

Alliant Energy Corporate Services, Inc. Legal Department 319.786.4742 Telephone 319.786.4533 – Fax

Paula N. Johnson Senior Attorney – Regulatory

July 22, 2014

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. E001/M-14-284

Letter in Lieu of Reply Comments

Dear Dr. Haar:

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

On July 15, 2014, the Minnesota Department of Commerce, Division of Energy Resources (Department), filed its Comments in this proceeding. IPL appreciates the Department's comments. The Department recommended that, in reply comments, IPL should confirm that the ending balance of IPL's Electric Conservation Improvement Program Tracker Account for 2013 was \$2,209,305.

IPL reviewed its information and discovered a formula error in the original balance filed by IPL. Tab 16 at page 1 of 25 of IPL's filing did not account for the previous year-end balance of (\$694,034). IPL concurs with the Department that the ending balance of \$2,209,305 is correct and is filing a Corrected Exhibit No. 1, Sheet 1 of 2, with this letter.

In light of this error, IPL is also submitting corrected tariff sheets, which reflect a revision to the conservation cost recovery adjustment (CCRA) factor from \$0.00368/kWh to \$0.00281/kWh. IPL requests this revised CCRS be approved effective October 1, 2014.

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

Dr. Burl W. Haar July 22, 2014 Page 2 of 2

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

Respectfully Submitted,

/s/ Paula N. Johnson
Paula N. Johnson
Senior Attorney – Regulatory

PNJ:kcb Enclosures

cc: Service List

STATE OF MINNESOTA

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger Chair
David C. Boyd Commissioner
Nancy Lange Commissioner
Dan Lipschultz Commissioner
Betsy Wergin Commissioner

IN THE MATTER OF INTERSTATE POWER AND LIGHT COMPANY - ELECTRIC FINANCIAL INCENTIVES, CONSERVATION COST RECOVERY ADJUSTMENTS

DOCKET NO. E001/M-14-284

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 22nd day of July, 2014, copies of the foregoing Affidavit of Service, together with Interstate Power and Light Company's Letter in Lieu of Reply Comments, were served upon the parties on the attached service list, by efiling, overnight delivery, electronic mail, and/or first-class mail, proper postage prepaid from Cedar Rapids, Iowa.

<u>/s/ Kathleen C. Balvanz</u> Kathleen C. Balvanz

Subscribed and Sworn to Before Me this 22nd day of July, 2014

/s/ Kathleen J. Faine

Kathleen J. Faine
Notary Public
My Commission expires on February 20, 2015

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Bobby	Adam	bobby.adam@conagrafood s.com	ConAgra	Suite 5022 11 ConAgra Drive Omaha, NE 68102	Electronic Service	No	OFF_SL_14-284_M-14-284
George	Agriesti	gagriesti@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_14-284_M-14-284
Julie Rae	Ambach	jambach@shakopeeutilities .com	ties Shakopee Public Utilties 255 Sarazin St Electronic Service No Shakopee, MN 55379		No	OFF_SL_14-284_M-14-284	
Julia	Anderson	Julia.Anderson@ag.state.m n.us	Office of the Attorney General-DOC			Yes	OFF_SL_14-284_M-14-284
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_14-284_M-14-284
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William A.	Blazar	bblazar@mnchamber.com	Minnesota Chamber Of Commerce	Suite 1500 400 Robert Street Not St. Paul, MN 55101	Electronic Service th	No	OFF_SL_14-284_M-14-284
Michael	Bradley	mike.bradley@lawmoss.co m	Moss & Barnett	Suite 4800 Electronic Service No 90 S 7th St Minneapolis, MN 55402-4129		No	OFF_SL_14-284_M-14-284
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson & Byron, P.A.	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_14-284_M-14-284
Gary	Chesnut	gchesnut@agp.com	AG Processing Inc. a cooperative	12700 West Dodge Road PO Box 2047 Omaha, NE 681032047	Electronic Service	No	OFF_SL_14-284_M-14-284

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name		
City	Clerk	sschulte@ci.albertlea.mn.u s	City of Albert Lea	221 E Clark St Albert Lea, MN 56007	Electronic Service	No	OFF_SL_14-284_M-14-284		
Gary	Connett	gconnett@grenergy.com	Great River Energy	12300 Elm Creek Blvd N Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_14-284_M-14-284		
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_14-284_M-14-284		
Jill	Curran	jcurran@mnchamber.com	Minnesota Waste Wise	nnesota Waste Wise 400 Robert Street North Suite 1500 St. Paul, Minnesota 55101 Electronic Service No		OFF_SL_14-284_M-14-284			
Jeffrey A.	Daugherty	jeffrey.daugherty@centerp ointenergy.com	Office of the Attorney General-RUD	Office of the Attorney General-RUD	800 LaSalle Ave Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-284_M-14-284	
lan	Dobson	ian.dobson@ag.state.mn.u s			General-RUD	Antitrust and Utilities Division 445 Minnesota Street, BRM Tower St. Paul, MN 55101	Electronic Service 1400	No	OFF_SL_14-284_M-14-284
Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400 Plymouth, MN 554475142	Electronic Service	No	OFF_SL_14-284_M-14-284		
Chris	Duffrin	chrisd@thenec.org	Neighborhood Energy Connection	624 Selby Avenue St. Paul, MN 55104	Electronic Service	No	OFF_SL_14-284_M-14-284		
Jim	Erchul		Daytons Bluff Neighborhood Housing Sv.			823 E 7th St St. Paul, MN 55106	Paper Service	No	OFF_SL_14-284_M-14-284
Greg	Ernst gaernst@q.com G. A. Ernst & Associates Inc.		G. A. Ernst & Associates, Inc.	2377 Union Lake Trl Northfield, MN 55057	Electronic Service	No	OFF_SL_14-284_M-14-284		

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Pat	Green	N/A		N Energy Dev C	N Energy Dev	N Energy Dev	City Hall 401 E 21st St Hibbing, MN 55746	Paper Service	No
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Norm	Harold	N/A	NKS Consulting	5591 E 180th St Paper Service Prior Lake, MN 55372		No	OFF_SL_14-284_M-14-284	
Jared	Hendricks	hendricksj@owatonnautiliti es.com	208 S Walnut Ave Owatonna, MN 55060-2940		OFF_SL_14-284_M-14-284			
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Paula	Johnson	paulajohnson@alliantenerg y.com	Alliant Energy-Interstate Power and Light Company	P.O. Box 351 200 First Street, SE Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_14-284_M-14-284		
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Steven	Nyhus	swnyhus@flaherty- hood.com			525 Park St Ste 470 Saint Paul, MN 55103	Electronic Service	No	OFF_SL_14-284_M-14-284		
Gary	Olson		Product Recovery, Inc.	2605 E Cliff Rd Burnsville, MN 55337	Paper Service	No	OFF_SL_14-284_M-14-284			
Kim	Pederson	kpederson@otpco.com	Otter Tail Power Company	Otter Tail Power Company	Otter Tail Power Company 2	Otter Tail Power Company :	215 S Cascade St PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_14-284_M-14-284
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				55101					
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	12 S 6th St Ste 1137 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-284_M-14-284		
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_14-284_M-14-284		
Cindy	Schweitzer Rott	cindy.schweitzer@clearesu lt.com	CLEAResult's			No	OFF_SL_14-284_M-14-284		
Tom	Smilanich		·	South St. Paul, MN 55075 Ren.smith@districtenergy.c District Energy St. Paul Inc. St. Paul, MN MN	Paper Service	No	OFF_SL_14-284_M-14-284		
Ken	Smith	ken.smith@districtenergy.c om District Energy St. Paul Inc. 76 \			nergy.c District Energy St. Paul Inc.	@districtenergy.c District Energy St. Paul Inc.		St. Paul,	Electronic Service
Ron	Spangler, Jr.	rlspangler@otpco.com	Otter Tail Power Company	215 So. Cascade St. PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_14-284_M-14-284		
Leo	Steidel	N/A	The Weidt Group			No	OFF_SL_14-284_M-14-284		
John	Steinhoff		Resource Solutions, Inc.	318 Kensington Drive Madison, WI 53704	Paper Service	No	OFF_SL_14-284_M-14-284		
Richard	Szydlowski rszydlowski@mncee.org Center for Energy Environment		Center for Energy & Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401-1459	Electronic Service	No	OFF_SL_14-284_M-14-284		

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
SaGonna	Thompson	Regulatory.Records@xcele nergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_14-284_M-14-284
Steve	Tomac	stomac@bepc.com	Basin Electric Power Cooperative	1717 E Interstate Ave Bismarck, ND 58501	Electronic Service	No	OFF_SL_14-284_M-14-284
Lisa	Wilson	lisa.wilson@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	OFF_SL_14-284_M-14-284
Robyn	Woeste	robynwoeste@alliantenerg y.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_14-284_M-14-284

Interstate Power and Light Company Electric Utility (Minnesota)

Conservation Improvement Program (CIP)

Development of Annual Adjustment Factor

			Со	st Recovery	CIP	Adjust.						
	Gros	ss		se Rates		covery		Net	Carı	ying	CIF	P Tracker
Year	Ехрє	enditures	(\$0).00171)	(\$0.	.00291)		xpenditures	Cha	rge		lance
1991		123,050	\$	(73,136)			\$	49,914	\$	195	\$	50,109
1992		357,220	\$	(433,131)			\$	(75,911)		(2,191)		(27,993)
1993		371,865	\$	(450,598)			\$	(78,733)		(5,562)	\$	(112,287)
1994		961,569	\$	(454,752)			\$	506,817	\$	(6,833)	\$	387,696
1995		1,463,850	\$	(480,629)			\$	983,221	\$	46,868	\$	1,417,785
1996		1,534,176	\$	(774,350)			\$	759,826	\$	117,204	\$	2,294,816
1997		819,664	\$	(1,219,107)			\$	(399,443)		151,999	\$	2,047,372
1998		2,172,320	\$	(1,208,009)			\$	964,311	\$	156,796	\$	3,168,479
1999		1,823,179	\$	(1,278,599)		(374,473)		170,107	\$	270,510	\$	3,609,096
2000		3,459,202	\$	(1,296,350)		(2,207,298)		(44,446)		239,371	\$	3,804,021
2001	\$	2,756,808	\$	(1,291,238)	\$	(2,198,598)	\$	(733,028)	\$	217,457	\$	3,288,450
Balance		stment									\$	85,468
2002	\$	3,065,237	\$	(1,345,347)	\$	(2,290,723)	\$	(570,833)	\$	180,530	\$	2,983,615
			(\$0).00171)	(\$0.	.00215)						
Balance											\$	44,359
2003	\$	3,673,166		(1,339,800)		(1,684,579)		648,787	\$	201,124	\$	3,877,886
			٠.).00269)	•	.00097) Effe						
2004		4,443,434		(1,467,495)		(1,596,076)		1,379,863	\$	288,077	\$	5,545,826
2005	\$	2,329,518	\$	(2,405,653)		(806,167)		(882,302)	\$	408,611	\$	5,072,135
					•	.00198) Effe						
2006	\$	2,579,470	\$	(2,344,871)		(1,139,650)		(905,051)	\$	409,046	\$	4,576,131
					(0.	00134) Effe						
2007	\$	2,434,193	\$	(2,316,927)	\$	(1,456,026)		(1,338,760)		341,049	\$	3,578,420
					•			October 200				
2008	\$	2,416,354	\$	(2,333,585)		(1,144,320)		(1,061,551)		300,223	\$	2,817,092
					•	•		October 200				
2009		2,205,502		(2,242,003)	\$	(1,120,556)	\$	(1,157,057)		216,580	\$	1,892,411
Carı	rying	Cost Adjust	mer	nt (1)					\$	15,796		
					•			November 2			_	
2010				(2,258,557)		(1,256,104)	\$	(2,150,764)	1.0	31,828	\$	(617,116)
Carı	rying	Cost Adjust	mer	nt 2002-2009					\$	(390,592)		
								November 2				
	_			,	•	•		e February 2			_	/ ·
2011	\$	1,720,282	\$	(2,283,995)		(517,932)		(1,081,646)		(101,389)		(1,800,150)
	_				•			December 2		_	-	
2012	\$	2,819,925	\$	(2,107,650)		504,567		, ,	\$	(110,726)		(694,034)
2212	_		_	(0.400.00=)				November 2		_		
2013	\$	3,539,537	\$	(2,169,337)	\$	1,522,264	\$	2,892,464	\$	10,875	\$	2,209,305
		LOID T					10040			4.37	•	0.000.005
1				ker Account						1 Year	\$	2,209,305
2								January 201	4		\$	2,257,040
3				rough base							\$	(2,147,613)
4				rough CIP fa				2014		-	\$	(73,598)
5	Begi	nning CIP I	rac	ker Account l	∃aıa	nce June 20	14				\$	2,245,134
	CIP	Annual Adj	ust	ment:								
0	D:-			A/I I I £	004	4						700 000 440
6				VH sales for			1	- 4 0044			Φ	798,369,140
7	CIP	Cost Recov	ery	Adjustment:	\$/K	WH beginnir	ig Jur	ne 1, 2014		:	\$	0.00281
										Paga		CIP Factor
	lan '	2014 - Eab 1	201	4 elec actual	ماده	e (kwh) (2)		145,933,334		Base 0.00269		0.00022
				4 forecast sa				188,601,827		0.00269		0.00022
				4 forecast sa				463,833,979		0.00269		0.00022
	Juli	-UIT - DEC /	_U I	- 10150ast Sa	100 (INVVII) (J)		798,369,140	• '	0.00203		0.00201
*	Dron	osed						. 50,555,140	•			
	ιιυρ	USEU										

^{*} Proposed

⁽¹⁾ Carrying Cost Adjustment for 2009. Total now includes 12 months instead of 11 months

⁽²⁾ Carrying Cost Adjustment for 2010. Reflects correction of interest charge from 2002-2009 and identified in 2010. Credit is for interest calculation change from compounding monthly to simple monthly interest without compounding.

⁽³⁾ Excludes Op Out Customer (see Sales Tab)

INTERSTATE POWER and LIGHT COMPANY ELECTRIC TARIFF FILED WITH M.P.U.C.

ORIGINAL VOLUME NO. 8
SUBSTITUTE SIXTEENTH REVISED SHEET NO. 41

Canceling FIFTEENTH REVISED SHEET NO. 41

RATE DESIGNATION: CONSERVATION IMPROVEMENT PROGRAM (CIP)

COST RECOVERY ADJUSTMENT

CLASS OF SERVICE: ALL CLASSES

SERVICE AREA: ALL MINNESOTA SERVICE AREA

APPLICABILITY SECTION

Applicable to bills for electric service under all Retail Rate Schedules:

120, 160, 167, 168, 170, 260, 267, 268, 290, 297, 298, 310, 330, 340, 350, 360, 367, 368, 370, 380, 390, 410, 420, 437, 438, 540

"Large Customer Facility" customers that have been exempted from the Company's Conservation Improvement Program charges pursuant to Minn. Stat. 216B.241, Subd. 1a (b) shall receive a monthly exemption from conservation improvement program charges pursuant to Minn. Stat. 216B.16, subd. 6b Energy Conservation Improvement. Such monthly exemption will be effective beginning January 1 of the year following the grant of exemption. Upon exemption from conservation program charges, the "Large Customer Facility" customers can no longer participate in the Company's Energy Conservation Improvement Program.

RATE DETERMINATION SECTION

CIP COST RECOVERY ADJUSTMENT (CIP)

There shall be added to each non-CIP exempt customer's monthly bill a CIP cost recovery adjustment which shall be the applicable CIP adjustment factor (CCRA) multiplied by the customer's monthly kWh (kilowatt-hour) uses. The applicable CCRA shall be determined annually as described below.

For customer accounts granted exemption by the Commissioner of the Minnesota Department of Commerce, Division of Energy Resources (or successor agency) as a "Large Customer Facility" from CIP costs pursuant to Minn. Stat. 216B.241, the CCRA shall not apply. Customer accounts granted CIP exemption by a decision of the Commissioner after the beginning of a calendar year shall be credited for any CIP collections billed after January 1st of the year following the Commissioner's decision. All credits associated with the CCRA Exemption Adjustment shall be included in the CIP Tracker account.

DETERMINATION OF CCRA

The CCRA shall be the quotient of the Recoverable Tracker balance, divided by projected retail sales (kWh) of all non-CIP exempt customers for a designated 12-month recovery period. The Recoverable Tracker balance shall be determined by adjusting the prior year-end CIP Tracker balance by:

- (1) Adding financial incentives awarded by the Minnesota Public Utilities Commission (or successor agency) not reflected in the prior year-end balance:
- (2) Adding current year CIP program expenditures at their approved and/or budgeted level;
- (3) Subtracting current year CIP cost recovery through base rates as estimated based on Company's budgeted retail sales.

In addition, the prior year-end CIP Tracker account balance shall be increased by the amortization of the beginning CIP Tracker account balance during the next 24 months. All costs appropriately charged to the CIP Tracker account shall be eligible for recovery through this adjustment and all revenues received from the application of the CCRA shall be credited to the CIP tracker account.

CCRA: \$0.00281 per kWh effective October 1, 2014

DETERMINATION OF CONSERVATION COST RECOVERY CHARGE (CCRC)

The CCRC is the amount included in base rates dedicated to the recovery of CIP costs as approved by the Minnesota Public Utilities Commission (or successor agency) in the Company's last general rate case. The CCRC is approved and applied on a per kWh basis by dividing the test-year CIP expenses by the test-year sales volumes (net of CIP-exempt volumes). All revenues received from the CCRC shall be credited to the CIP Tracker account.

CCRC: \$0.00269 per kWh

Date Filed: July 22, 2014 Proposed Effective Date: October 1, 2014

By: Erik C. Madsen - Director, Regulatory Affairs

Docket No. Order Date:

INTERSTATE POWER and LIGHT COMPANY ELECTRIC TARIFF FILED WITH M.P.U.C.

ORIGINAL VOLUME NO. 8

SUBSTITUTE FIFSIX TEENTH REVISED SHEET NO. 41
Canceling FOURIFTEENTH REVISED SHEET NO. 41

RATE DESIGNATION: CONSERVATION IMPROVEMENT PROGRAM (CIP)

COST RECOVERY ADJUSTMENT

CLASS OF SERVICE: ALL CLASSES

SERVICE AREA: ALL MINNESOTA SERVICE AREA

APPLICABILITY SECTION

Applicable to bills for electric service under all Retail Rate Schedules:

120, 160, 167, 168, 170, 260, 267, 268, 290, 297, 298, 310, 330, 340, 350, 360, 367, 368, 370, 380, 390, 410, 420, 437, 438, 540

"Large Customer Facility" customers that have been exempted from the Company's Conservation Improvement Program charges pursuant to Minn. Stat. 216B.241, Subd. 1a (b) shall receive a monthly exemption from conservation improvement program charges pursuant to Minn. Stat. 216B.16, subd. 6b Energy Conservation Improvement. Such monthly exemption will be effective beginning January 1 of the year following the grant of exemption. Upon exemption from conservation program charges, the "Large Customer Facility" customers can no longer participate in the Company's Energy Conservation Improvement Program.

RATE DETERMINATION SECTION

CIP COST RECOVERY ADJUSTMENT (CIP)

There shall be added to each non-CIP exempt customer's monthly bill a CIP cost recovery adjustment which shall be the applicable CIP adjustment factor (CCRA) multiplied by the customer's monthly kWh (kilowatt-hour) uses. The applicable CCRA shall be determined annually as described below.

For customer accounts granted exemption by the Commissioner of the Minnesota Department of Commerce, Division of Energy Resources (or successor agency) as a "Large Customer Facility" from CIP costs pursuant to Minn. Stat. 216B.241, the CCRA shall not apply. Customer accounts granted CIP exemption by a decision of the Commissioner after the beginning of a calendar year shall be credited for any CIP collections billed after January 1st of the year following the Commissioner's decision. All credits associated with the CCRA Exemption Adjustment shall be included in the CIP Tracker account.

DETERMINATION OF CCRA

The CCRA shall be the quotient of the Recoverable Tracker balance, divided by projected retail sales (kWh) of all non-CIP exempt customers for a designated 12-month recovery period. The Recoverable Tracker balance shall be determined by adjusting the prior year-end CIP Tracker balance by:

- (1) Adding financial incentives awarded by the Minnesota Public Utilities Commission (or successor agency) not reflected in the prior year-end balance:
- (2) Adding current year CIP program expenditures at their approved and/or budgeted level;
- (3) Subtracting current year CIP cost recovery through base rates as estimated based on Company's budgeted retail sales.

In addition, the prior year-end CIP Tracker account balance shall be increased by the amortization of the beginning CIP Tracker account balance during the next 24 months. All costs appropriately charged to the CIP Tracker account shall be eligible for recovery through this adjustment and all revenues received from the application of the CCRA shall be credited to the CIP tracker account.

CCRA: \$0.00022281 per kWh effective NovemberOctober 1, 20134

DETERMINATION OF CONSERVATION COST RECOVERY CHARGE (CCRC)

The CCRC is the amount included in base rates dedicated to the recovery of CIP costs as approved by the Minnesota Public Utilities Commission (or successor agency) in the Company's last general rate case. The CCRC is approved and applied on a per kWh basis by dividing the test-year CIP expenses by the test-year sales volumes (net of CIP-exempt volumes). All revenues received from the CCRC shall be credited to the CIP Tracker account.

CCRC: \$0.00269 per kWh

Date Filed: October July 2322, 20134 Proposed Effective Date: October 1, 20134

By: <u>Erik C. Madsen – Director, Regulatory Affairs</u>

Docket No. E-001/M-13-240 Order Date: October 15, 2013