STATE OF IOWA DEPARTMENT OF COMMERCE BEFORE THE IOWA UTILITIES BOARD

IN RE:

INQUIRY INTO BILL PAYMENT AGREEMENTS FOR ELECTRIC AND NATURAL GAS SERVICE DOCKET NO. NOI-2014-0003

The Iowa Association of Municipal Utilities (IAMU) supports Mid American Energy Company's (MEC) request filed October 17, 2014 to extend the time for this docket to remain open and MEC's request for additional clarification of the issues related to payment plan agreements and the application of the statute of limitations to past due accounts.

IAMU and its members have participated in this docket. Municipal electric and gas utilities responded to the initial request for information and most attended the Customer Service Fall Meetings, including IAMU staff. In addition, IAMU filed a request for a clarification on October 8, 2014 in regard to the applicability of specific level payment plan rules to municipal gas and electric utilities.

Municipal electric and gas utilities are also implicated in a general way through a current customer complaint that is before the Board involving a municipal electric utility. IAMU reiterates MEC's statement that a "formal complaint process may not be the proper place to address these issues since the resolution of these issues will impact many parties." Although the facts in this customer complaint differ from those that MEC has asked for clarification, it does bring into question the need for a more general discussion with electric utilities in regard to the applicability of the rules regarding payment plan agreements, application of the statute of limitations, and reinstatement of service in the instance of disconnection versus reinstatement of service at a new premises.

IAMU respectfully requests the Board extend the time for this docket to remain open so that

participants can engage in a discourse in regard to these rules and their application to utilities.

Respectfully Submitted

Troy DeJoode Executive Director Iowa Association of Municipal Utilities