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Interstate Power and Light Company
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August 16, 2012

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101-2147

RE: Interstate Power and Light Company
Docket No. G001/M-12-411
Reply Comments

Dear Dr. Haar:

Enclosed for e-filing with the Minnesota Public Utilities Commission, please find Interstate Power and Light Company's Reply Comments in the above-captioned docket.

Copies of this filing have been served on the Minnesota Department of Commerce, Division of Energy Resources, the Minnesota Attorney General-Residential and Small Business Utilities Division and the attached service list.

Respectfully Submitted,

/s/ Kent M. Ragsdale
Kent M. Ragsdale
Managing Attorney - Regulatory

KMR/tao
Enclosures

cc: Service List

STATE OF MINNESOTA

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger
Phyllis Reha
David C. Boyd
J. Dennis O'Brien
Betsy Wergin

Chair
Commissioner
Commissioner
Commissioner
Commissioner

| | |
|--|---------------------------------|
| <p>IN THE MATTER OF INTERSTATE POWER AND LIGHT COMPANY – GAS – 2011 ANNUAL SERVICE QUALITY REPORTS</p> | <p>DOCKET NO. G001/M-12-411</p> |
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AFFIDAVIT OF SERVICE

STATE OF IOWA)
) ss.
COUNTY OF LINN)

Tonya A. O'Rourke, being first duly sworn on oath, deposes and states:

That on the 16th day of August, 2012, copies of the foregoing Affidavit of Service, together with Interstate Power and Light Company's Reply Comments, were served upon the parties on the attached service list, by e-filing, messenger, electronic mail, facsimile and/or first-class mail, proper postage prepaid from Cedar Rapids, Iowa.

 /s/ Tonya A. O'Rourke
Tonya A. O'Rourke

Subscribed and Sworn to Before Me
this 16th day of August, 2012.

 /s/ Wendy E. Howard
Wendy E. Howard
Notary Public
My Commission Expires on September 6, 2012

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|-------------|-----------|-------------------------------|------------------------------------|--|--------------------|-------------------|----------------------|
| Bobby | Adam | bobby.adam@conagrafoods.com | ConAgra | Suite 5022 11 ConAgra Drive Omaha, NE 68102 | Paper Service | No | OFF_SL_12-411_12-411 |
| Christopher | Anderson | canderson@allete.com | Minnesota Power | 30 W Superior St Duluth, MN 558022191 | Electronic Service | No | OFF_SL_12-411_12-411 |
| Julia | Anderson | Julia.Anderson@ag.state.mn.us | Office of the Attorney General-DOC | 1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134 | Electronic Service | Yes | OFF_SL_12-411_12-411 |
| City | Attorney | N/A | City of Albert Lea | 221 E Clark St Albert Lea, MN 56007 | Paper Service | No | OFF_SL_12-411_12-411 |
| William A. | Blazar | bblazar@mnchamber.com | Minnesota Chamber Of Commerce | Suite 1500 400 Robert Street North St. Paul, MN 55101 | Paper Service | No | OFF_SL_12-411_12-411 |
| Michael | Bradley | bradley@moss-barnett.com | Moss & Barnett | 4800 Wells Fargo Ctr 90 S 7th St Minneapolis, MN 55402-4129 | Electronic Service | No | OFF_SL_12-411_12-411 |
| Sharon | Ferguson | sharon.ferguson@state.mn.us | Department of Commerce | 85 7th Place E Ste 500 Saint Paul, MN 551012198 | Electronic Service | No | OFF_SL_12-411_12-411 |
| Benjamin | Gerber | bgerber@mnchamber.com | Minnesota Chamber of Commerce | 400 Robert Street North Suite 1500 St. Paul, Minnesota 55101 | Electronic Service | No | OFF_SL_12-411_12-411 |
| Ronald | Giteck | ron.giteck@ag.state.mn.us | Office of the Attorney General-RUD | Antitrust and Utilities Division 445 Minnesota Street, BRM Tower St. Paul, MN 55101 | Electronic Service | No | OFF_SL_12-411_12-411 |
| David | Grover | dgrover@itctransco.com | ITC Midwest | 444 Cedar St Ste 1020 Saint Paul, MN 55101-2129 | Paper Service | No | OFF_SL_12-411_12-411 |

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| Burl W. | Haar | burl.haar@state.mn.us | Public Utilities Commission | Suite 350 121 7th Place East St. Paul, MN 551012147 | Electronic Service | Yes | OFF_SL_12-411_12-411 |
| Karen Finstad | Hammel | Karen.Hammel@ag.state.mn.us | Office of the Attorney General-DOC | 1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134 | Electronic Service | No | OFF_SL_12-411_12-411 |
| Annete | Henkel | mui@mutilityinvestors.org | Minnesota Utility Investors | 413 Wacouta Street #230 St.Paul, MN 55101 | Paper Service | No | OFF_SL_12-411_12-411 |
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| Jim | Krueger | jkrueger@fmcs.coop | Freeborn-Mower Cooperative Services | Box 611 Albert Lea, MN 56007 | Electronic Service | No | OFF_SL_12-411_12-411 |
| John | Lindell | agorud.ecf@ag.state.mn.us | Office of the Attorney General-RUD | 1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130 | Electronic Service | Yes | OFF_SL_12-411_12-411 |
| Kavita | Maini | kmains@wi.rr.com | KM Energy Consulting LLC | 961 N Lost Woods Rd Oconomowoc, WI 53066 | Paper Service | No | OFF_SL_12-411_12-411 |
| Pam | Marshall | pam@energycents.org | Energy CENTS Coalition | 823 7th St E St. Paul, MN 55106 | Paper Service | No | OFF_SL_12-411_12-411 |
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| Jenny L. | Myers | jmyers@iwla.org | Izaak Walton League of America | 1619 Dayton Ave. Suite 202 St. Paul, MN 55104 | Electronic Service | No | OFF_SL_12-411_12-411 |

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|------------|----------------|---------------------------------|---|--|--------------------|-------------------|----------------------|
| Carl | Nelson | cnelson@mncee.org | Center for Energy and Environment | 212 3rd Ave N Ste 560 Minneapolis, MN 55401 | Electronic Service | No | OFF_SL_12-411_12-411 |
| Steven | Nyhus | swnyhus@flaherty-hood.com | Flaherty & Hood PA | 525 Park St Ste 470 Saint Paul, MN 55103 | Electronic Service | No | OFF_SL_12-411_12-411 |
| Kent | Ragsdale | kentragdsdale@alliantenergy.com | Alliant Energy-Interstate Power and Light Company | P.O. Box 351 200 First Street, SE Cedar Rapids, IA 524060351 | Paper Service | No | OFF_SL_12-411_12-411 |
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| Larry L. | Schedin | Larry@LLSResources.com | LLS Resources, LLC | 12 S 6th St Ste 1137 Minneapolis, MN 55402 | Paper Service | No | OFF_SL_12-411_12-411 |
| Matthew J. | Schuerger P.E. | | Energy Systems Consulting Services, LLC | P.O. Box 16129 St. Paul, MN 55116 | Paper Service | No | OFF_SL_12-411_12-411 |
| Ron | Spangler, Jr. | rlspangler@otpc.com | Otter Tail Power Company | 215 So. Cascade St. PO Box 496 Fergus Falls, MN 565380496 | Electronic Service | No | OFF_SL_12-411_12-411 |
| Joseph | Sullivan | N/A | Flaherty and Hood P.A. | 525 Park Street Suite 470 Saint Paul, MN 55103-2011 | Paper Service | No | OFF_SL_12-411_12-411 |
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STATE OF MINNESOTA

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

**Beverly Jones Heydinger
David Boyd
J. Dennis O'Brien
Phyllis A. Reha
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**Chair
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**IN THE MATTER OF INTERSTATE
POWER AND LIGHT COMPANY – GAS
– 2011 ANNUAL SERVICE QUALITY
REPORTS**

DOCKET NO. G001/M-12-411

**INTERSTATE POWER AND LIGHT COMPANY'S
REPLY COMMENTS**

COMES NOW, Interstate Power and Light Company (IPL), and respectfully submits Reply Comments to the Minnesota Department of Commerce, Division of Energy Resources' (Department) July 27, 2012 Comments submitted in the above-referenced docket.

I. INTRODUCTION

On May 1, 2012, IPL filed a petition with the Commission regarding its 2011 Annual Gas Service Quality Report (2011 Report).

On July 27, 2012, the Department filed Comments that recommend that the Minnesota Public Utilities Commission accept IPL's 2011 Report pending IPL's response to the following in Reply Comments:

- a full discussion regarding the circumstances surrounding the 39 property damage claims reported March through August and whether anything could, or is being done to prevent recurrence in the future;

- a full explanation regarding the circumstances surrounding the emergency call wait times during March through September 2011 (excluding July);
- a full explanation regarding what, if anything, is being done to ensure that long wait times do not occur on its direct emergency line in the future; and
- a detailed discussion regarding the circumstances leading to the extended interruption periods reported in its two MOPS reports.

Additionally, the Department requested that IPL provide, on a going-forward basis, “Total” columns, in addition to “Monthly Average” columns, for its complaint information in its Appendix A to increase the usability of the data.

In response to the Department’s recommendations, IPL provides the following Reply Comments:

II. REPLY COMMENTS

A. Customer Complaints

On page 6 of its Comments the Department requests that IPL provide a full discussion in Reply Comments regarding the circumstances surrounding the 39 property damage complaints received between March and August 2011 and whether anything could, or is being done to provide recurrence in the future.

A review of the data revealed that all 2011 property damage complaints, not just those received between March and August 2011, can be attributed to electric activities.

Additionally, the Department requests IPL to provide, on a going-forward basis, “Total” columns in addition to “Monthly Average” columns, for its complaint information in IPL’s Appendix A.

IPL agrees with the Department’s recommendation and will provide this information in its future natural gas service quality reports.

B. Emergency Line Response Times

The Department requests on page 7 of its Comments that IPL fully explain in Reply Comments the circumstances surrounding the emergency call wait times during March through September 2011 (excluding July 2011).

IPL staffs its Call Centers to ensure its ability to achieve the Minnesota service rule that requires it to answer 80 percent of calls within 20 seconds. Calls from Minnesota route to a select group of agents that exclusively handle Minnesota customers. If this group of agents is unavailable, Minnesota calls route to any available IPL Call Center staff and receive priority queuing in an effort to meet Minnesota's regulatory requirement for call handling. Despite that operating model, significant storm events and the randomness of calls and call types – especially calls which may involve electric or natural gas emergencies – can negatively impact both the average answer times as well as the answer times for individual calls.

IPL operates its own Call Centers and does not outsource or offshore any of its call handling. Employees in IPL's two Centers handled a total of 1,024,885 calls in 2011, with just 2,546 of that total (0.25 percent) being emergency calls for Minnesota.

As noted, on average throughout 2011, IPL answered 85.4 percent of all calls within 20 seconds, as required by Minnesota rules for electric utilities. For all emergency call types specifically during the March to September 2011 timeframe (excluding July), IPL handled – on average each month – 72.4 percent of calls in 20 seconds or less. Although standards for wait times vary widely across the call center industry, IPL and its sister company, Wisconsin Power and Light Co., generally consider 60 seconds to be a reasonable response time and have established internal service-level goals to answer 75 percent of calls within 60 seconds, which the companies use

as their basis for operations and regulatory reporting in their Iowa and Wisconsin service territories. When this standard is applied, IPL believes its handling of Minnesota emergency calls to be acceptable, especially considering the relatively small volume and unpredictable arrival patterns for electric outage and gas odor/emergency calls.

IPL notes that during periods of high emergency calls – such as electrical storm events – the incremental call volume does not necessarily produce incremental information on operational issues that need to be addressed. More likely, multiple customers are calling about the same issues – and often issues that the company is already in the process of addressing. In those circumstances, IPL updates the voice recording so that, prior to answering the customer calls, customers are informed that IPL knows there are electrical outage issues. IPL annually reviews current call-routing plans to ensure the efficacy of routing all call types. IPL's goal is to manage its Call Center resources to provide the best overall experience for customers, while being mindful of the costs that all customers are asked to share for delivering customer service via the Call Centers. To date, IPL has staffed its call centers to manage all calls to the standards, on average. If IPL were to staff the call center to meet the same standard for emergency calls (as a subset of total calls), then IPL would need to add staff. Those staff would be idle for periods of normal call volume. To date, IPL has not judged this to be the best or most cost-effective overall solution for customers.

IPL would like to reiterate that it is unable to segregate the electric outage calls from gas odor/emergency calls, which is negatively influencing the data for the gas calls. As a point of reference, during 2011 there were 245 gas emergency orders dispatched from IPL's Distribution Dispatch Center for its Minnesota service territory, which can be used as a conservative approximation of the number of gas emergency

calls received. This represents only 9.6 percent of the total emergency calls received. Perhaps more impactful to customer safety is the fact that IPL responded to 100 percent of those 245 gas emergency calls within 60 minutes, with an average response time of 18.8 minutes.

Additionally, the Department recommends that IPL explain what is being done to ensure that long wait times do not occur on its direct emergency line in the future.

As stated above, IPL takes seriously its responsibility to appropriately manage emergency calls, and will continue to look for cost-effective solutions to provide satisfactory performance. The circumstances of the excessively long wait time reported in July 2011 are documented, and IPL considers it to be an anomaly, having occurred during a significant electric outage event. IPL has reviewed its operating procedures and call queuing protocols, and determined they worked as designed.

Additionally, as a point of clarification, the direct emergency line is not available for customers or the general public, but rather, it is intended for use by emergency response personnel only. The emergency line number addressed here is a legacy number that has not been widely disseminated. The number, which received a total of three (3) calls in 2011, does not utilize any automated call-handling technology to help route calls. IPL does plan to re-route the number into the overall queue to minimize wait times in the future.

C. Interruption Periods

On page 9 of its Comments, the Department requests that IPL provide detailed discussion regarding the circumstances leading to the extended interruption periods reported in two Minnesota Office of Pipeline Safety (MNOPS) reports.

In the two line hits discussed, IPL attempted to notify the customers using door hangars and phone calls. The biggest driver for customers requesting re-lights appears to be their desire to use the installed gas utilization equipment, whether it be cooking equipment, clothes dryer, or a furnace/boiler. In some cases, the only installed gas-fired equipment is the furnace, and on those occasions, customers may not call for a relight until the weather begins to turn cold. That was the case for the two premises with extended interruption periods of 43 and 57 days, respectively.

III. CONCLUSION

WHEREFORE, IPL respectfully requests the Commission give IPL's Reply Comments due consideration.

DATED this 16th day of August, 2012.

Respectfully submitted,

Interstate Power and Light Company

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