



Black Hills Energy
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November 7, 2014

By Electronic Filing

Ms. Joan Conrad
Executive Secretary
Iowa Utilities Board
1375 East Court Avenue, Room 69
Des Moines, IA 50319-0069

**FILED WITH
Executive Secretary
November 07, 2014
IOWA UTILITIES BOARD**

Re: Black Hills/Iowa Gas Utility Company, LLC d/b/a Black Hills Energy
Inquiry into Bill Payment Agreements for Electric and Natural Gas Service
Docket No. NOI-2014-0003
Letter in Lieu of Comments

Dear Secretary Conrad:

Black Hills / Iowa Gas Utility Company, LLC d/b/a Black Hills Energy ("BHE") hereby submits this letter in lieu of comments to the August 6, 2014 Board order for Docket No. 2014-0003. BHE hereby joins MidAmerican Energy Company's position as set forth in its October 17, 2014 Motion to Extend Time for Docket to Remain Open and Request for Additional Clarification, namely that the Board extend the time for the docket to remain open to allow further discussion on Staff's position regarding written payments not considered a written agreement under Iowa Code 476.20(5)(b).

Very truly yours,

/s/ Jason S. Keil

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