



Alliant Energy Corporate Services, Inc.
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Samantha C. Norris
Senior Attorney - Regulatory

April 23, 2015

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

RE: Interstate Power and Light Company
Docket No. E001/M-15-200
Reply Comments

Dear Mr. Wolf:

Enclosed for e-Filing 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/ Samantha C. Norris
Samantha C. Norris
Senior Attorney - Regulatory

SCN/kcb
Enclosures

cc: Service List

Interstate Power and Light Co.
An Alliant Energy Company

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

Office: 1.800.822.4348
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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

IN THE MATTER OF INTERSTATE
POWER AND LIGHT COMPANY'S
REQUEST FOR ELECTRIC VEHICLE
RECHARGING TARIFF

DOCKET NO. E001/M-15-200

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 23rd day of April, 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 23rd day of April, 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
Bobby	Adam	bobby.adam@conagrafoods.com	ConAgra	Suite 5022 11 ConAgra Drive Omaha, NE 68102	Electronic Service	No	OFF_SL_15-200_M-15-200
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_15-200_M-15-200
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Michael	Bradley	mike.bradley@lawmoss.com	Moss & Barnett	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-200_M-15-200
City	Clerk	sschulte@ci.albertlea.mn.us	City of Albert Lea	221 E Clark St Albert Lea, MN 56007	Electronic Service	No	OFF_SL_15-200_M-15-200
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_15-200_M-15-200
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_15-200_M-15-200

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_15-200_M-15-200

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_15-200_M-15-200

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**

**IN THE MATTER OF INTERSTATE POWER
AND LIGHT COMPANY'S REQUEST FOR
ELECTRIC VEHICLE RECHARGING
TARIFF**

DOCKET NO. E001/M-15-200

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

COMES NOW, Interstate Power and Light Company (IPL), respectfully submits *Reply Comments* to the Minnesota Department of Commerce Division of Energy Resources (Department) April 13, 2015 *Comments* submitted in the above-referenced docket.

I. INTRODUCTION

On May 16, 2014, Governor Mark Dayton signed into law Minn. Stat. §216B.1614, a requirement that each public utility selling electricity at retail in the state of Minnesota, file with the Commission a tariff that allows a customer to purchase electricity solely for the purpose of recharging an electric vehicle. IPL requested approval of a new service offering, Optional Residential Electric Vehicle Recharging Rider ("EV Rider" "EV"), as required by Minn. Stat. § 216B.1614. IPL filed the tariff on March 2, 2015. IPL's new service offering is designed for the charging of electric vehicles on a time-of-use rate.

II. COMMENTS

The Department filed comments to IPL's proposed EV tariff on April 13, 2015. As noted by the Department in its Comments, IPL indicated in response to one of the Department's prior Information Requests that those customers choosing to have sub-metering within this proposed service option would be billed a separate monthly excess facilities charge. In its Comments, the Department contends that a separate charge for sub-metering appears to violate Minn Stat. §216B.1614, Subd. 2(c)(4) which requires the cost of metering or sub-metering to be incorporated within the rate charged to the customer. The Department acknowledged that serving an EV customer would include additional metering and possible billing costs, but remains unclear about the extent to which an EV customer would incur additional primary and secondary distribution costs that would not already be recovered through the customer charge for standard residential service. The Department contends that customers with standard residential service who add service under the EV tariff would be paying two customer charges and possibly an additional excess facilities charge for sub-metering. The Department recommended that IPL provide additional information in reply comments on the incremental customer cost of serving an EV customer. IPL's response to the Department's recommendation follows.

As described below, IPL's proposal to charge both a customer charge for the EV tariff (\$11.85 per month) and the standard residential tariff (\$8.50 per month) is still consistent with the cost basis of customer-related expenses of a residential customer, as in Docket No. E001/GR-10-276 IPL's class cost of service study supported a residential customer charge of \$19.47 per month. This amount would not reflect the cost of a second meter installation. In addition, the Commission has approved and IPL

has charged a customer charge specific to each tariff when a customer receives service under multiple tariffs, such as a residential customer receiving service under both the standard residential rate (Rate Schedule 160) and the controlled water-heating rate (Rate Schedule 350).

The provision in the tariff under contention is:

“A customer can elect to separately sub-meter the recharging facilities under the same residential service connection in which case kWh purchases for electric vehicle recharging would be deducted from the customer’s regular electric service kWh billings. All metering installations shall be in compliance with IPL’s Electric Service Rules.”

The scenario in question pertains to the meter charge in the event the customer is served under IPL’s standard residential time-of-use service rate (rate code 167-8) and then elects to sub-meter the electric vehicle under the EV tariff. The customer would be subject to both the customer charge under rate code 167-8 of approximately \$11.85 per month and the excess facilities charge of \$2.75 per month (assuming the installed cost of the meter is \$175 which includes materials and labor). An existing time-of-use customer would not be subject to an additional customer charge for the EV sub-metering but just the incremental cost of the second meter through an excess facilities charge.

The other scenario would be if the customer is served under the standard residential rate 160 (non-time-of-day) and also wants service under the EV Rider tariff. Under this scenario the application of both the EV customer charge and the regular residential customer charge would be applicable and there would be no excess facilities

charge. There is no scenario in which a customer would pay an excess facilities charge in addition to both a standard customer charge and an EV customer charge.

III. CONCLUSION

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

DATED this 23rd day of April, 2015.

Respectfully submitted,

Interstate Power and Light Company

By: /s/ Samantha C. Norris

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