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Michael S. Greiveldinger  
Managing Attorney

May 15, 2015

Mr. Daniel P. Wolf, Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101-2147

RE: Interstate Power and Light Company  
Docket No. G999/AA-14-580  
Reply Comments

Dear Mr. Wolf:

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

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

Respectfully submitted,

/s/ Michael S. Greiveldinger  
Michael S. Greiveldinger  
Managing Attorney

MSG/kcb  
Enclosures

cc: Service List

Interstate Power and Light Company  
An Alliant Energy Company

Alliant Tower  
200 First Street SE  
P.O. Box 351  
Cedar Rapids, IA 52406-0351

Office: 1.800.822.4348  
www.alliantenergy.com

**STATE OF MINNESOTA**  
**BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

**Beverly Jones Heydinger**  
**Nancy Lange**  
**Dan Lipschultz**  
**John Tuma**  
**Betsy Wergin**

**Chair**  
**Commissioner**  
**Commissioner**  
**Commissioner**  
**Commissioner**

<b>IN THE MATTER OF 2013-2014 ANNUAL AUTOMATIC ADJUSTMENT REPORTS AND ANNUAL PURCHASED GAS ADJUSTMENT TRUE-UP FILINGS</b>	<b>DOCKET NOS. G999/AA-14-580</b>
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**AFFIDAVIT OF SERVICE**

STATE OF IOWA            )  
  ) ss.  
COUNTY OF LINN        )

Kathleen C. Balvanz, being first duly sworn on oath, deposes and states:

That on the 15<sup>th</sup> day of May, 2015, 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, overnight delivery, electronic mail, and/or first-class mail, proper postage prepaid from Cedar Rapids, Iowa.

          /s/ Kathleen C. Balvanz            
Kathleen C. Balvanz

Subscribed and Sworn to Before Me  
this 15<sup>th</sup> day of May, 2015.

          /s/ Beverly A. Petska            
Beverly A. Petska  
Notary Public  
My Commission expires on November 12, 2017

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tamie A.	Aberle	tamie.aberle@mdu.com	Great Plains Natural Gas Co.	400 North Fourth Street  Bismarck, ND 585014092	Electronic Service	No	OFF_SL_14-580_G999-AA-14-580
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_14-580_G999-AA-14-580
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.	202 S. Main Street  Le Sueur, MN 56058	Electronic Service	No	OFF_SL_14-580_G999-AA-14-580
Marie	Doyle	marie.doyle@centerpointenergy.com	CenterPoint Energy	800 LaSalle Avenue P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_14-580_G999-AA-14-580
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_14-580_G999-AA-14-580
Michael	Greiveldinger	michaelgreiveldinger@alliantenergy.com	Interstate Power and Light Company	4902 N. Biltmore Lane  Madison, WI 53718	Electronic Service	No	OFF_SL_14-580_G999-AA-14-580
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.	202 South Main Street P.O. Box 68 Le Sueur, MN 56058	Electronic Service	No	OFF_SL_14-580_G999-AA-14-580
Amber	Lee	ASLee@minnesotaenergyresources.com	Minnesota Energy Resources Corporation	2665 145th Street West  Rosemount, MN 55068	Electronic Service	No	OFF_SL_14-580_G999-AA-14-580
Paul J.	Lehman	paul.lehman@xcelenergy.com	Xcel Energy	414 Nicollet Mall  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_14-580_G999-AA-14-580
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_14-580_G999-AA-14-580
Regulatory	Records	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_14-580_G999-AA-14-580

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_14-580_G999- AA-14-580

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	Electronic Service	No	OFF_SL_14-742_AA-14-742
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	OFF_SL_14-742_AA-14-742
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_14-742_AA-14-742
William A.	Blazar	bblazar@mnchamber.com	Minnesota Chamber Of Commerce	Suite 1500 400 Robert Street North St. Paul, MN 55101	Electronic Service	No	OFF_SL_14-742_AA-14-742
Michael	Bradley	mike.bradley@lawmoss.com	Moss & Barnett	150 S. 5th Street, #1200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-742_AA-14-742
City	Clerk	sschulte@ci.albertlea.mn.us	City of Albert Lea	221 E Clark St  Albert Lea, MN 56007	Electronic Service	No	OFF_SL_14-742_AA-14-742
Ian	Dobson	ian.dobson@ag.state.mn.us	Office of the Attorney General-RUD	Antitrust and Utilities Division 445 Minnesota Street, 1400 BRM Tower St. Paul, MN 55101	Electronic Service	No	OFF_SL_14-742_AA-14-742
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_14-742_AA-14-742
Michael	Greiveldinger	michaelgreiveldinger@alliantenergy.com	Interstate Power and Light Company	4902 N. Biltmore Lane  Madison, WI 53718	Electronic Service	No	OFF_SL_14-742_AA-14-742
David	Grover	dgrover@itctransco.com	ITC Midwest	901 Marquette Avenue Suite 1950 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-742_AA-14-742

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_14-742_AA-14-742
Linda	Jensen	linda.s.jensen@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_14-742_AA-14-742
Jim	Krueger	jkueger@fmcs.coop	Freeborn-Mower Cooperative Services	Box 611  Albert Lea, MN 56007	Electronic Service	No	OFF_SL_14-742_AA-14-742
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_14-742_AA-14-742
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd  Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_14-742_AA-14-742
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Electronic Service	No	OFF_SL_14-742_AA-14-742
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_14-742_AA-14-742
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_14-742_AA-14-742
Steven	Nyhus	swnyhus@flaherty-hood.com	Flaherty & Hood PA	525 Park St Ste 470  Saint Paul, MN 55103	Electronic Service	No	OFF_SL_14-742_AA-14-742
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	OFF_SL_14-742_AA-14-742

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	12 S 6th St Ste 1137  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-742_AA-14-742
Matthew J.	Schuerger P.E.	mjsreg@earthlink.net	Energy Systems Consulting Services, LLC	PO Box 16129  St. Paul, MN 55116	Electronic Service	No	OFF_SL_14-742_AA-14-742
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_14-742_AA-14-742
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE  Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_14-742_AA-14-742
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_14-742_AA-14-742

**STATE OF MINNESOTA**

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<b>IN THE MATTER OF 2013-2014 ANNUAL AUTOMATIC ADJUSTMENT REPORTS AND ANNUAL PURCHASED GAS ADJUSTMENT TRUE-UP FILINGS</b>	<b>DOCKET NO. G999/AA-14-580</b>
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**INTERSTATE POWER AND LIGHT COMPANY'S  
REPLY COMMENTS**

**COMES NOW**, Interstate Power and Light Company (IPL or Company), and respectfully submits to the Minnesota Public Utilities Commission (Commission) its Reply Comments to the Minnesota Department of Commerce, Division of Energy Resources (Department) Response Comments in the Department's Review of the 2013-2014 Annual Automatic Adjustment Reports for rate-regulated gas utilities in Minnesota (FYE14 AAA), filed on May 5, 2015, in the above-referenced docket.

**I. INTRODUCTION**

On August 29, 2014, IPL filed its natural gas report for its annual automatic adjustment report for the twelve month reporting period ending June 30, 2014.

On May 5, 2015, the Department filed its report (AAA Report) summarizing the Department review of the 2013-2014 automatic adjustment filings submitted by the natural gas utilities in Minnesota. The Department concluded that IPL's filing was complete with respect to Minnesota Rules 7825.2390 through 7825.2920 and, based on its review, the Department recommended that the Commission: (1) accept IPL's true-up



filing in Docket No. G001/AA-14-742; and (2) allow IPL to implement its true-up, as shown in Department Attachment G7 of the AAA Report. Additionally, the Department provided several recommendations applicable to all utilities in its AAA Report.

IPL provides the following reply comments:

## **II. IPL REPLY COMMENTS**

IPL agrees with the Department's recommendations to the Commission to accept IPL's true-up filing in Docket No. G001/AA-14-742 and allow IPL to implement its true-up, as shown in Department Attachment G7 of its AAA Report.

The Department also recommended that all the utilities total the gas costs in their Contractor Main Strikes Report and provide the allocation of gas costs credited to each class in its true up of commodity costs. IPL filed the Contractor Main Strikes Report as Attachment A in its natural gas annual automatic adjustment report for the twelve month reporting period ending June 30, 2014. The total cost of lost gas in the Contractor Main Strikes Report is \$252.70, of which \$153.97 was allocated to firm customers and \$98.73 to interruptible customers.

The Department also recommended that each utility, except IPL, have a tariff provision which gives utilities the right to revoke interruptible customer class status from habitually non-compliant interruptible customers by discontinuing service or moving the customer to firm service. The Department then requested the utilities provide discussion on a number of questions pertaining to interruptible services. Since IPL was excluded from changing its tariffs and has completed the sale of its Minnesota Gas Assets, the Company believes that those questions are inapplicable to it and will not be providing responses to the Department questions pertaining to interruptible services.

**WHEREFORE**, IPL respectfully requests the Commission give IPL's reply comments due consideration.

DATED this 15<sup>th</sup> day of May 2015.

Respectfully submitted,

INTERSTATE POWER AND LIGHT COMPANY

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