

**STATE OF IOWA  
DEPARTMENT OF COMMERCE  
IOWA UTILITIES BOARD**

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<b>IN RE:</b>	)	<b>DOCKET NOS: TF-2016-0321</b>
	)	<b>TF-2016-0322</b>
<b>INTERSTATE POWER AND LIGHT COMPANY</b>	)	

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**AMENDED OBJECTION BY ENVIRONMENTAL INTERVENORS**

The Environmental Law & Policy Center (ELPC) and Iowa Environmental Council (IEC), collectively “Environmental Intervenors,” file this amended objection in response to Interstate Power and Light Company’s (IPL) tariff filings on May 17, 2019, and subsequent workpaper filing on May 29, 2019. Environmental Intervenors object because IPL’s supporting data is unclear and inconsistent with similar data filings and because the proposed revisions to net metering caps are inconsistent with the goals of the net metering pilot.

**Background**

On May 17, 2019, IPL filed revised tariffs in TF-2016-0321 and TF-2016-0322. These revised tariffs responded to the Order issued by the Iowa Utilities Board (“Board”) on March 17, 2017, granting in part, and denying in part, applications for rehearing and requiring a revised tariff filing by IPL and represented the latest step in developing net metering pilot tariffs first ordered by the Board on July 19, 2016, as a culmination of the Distribution Generation Notice of Inquiry docket, NOI-2014-0001.

Commenters raised concerns in previous comments about the approach IPL proposed for establishing caps for net metering. On March 17, 2017, the Board issued an Order allowing IPL to proceed with its proposed approach. The Board also required IPL to provide additional

information and clarification on its approach in a revised tariff filing. IPL provided a revised tariff and supporting documentation, including workpapers to support the calculations. In 2018, IPL revised its tariff to incorporate updated calculations using 2017 class load data. IPL filed the supporting workpapers containing calculations of the class load data in conjunction with its 2018 revision.

IPL filed another revised tariff on May 17, 2019, but did not file the supporting workpapers with the underlying data and inputs associated with the proposed revisions. Environmental Intervenors filed an objection on May 29, 2019, that noted the lack of workpapers and requested a clarification that any revisions only apply prospectively to new distributed generation (DG) customers. On the same day that Environmental Intervenors filed the objection, IPL filed the supporting workpapers. After reviewing the workpapers that IPL filed on May 29, we have identified inconsistencies between the workpapers and IPL's recent class load data filing in docket IAC-2019-3511 that require clarification. The applicability of the proposed tariff continues to require clarification. Finally, the proposed revisions are inconsistent with the goals of the three-year net metering pilot.

**IPL's Workpapers Are Unclear and Inconsistent With Its Class Load Data Filing**

The Attachment A workpapers that IPL filed on May 29, 2019, have data that is inconsistent with the class load data that IPL filed in docket IAC-2019-3511 on May 15, 2019. The inconsistent data includes inputs for the load factor calculations, such as annual kilowatt-hour consumption by customer class, as well as the number of customers by class. For example, IPL's Attachment A filing for January 2018 provides the following kilowatt-hour consumption: Residential at 360,410,156; General Service at 201,182,102; Large General Service at 526,986,618 (found on row 12 of the Residential, General Service, and Large General Service

worksheets). IPL's class load data filing for the same month, January 2018, provides the following data: Residential at 400,477,595; General Service at 203,203,041; Large General Service at 534,251,041 (see Table 5, page 46).

IPL includes references and data regarding a sample of customers in the Attachment A workpapers, but it is unclear whether IPL derives data and bases load factor calculations on this sample of customers or the entire customer class.

Finally, IPL appears only to provide non-coincident demand data by customer class in the workpapers filed in this docket and does not include the non-coincident demand data or any explanation of this data in the class load data docket, IAC 2019-3511. Given the importance of this data for the load factor calculation used to establish net metering caps, we believe IPL should be filing this data along with a full explanation regarding the data in both dockets. IPL does not explain whether non-coincident demand data is metered actual data for the entire class, estimated data for the class, or estimated from metered data from a sample of customers, or some other approach.

Given the inconsistencies between Attachment A and the class load data filing, IPL should provide additional information to ensure the load factor calculations and resulting caps are accurate and based on a consistent data set.

**IPL's Proposed Revisions to Load Factors and Net Metering Caps Are Contrary to the Goals of the Pilot**

IPL's proposed revisions to load factors would reduce the size of DG systems that are eligible for net metering under the IPL approach to setting net metering caps. The reductions in DG system capacity eligible for net metering for typical general service and residential customers are in the range of 10-15%. For example, a general service customer with 150,000 kWh in annual consumption could net meter a 71 kW system under the 24% load factor in the

existing tariff (150,000/8760/.24). Under IPL's proposal of a 28% load factor, the same customer could only net meter a 61 kW system (150,000/8760/.28), a reduction of 14%. These changes come midway through the pilot program and erode the ability of the IPL pilot to accomplish the objectives of the pilot program established by the Board. The Board has stated that the net metering pilots were to be "consistent with Iowa Code §476.41, which encourages renewable energy development" and to "collect the data necessary to determine whether permanent revisions need to be made to the Board's net metering policies." Docket No. NOI-2014-0001, Order Directing Filing of Net Metering Tariffs (July 19, 2016) at 5 and 3. IPL's proposed changes in load factors and net metering caps, compared to current caps, will not encourage renewable energy development. In addition, making this change partway through the pilot project will lead to inconsistent data over the three-year pilot period.

**The Applicability of the Revised Tariff Remains Unclear**

IPL's workpaper filing does not resolve the issue regarding applicability of the revised tariff. The revised tariff does not explicitly limit its applicability to future or existing customers. On its face, it can apply to any customer. However, IPL filed an interpretation to accompany the tariff that states the revised load factors "will be utilized for new Pilot customers that do not have historic kW demand data," implying that existing customers in the Pilot would not be subject to the revision. More specifically, customers with incomplete data would fall in a gap that the interpretation does not address: they may not be new, but they may not have adequate historic kW demand data.

We suggest that this issue should be resolved before a final tariff revision takes effect.

**Conclusion**

Environmental Intervenors continue to have serious concerns about IPL's approach to limit net metering based on one-time customer demand. IPL's proposed revisions to the tariff make its approach for establishing net metering caps even worse for DG customers by further reducing the DG system size eligible for net metering for all classes of customers. The changes in net metering caps midway through the pilot undermine the renewable energy and data collection goals of the pilot. We encourage the Board to reject these changes and retain the existing load factors and associated caps, found in the 2018 filed tariff, for the remainder of the pilot project.

Respectfully submitted this 5th day of June, 2019.

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