | PRESIDING OFFICER WRIGHT: So when you say              |
| 16 | you're employed by them, are you actually employed?    |
| 17 | Are you on the payroll?                                |
| 18 | THE WITNESS: I'm a consultant paid on an               |
| 19 | hourly basis.  |
| 20 | PRESIDING OFFICER WRIGHT: Okay. Are you                |
| 21 | the same Mr. Martin-Schramm that prefiled testimony in |
| 22 | this docket?   |
| 23 | THE WITNESS: Yes, I am.                                |
| 24 | PRESIDING OFFICER WRIGHT: Do you have any              |
| 25 | changes to that testimony?                             |
|    |  |

IN RE: INTERSTATE POWER AND LIGHT COMPANY HEARING 06/08/2023

| 1  | THE WITNESS: No. I made some corrections            |
|----|---|
| 2  | to incorrect assumptions in my rebuttal and         |
| 3  | surrebuttal testimony.                              |
| 4  | PRESIDING OFFICER WRIGHT: So since                  |
| 5  | Mr. Martin-Schramm's testimony has already been     |
| 6  | admitted, we'll begin cross-examination.            |
| 7  | IPL?  |
| 8  | MR. SOWDEN: IPL has no questions.                   |
| 9  | PRESIDING OFFICER WRIGHT: OCA?                      |
| 10 | MS. JOHNSON: No questions.                          |
| 11 | PRESIDING OFFICER WRIGHT: Ms. Van Loon?             |
| 12 | MS. VAN LOON: No questions.                         |
| 13 | PRESIDING OFFICER WRIGHT: I apologize.              |
| 14 | Calling you "LEG" just seems odd to me.             |
| 15 | Ms. Herndon?  |
| 16 | MS. HERNDON: I have no questions, Your              |
| 17 | Honor.  |
| 18 | PRESIDING OFFICER WRIGHT: Mr. Mandelbaum?           |
| 19 | MR. MANDELBAUM: No questions.                       |
| 20 | PRESIDING OFFICER WRIGHT: Okay. So let me           |
| 21 | check and see if I've got some questions here.      |
| 22 | So, Mr. Martin-Schramm, did you calculate           |
| 23 | the cost-effectiveness and budget impacts of any of |
| 24 | the proposals that you made in this docket?         |
| 25 | THE WITNESS: Not in my testimony, I did             |

## IN RE: INTERSTATE POWER AND LIGHT COMPANY HEARING 06/08/2023

| 1  | not. I have a bunch of back-of-the-envelope           |
|----|---|
| 2  | scribbling here, but no, that's not my strong suit.   |
| 3  | PRESIDING OFFICER WRIGHT: So I know                   |
| 4  | there's been some testimony regarding a time where we |
| 5  | used a pilot, and I guess the question is: Do you     |
| 6  | believe that the pilot would be effective without the |
| 7  | addition of battery storage facilities?               |
| 8  | THE WITNESS: Can you repeat that question?            |
| 9  | PRESIDING OFFICER WRIGHT: Do you believe              |
| 10 | that a time-of-use pilot would be effective without   |
| 11 | the addition of battery storage facilities? If you    |
| 12 | don't have an answer                                  |
| 13 | THE WITNESS: It's not something I                     |
| 14 | commented on extensively. I don't have a firm         |
| 15 | opinion.  |
| 16 | PRESIDING OFFICER WRIGHT: Okay.                       |
| 17 | THE WITNESS: Your Honor, may I return to              |
| 18 | your first question and add a little more there?      |
| 19 | PRESIDING OFFICER WRIGHT: Okay.                       |
| 20 | THE WITNESS: One reason I didn't calculate            |
| 21 | the cost-effectiveness, for example, multiplying      |
| 22 | tenfold alliance investment and heat pump hot water   |
| 23 | heaters or donating blocks in their community solar   |
| 24 | program is because those ideas are part of their      |
| 25 | qualified income program. As I understand it, those   |

IN RE: INTERSTATE POWER AND LIGHT COMPANY HEARING 06/08/2023

| 1  | investments don't have to go through a                 |
|----|--|
| 2  | cost-effectiveness test.                               |
| 3  | So, you know, I have some numbers, but I               |
| 4  | admit they're pretty hastily pulled together because I |
| 5  | was afraid you'd ask that question.                    |
| 6  | PRESIDING OFFICER WRIGHT: They're not                  |
| 7  | part   |
| 8  | THE WITNESS: They're not part of my                    |
| 9  | testimony, I'm afraid. I'll probably add in            |
| 10 | post-hearing comments, if that's acceptable.           |
| 11 | PRESIDING OFFICER WRIGHT: I don't believe              |
| 12 | I have any other questions. The only redirect you      |
| 13 | would get is from me, and I've asked my questions. So  |
| 14 | you may step down.                                     |
| 15 | THE WITNESS: Thank you.                                |
| 16 | PRESIDING OFFICER WRIGHT: So I believe                 |
| 17 | that's all of the witnesses. Is there any other        |
| 18 | evidence or any other matters that we need to address  |
| 19 | except for briefing and We need to go into             |
| 20 | confidential.  |
| 21 | So even after all this, you still need a               |
| 22 | confidential session?                                  |
| 23 | MS. VAN LOON: I don't know how else to get             |
| 24 | in an exhibit that contains confidential information.  |
| 25 | PRESIDING OFFICER WRIGHT: Okay. So we are              |

IN RE: INTERSTATE POWER AND LIGHT COMPANY HEARING 06/08/2023

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| 1  | going to go into confidential session.                 |
|----|--|
| 2  | Do you have an approximate length of how               |
| 3  | long you think we'll be.                               |
| 4  | MS. VAN LOON: Short, and I actually really             |
| 5  | mean that.   |
| 6  | PRESIDING OFFICER WRIGHT: Okay. So                     |
| 7  | because we're going to go into confidential session to |
| 8  | address some confidential information, I'm going to    |
| 9  | have to ask everyone who is in the room who is not     |
| 10 | subject to a nondisclosure agreement to leave. I       |
| 11 | think probably it won't take longer than 15 minutes.   |
| 12 | I will tell you when we come back all we'll            |
| 13 | be doing is setting a briefing schedule and taking     |
| 14 | care of any other administrative matters. We will not  |
| 15 | be addressing any other evidence, from my              |
| 16 | understanding. Is that correct?                        |
| 17 | All we're doing is wrapping up and taking              |
| 18 | care of the administrative part of this, so you can    |
| 19 | leave. I will let Mr. Sowden decide who can stay and   |
| 20 | leave.   |
| 21 | You can come back in 15 minutes, if you                |
| 22 | want to see how it is in public session and how we     |
| 23 | wrap it up.  |
| 24 | (Pages 191 through 197 are contained in the            |
| 25 | confidential portion of the transcript.)               |
|    |  |

# IN RE: INTERSTATE POWER AND LIGHT COMPANY HEARING 06/08/2023

| 1  | PRESIDING OFFICER WRIGHT: Just so you know             |
|----|--|
| 2  | when you hear this from the outside, I'm going to take |
| 3  | credit for this not going as long as we thought it was |
| 4  | going to. So even though I appreciate your efforts,    |
| 5  | it's really your hearing and you're the ones to decide |
| 6  | that, I'm going to take credit.                        |
| 7  | Well, my records show that all of the                  |
| 8  | hearing exhibits have been admitted. Does anyone       |
| 9  | disagree?  |
| 10 | Staff, is that correct?                                |
| 11 | MR. BAKER: Your records are consistent                 |
| 12 | with mine.   |
| 13 | PRESIDING OFFICER WRIGHT: Okay. So when I              |
| 14 | talked to the court reporter, she said she would have  |
| 15 | a transcript, I think, in maybe 14 days. It was a      |
| 16 | little shorter than we thought, so maybe sooner than   |
| 17 | that.  |
| 18 | Do the parties want to file briefs? IPL?               |
| 19 | MR. SOWDEN: Interstate Power and Light                 |
| 20 | Company would like to file a brief 14 days after the   |
| 21 | transcript is filed.                                   |
| 22 | PRESIDING OFFICER WRIGHT: Okay.                        |
| 23 | MS. VAN LOON: Large Energy Group would                 |
| 24 | agree with that suggestion.                            |
| 25 | PRESIDING OFFICER WRIGHT: OCA?                         |

IN RE: INTERSTATE POWER AND LIGHT COMPANY HEARING 06/08/2023

| 1  | (No response.)  |
|----|---|
| 2  | PRESIDING OFFICER WRIGHT: Ms. Herndon?                |
| 3  | MS. HERNDON: That sounds good.                        |
| 4  | PRESIDING OFFICER WRIGHT: Mr. Mandelbaum,             |
| 5  | are you going to file a brief?                        |
| 6  | MR. MANDELBAUM: I think we might,                     |
| 7  | actually.   |
| 8  | PRESIDING OFFICER WRIGHT: So it will be               |
| 9  | simultaneous initial briefs. Do you want reply        |
| 10 | briefs?   |
| 11 | MR. SOWDEN: I don't think there's a need              |
| 12 | for them.   |
| 13 | PRESIDING OFFICER WRIGHT: Does anybody                |
| 14 | want to file a reply brief?                           |
| 15 | (No response.)  |
| 16 | PRESIDING OFFICER WRIGHT: Mr. Mandelbaum,             |
| 17 | do you want to file a reply brief?                    |
| 18 | MR. MANDELBAUM: I think we're okay.                   |
| 19 | PRESIDING OFFICER WRIGHT: Okay. And                   |
| 20 | Mr. Martin-Schramm, since you participated and you're |
| 21 | a witness, I will allow you to file I guess I don't   |
| 22 | know what to call them. If you have any additional    |
| 23 | information that is similar to a brief that you want  |
| 24 | to file, you can file it.                             |
| 25 | I'm not guaranteeing what weight we will              |

IN RE: INTERSTATE POWER AND LIGHT COMPANY HEARING 06/08/2023

| 1  | give it, but we will allow you to file something, if |
|----|--|
| 2  | you so desire.                                       |
| 3  | So the agreement, then, is 14 days after             |
| 4  | the transcript is filed in the Board's Electronic    |
| 5  | Filing System; correct?                              |
| 6  | (No response.)                                       |
| 7  | PRESIDING OFFICER WRIGHT: So I think that            |
| 8  | puts us with the briefs probably into July before an |
| 9  | order will be issued. As you're aware, dealing with  |
| 10 | the Iowa Code 17A, it will be a proposed decision    |
| 11 | order. The Board rules allow 15 days for you to      |
| 12 | appeal that to the Board or for the Board to take it |
| 13 | up on their own motion.                              |
| 14 | Is that okay? Does anybody think we need             |
| 15 | to do it quicker than that? Just allow them 15 days  |
| 16 | to run, is that okay?                                |
| 17 | MR. SOWDEN: Interstate Power and Light               |
| 18 | Company doesn't object to that.                      |
| 19 | MS. JOHNSON: That's fine.                            |
| 20 | PRESIDING OFFICER WRIGHT: Ms. Van Loon?              |
| 21 | Ms. Herndon? Mr. Mandelbaum?                         |
| 22 | (No response.)                                       |
| 23 | PRESIDING OFFICER WRIGHT: Okay. Let me               |
| 24 | make sure I have everything. You've participated     |
| 25 | before. You have to file the exhibits electronically |
|    |  |

IN RE: INTERSTATE POWER AND LIGHT COMPANY HEARING 06/08/2023

| 1  | within three days.                                  |
|----|---|
| 2  | Other than that, does anybody have anything         |
| 3  | else we need to take care of before we adjourn? Are |
| 4  | we back on live? I forgot to check. Anything else?  |
| 5  | If not, I appreciate how you dealt with the         |
| 6  | hearing, and it is adjourned.                       |
| 7  | (Hearing adjourned at 3:06 p.m.)                    |
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| 1  | CERTIFICATE  |
|----|--|
| 2  | I, the undersigned, a Certified Shorthand              |
| 3  | Reporter of the State of Iowa, do hereby certify that  |
| 4  | I acted as the official court reporter at the hearing  |
| 5  | in the above-entitled matter at the time and place     |
| 6  | indicated.   |
| 7  | That I took in shorthand all of the                    |
| 8  | proceedings had at the said time and place and that    |
| 9  | said shorthand notes were reduced to typewriting under |
| 10 | my direction and supervision, and that the foregoing   |
| 11 | typewritten pages are a full and complete transcript   |
| 12 | of the shorthand notes so taken.                       |
| 13 | Dated this 22nd day of June, 2023.                     |
| 14 |  |
| 15 |  |
| 16 | Darry K. Kriens  |
| 17 | CERTIFIED SHORTHAND REPORTER                           |
| 18 | Darcy Kriens, CSR #988                                 |
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