

July 23, 2014

Burl W. Haar  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, Minnesota 55101-2147

**RE: Response Comments of the Minnesota Department of Commerce, Division of Energy Resources in the Matter of Interstate Power and Light Company's (IPL or the Company) Request for Approval of the Company's Electric Conservation Cost Recovery Adjustment (CCRA) and 2013 Electric Demand Side Management (DSM) Financial Incentive (collectively referred to as the *Petition*).**  
Docket No. E001/M-14-284

Dear Dr. Haar:

On July 16, 2014, the Minnesota Department of Commerce (Department) submitted *Comments* to the Minnesota Public Utilities Commission (Commission) recommending that the Commission approve IPL's proposed DSM financial incentive and discontinue allowing the recovery of carrying charges for under- or over-recovered balances in IPL's Conservation Improvement Program (CIP) tracker account. Further the Department requested that IPL address an apparent miscalculation of the Company's CIP tracker account balance.

On July 22, 2014, IPL submitted a *Letter in Lieu of Reply Comments* confirming its miscalculation and agreeing with the Department's calculation of the Company's CIP tracker account balance for 2013, as shown below in Table 1.

**Table 1: Summary of IPL's Electric CIP Tracker Account Activity in 2013<sup>1</sup>**

<u>Description</u>	<u>Time Period</u>	<u>Amount</u>
Beginning Balance	31-Dec-12	(\$694,034)
CIP Expenses <sup>2</sup>	January 1 through December 31, 2013	\$3,539,537
Carrying Charges	January 1 through December 31, 2013	\$10,875
Base Rate Recovery <sup>3</sup>	January 1 through December 31, 2013	(\$2,169,337)
<u>CIP Factor Recovery</u>	<u>January 1 through December 31, 2013</u>	<u>\$1,522,264</u>
Ending Balance	31-Dec-13	\$2,209,305

<sup>1</sup> Values are rounded to the nearest dollar

<sup>2</sup> CIP expenditures include the 2012 DSM Incentive

<sup>3</sup> CIP Recovery Factor was positive during 2012 due to a negative CCRA to account for over-collection of CIP expenditures by the Company

Consistent with the corrected CIP tracker account balance, IPL adjusted the Company's requested Conservation Cost Recovery Adjustment (CCRA) from \$0.0038/kWh to \$0.00281/kWh. The Department's calculations agree with IPL's revised CCRA, as shown in Table 2.

**Table 2: IPL's Calculation of its Proposed 2014/2015 Electric CCRA**

<b>Description</b>	<b>Amount</b>
Electric CIP Tracker Account Balance as of December 31, 2013	\$2,209,305
CIP Approved Spending Levels for 12 months beginning January 2014	\$2,257,040
CIP Cost Recovery via Base Rates – Jan-Dec 2014	(\$2,147,613)
<u>CIP Cost Recovery via CCRA – Jan 2014-May 2014</u>	<u>(\$73,598)</u>
Beginning CIP Tracker Account Balance – June 2014	\$2,245,134
Projected Annual kWh Sales for 2014	798,369,140
Proposed Electric CCRA (\$/kWh)	\$0.00281

The Department recommends that the Commission:

- 1) approve IPL's 2013 CIP tracker account, as provided in the Company's *Letter in Lieu of Reply Comments* and summarized in Table 1 above;
- 2) approve IPL's proposed CCRA of \$0.00281/kWh for all customer classes and require that the CCRA approved by the Commission be effective in the billing month immediately following the issue date of the of the *Order* in the present docket, conditioned on the Company submitting, within 10 days of the *Order*, a compliance filing with the relevant tariff sheets and necessary calculations that comply with the Commission's determinations; and
- 3) require IPL to include the following bill message (with the correct effective date added) in the billing month immediately following the date of the *Order* in the present docket:

IPL recovers the costs of its energy conservation programs in Minnesota through a Conservation Cost Recovery Adjustment (CCRA). The CCRA is an annual adjustment subject to Minnesota Public Utilities Commission approval. Based on actual and anticipated energy efficiency costs, the revised 2014 CCRA, as approved the Commission, will be \$0.00281/per kWh effective MM/DD/YYYY. Learn more about reducing your energy use by visiting our website at [www.alliantenergy.com/save](http://www.alliantenergy.com/save) or calling us at 1-866-255-4268.

Further explanation of these recommendations is available in the Department's July 16, 2014 *Comments*. In those *Comments* the Department also recommended that the Commission:

- 4) approve IPL's proposed electric 2012 DSM financial incentive of \$263,420.53 and allow the Company to book this amount in its tracker account; and
- 5) discontinue approving carrying charges for under- or over-recovered balances in IPL's CIP tracker account beginning in the month after the Commission issues its *Order* in this docket;
- 6) in the event that the Commission continues to allow the application of carrying charges to the over and under recovery of CIP tracker accounts, disallow application of the carrying charge to the Company's financial incentive.

The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ MICHAEL N. ZAJICEK  
Rates Analyst

MNZ/lt

## **CERTIFICATE OF SERVICE**

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce  
Letter**

**Docket No. E001/M-14-284**

**Dated this 23<sup>rd</sup> day of July 2014**

**/s/Sharon Ferguson**

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