



Alliant Energy Corporate Services, Inc.
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Samantha C. Norris
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Interstate Power and Light Company
An Alliant Energy Company

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May 11, 2015

Mr. Daniel P. Wolf, 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-15-309
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

SCN/kcb
Enclosures

cc: Service List

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 GAS
AFFORDABILITY SERVICE PROGRAM
ANNUAL REPORT

DOCKET NO. G001/M-15-309

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 11th 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 11th day of May, 2015.

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

| 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_15-309_M-15-309 |
| 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_15-309_M-15-309 |
| Christopher | Anderson | canderson@allete.com | Minnesota Power | 30 W Superior St Duluth, MN 558022191 | Electronic Service | No | OFF_SL_15-309_M-15-309 |
| 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_15-309_M-15-309 |
| Michael | Bradley | mike.bradley@lawmoss.com | Moss & Barnett | 150 S. 5th Street, #1200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_15-309_M-15-309 |
| City | Clerk | sschulte@ci.albertlea.mn.us | City of Albert Lea | 221 E Clark St Albert Lea, MN 56007 | Electronic Service | No | OFF_SL_15-309_M-15-309 |
| Daniel R | Culhane | DanielCulhane@alliantenergy.com | Alliant Energy Corporate Services, Inc. | 4902 North Biltmore Ln Madison, WI 53718-2148 | Electronic Service | No | OFF_SL_15-309_M-15-309 |
| Ian | Dobson | ian.dobson@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_15-309_M-15-309 |
| 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_15-309_M-15-309 |
| Michael | Greiveldinger | michaelgreiveldinger@alliantenergy.com | Interstate Power and Light Company | 4902 N. Biltmore Lane Madison, WI 53718 | Electronic Service | No | OFF_SL_15-309_M-15-309 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|----------------------------------|--|--|--------------------|-------------------|------------------------|
| David | Grover | dgrover@itctransco.com | ITC Midwest | 901 Marquette Avenue Suite 1950 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_15-309_M-15-309 |
| Annete | Henkel | mui@mutilityinvestors.org | Minnesota Utility Investors | 413 Wacouta Street #230 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_15-309_M-15-309 |
| 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_15-309_M-15-309 |
| Jim | Krueger | jkrueger@fmcs.coop | Freeborn-Mower Cooperative Services | Box 611 Albert Lea, MN 56007 | Electronic Service | No | OFF_SL_15-309_M-15-309 |
| 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_15-309_M-15-309 |
| Kavita | Maini | kmaini@wi.rr.com | KM Energy Consulting LLC | 961 N Lost Woods Rd Oconomowoc, WI 53066 | Electronic Service | No | OFF_SL_15-309_M-15-309 |
| Pam | Marshall | pam@energycents.org | Energy CENTS Coalition | 823 7th St E St. Paul, MN 55106 | Electronic Service | No | OFF_SL_15-309_M-15-309 |
| David | Moeller | dmoeller@allete.com | Minnesota Power | 30 W Superior St Duluth, MN 558022093 | Electronic Service | No | OFF_SL_15-309_M-15-309 |
| Carl | Nelson | cnelson@mncee.org | Center for Energy and Environment | 212 3rd Ave N Ste 560 Minneapolis, MN 55401 | Electronic Service | No | OFF_SL_15-309_M-15-309 |
| Samantha | Norris | samanthanorris@alliantenergy.com | Alliant Energy | 200 1st Street SE PO Box 351 Cedar Rapids, IA 52406-0351 | Electronic Service | No | OFF_SL_15-309_M-15-309 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|----------------|-------------------------------|---|---|--------------------|-------------------|------------------------|
| Steven | Nyhus | swnyhus@flaherty-hood.com | Flaherty & Hood PA | 525 Park St Ste 470 Saint Paul, MN 55103 | Electronic Service | No | OFF_SL_15-309_M-15-309 |
| Richard | Savelkoul | rsavelkoul@martinsquires.com | Martin & Squires, P.A. | 332 Minnesota Street Ste W2750 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_15-309_M-15-309 |
| Larry L. | Schedin | Larry@LLSResources.com | LLS Resources, LLC | 12 S 6th St Ste 1137 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_15-309_M-15-309 |
| 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_15-309_M-15-309 |
| 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_15-309_M-15-309 |
| Robyn | Woeste | robynwoeste@alliantenergy.com | Interstate Power and Light Company | 200 First St SE Cedar Rapids, IA 52401 | Electronic Service | No | OFF_SL_15-309_M-15-309 |
| 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_15-309_M-15-309 |

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

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|--|---------------------------------|
| IN THE MATTER OF INTERSTATE POWER AND LIGHT COMPANY'S GAS AFFORDABILITY SERVICE PROGRAM ANNUAL REPORT | DOCKET NO. G001/M-15-309 |
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**INTERSTATE POWER AND LIGHT COMPANY'S
REPLY COMMENTS**

COMES NOW, Interstate Power and Light Company (IPL), and respectfully submits to the Minnesota Public Utilities Commission (Commission) its Reply Comments in response to the Minnesota Department of Commerce, Division of Energy Resources' (Department) Comments filed with the Commission on April 30, 2015, in the above-referenced docket.

I. BACKGROUND INFORMATION

On March 31, 2015, IPL filed with the Commission its Gas Affordability Service Program Annual Report.

On April 30, 2015, the Department filed Comments requesting that IPL file information pursuant to the Commission's December 29, 2011, *Order Accepting Gas Affordability Program Reports and Requiring Further Action* (Order), which directs utilities to do the following:

- Implement an application processing goal of processing ninety-five percent of all complete gas affordability program applications within 30 days of receipt by the utility, beginning in the 2012 gas affordability program year.
- Assess periodically whether their gas affordability programs could be more effective and efficient by the use of a third-party administrator. Utilities that already use a third-party to administer their programs shall assess periodically whether this is the most effective and efficient arrangement, including a review of alternatives.
- Require its third-party administrator to make GAP applications available electronically on the administrator's websites as a condition of being the third-party administrator for the program.
- Call or mail reminders to its GAP customers after one missed payment to reduce the number of customers removed from the GAP due to missing two consecutive monthly payments.
- Cross-promote its GAP with other bill payment and conservation assistance programs.

IPL's provides the following Reply Comments addressing these Order points below.

II. REPLY COMMENTS

A. Application Processing Goal

In the calendar year 2014, all applications were processed within 30 days of receipt. Applications are dated and numbered, and customers are contacted when an opening becomes available.

B. Evaluation of Third-Party Administrator

IPL used SEMCAC as its third-party administrator from 2008 until 2012, until SEMCAC indicated it no longer wished to participate due to budget constraints. IPL then brought the GAP administrator duties in-house. In 2014, SEMCAC, however, continued to provide and forward inquiries from interested gas customers to IPL.

C. Availability of GAP Applications

As stated above, IPL did not use a third-party administrator for GAP in 2014. IPL promoted the GAP program during outbound calls to past due gas customers, when openings were available.

D. Reminders After One Missed Payment

In 2014 IPL sent a "Removal Warning Letter" as a reminder of the payment requirements for the program. A total of eleven past due GAP customers received "Removal Warning Letters" in 2014. In 2014, six customers were removed from GAP due to failure to make their scheduled payments. Attachment A is an example of the letter.

E. Cross-Promotion of GAP

In 2014, IPL included information regarding GAP on its website, and offered GAP to customers during outbound collection calls, if openings were available. With the sale of the natural gas retail business to Minnesota Energy Resources (MERC), effective April 30, 2015, GAP information was forwarded to MERC, which included the customer's name, account number, mailing address, telephone number, 12-month usage data and account balance. This information will be used by MERC to process IPL's former GAP customers.

WHEREFORE, IPL requests the Commission accept IPL's Reply Comments in this docket.

DATED this 11th day of May, 2015.

Respectfully submitted,

INTERSTATE POWER AND LIGHT COMPANY

By /s/ Samantha C. Norris
Samantha C. Norris
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Interstate Power and Light, an Alliant Energy Company

Questions? Call 1-800-327-2708

| | |
|-----------------|----------------|
| NAME | ACCOUNT NUMBER |
| SERVICE ADDRESS | BILL DATE |

- REMOVAL WARNING-

YOU ARE CURRENTLY ENROLLED IN THE GAS AFFORDABILITY PROGRAM THROUGH ALLIANT ENERGY-INTERSTATE POWER AND LIGHT. UNFORTUNATELY YOU HAVE NOT SUCCESSFULLY MAINTAINED THE ARRANGEMENTS AGREED UPON WHEN YOU ENTERED THE PROGRAM.

IN ORDER TO REMAIN IN THE PROGRAM YOU WILL NEED TO MAKE A PAYMENT OF \$218.87.

YOUR PAYMENTS WERE BASED ON YOUR ABILITY TO MEET THE ARRANGEMENTS ACCORDING TO YOUR FINANCIAL CIRCUMSTANCES. IF YOU ARE REMOVED FROM THE PROGRAM FOR FAILURE TO MAKE YOUR PAYMENTS, DUE TO LIMITED SPACE AVAILABILITY, YOU WILL NOT BE ELIGIBLE TO RE-ENTER THE PROGRAM.

WE HOPE THAT BY WORKING TOGETHER WE CAN REDUCE THE AMOUNT OWED AND PROVIDE NECESSARY ASSISTANCE TO ELIMINATE YOUR ENERGY BURDEN. IF YOU DO NOT FOLLOW THE AGREED UPON ARRANGEMENTS, YOU WILL BE REMOVED FROM THE PROGRAM AND COULD BE SUBJECT TO DISCONNECTION OF YOUR UTILITIES.

IF YOU HAVE ANY QUESTIONS, PLEASE CALL 1-800-255-4268

000007 1/1



AMOUNT NOW DUE \$218.87

KEEP THIS PORTION FOR YOUR RECORDS

PLEASE ALLOW FIVE BUSINESS DAYS FOR MAILING AND PROCESSING

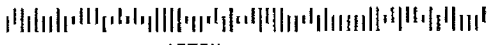


ACCOUNT NUMBER

AMOUNT DUE ON OR BEFORE MAY 23, 2013

\$218.87

| |
|--|
| AMOUNT ENCLOSED (IF DIFFERENT FROM ABOVE) |
|--|



AE-B

ALLIANT ENERGY
PO BOX 3066
CEDAR RAPIDS IA 52406-3066