



Alliant Energy Corporate Services  
Legal Department  
319.786.4742 Telephone  
319.786.4533 – Fax

Paula N. Johnson  
Senior Attorney - Regulatory

February 28, 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. G001/M-13-324  
Supplemental Reply Comments

Dear Dr. Haar:

Enclosed for eFiling with the Minnesota Public Utilities Commission (Commission), please find Interstate Power and Light Company's (IPL) *Supplemental Reply Comments* in the above-captioned docket.

On January 27, 2014, IPL filed *Reply Comments* addressing the Minnesota Department of Commerce, Division of Energy Resource's (Department) December 19, 2013 *Comments* requesting additional information regarding involuntary service disconnections.

Commission Staff recently brought to IPL's attention a discrepancy in the number of disconnection notices sent to customers reported in its 2012 Annual Gas Service Quality Report filed with the Commission on May 1, 2013, and its 2012 Annual Safety, Reliability, and Service Quality Report and Proposed SAIFI, SAIDI and CAIDI Indices for 2013 filed on April 1, 2013. In reviewing the data, IPL discovered that several months included residential disconnect notices only and should have included "total" notices mailed. The attached Second Corrected Appendix A now includes residential, commercial, industrial and rural notices. IPL apologizes for any confusion it may have caused. Additionally, IPL is concurrently making a companion filing in Docket No. E001/M-13-249.

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  
Senior Attorney - Regulatory

PNJ/tao  
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  
David C. Boyd  
Nancy Lange  
Dan Lipschultz  
Betsy Wergin**

**Chair  
Commissioner  
Commissioner  
Commissioner  
Commissioner**

---

**IN THE MATTER OF INTERSTATE  
POWER AND LIGHT COMPANY –  
GAS – 2012 ANNUAL SERVICE  
QUALITY REPORTS**

**DOCKET NO. G001/M-13-324**

---

**AFFIDAVIT OF SERVICE**

STATE OF IOWA            )  
  ) ss.  
COUNTY OF LINN        )

Tonya A. O'Rourke, being first duly sworn on oath, deposes and states:

That on the 28<sup>th</sup> day of February, 2014, copies of the foregoing Affidavit of Service, together with Interstate Power and Light Company's Supplemental Reply Comments, were served upon the parties on the attached service list, by e-filing, messenger, electronic mail, facsimile and/or first-class mail, proper postage prepaid from Cedar Rapids, Iowa.

          /s/ Tonya A. O'Rourke            
Tonya A. O'Rourke

Subscribed and Sworn to Before Me  
this 28<sup>th</sup> day of February, 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@conagrafoods.com   | ConAgra                            | Suite 5022<br>11 ConAgra Drive<br>Omaha,<br>NE<br>68102   | Electronic Service | No                | OFF_SL_13-324_M-13-324 |
| Julia       | Anderson  | Julia.Anderson@ag.state.mn.us | Office of the Attorney General-DOC | 1800 BRM Tower<br>445 Minnesota St<br>St. Paul,<br>MN<br>551012134                                    | Electronic Service | Yes               | OFF_SL_13-324_M-13-324 |
| Christopher | Anderson  | canderson@allete.com          | Minnesota Power                    | 30 W Superior St<br><br>Duluth,<br>MN<br>558022191  | Electronic Service | No                | OFF_SL_13-324_M-13-324 |
| William A.  | Blazar    | bblazar@mnchamber.com         | Minnesota Chamber Of Commerce      | Suite 1500<br>400 Robert Street North<br>St. Paul,<br>MN<br>55101                                     | Electronic Service | No                | OFF_SL_13-324_M-13-324 |
| Michael     | Bradley   | mike.bradley@lawmoss.com      | Moss & Barnett                     | Suite 4800<br>90 S 7th St<br>Minneapolis,<br>MN<br>55402-4129   | Electronic Service | No                | OFF_SL_13-324_M-13-324 |
| City        | Clerk     | sschulte@ci.albertlea.org     | City of Albert Lea                 | 221 E Clark St<br><br>Albert Lea,<br>MN<br>56007  | Paper Service      | No                | OFF_SL_13-324_M-13-324 |
| Ian         | Dobson    | ian.dobson@ag.state.mn.us     | Office of the Attorney General-RUD | Antitrust and Utilities<br>Division<br>445 Minnesota Street,<br>BRM Tower<br>St. Paul,<br>MN<br>55101 | Electronic Service | No                | OFF_SL_13-324_M-13-324 |
| Sharon      | Ferguson  | sharon.ferguson@state.mn.us   | Department of Commerce             | 85 7th Place E Ste 500<br><br>Saint Paul,<br>MN<br>551012198  | Electronic Service | No                | OFF_SL_13-324_M-13-324 |
| David       | Grover    | dgrover@itctransco.com        | ITC Midwest                        | 444 Cedar St Ste 1020<br><br>Saint Paul,<br>MN<br>55101-2129  | Electronic Service | No                | OFF_SL_13-324_M-13-324 |
| Burl W.     | Haar      | burl.haar@state.mn.us         | Public Utilities Commission        | Suite 350<br>121 7th Place East<br>St. Paul,<br>MN<br>551012147                                       | Electronic Service | Yes               | OFF_SL_13-324_M-13-324 |

| 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<br>#230<br>St. Paul,<br>MN<br>55101                     | Electronic Service | No                | OFF_SL_13-324_M-13-324 |
| Linda      | Jensen    | linda.s.jensen@ag.state.mn.us | Office of the Attorney General-DOC                | 1800 BRM Tower 445<br>Minnesota Street<br><br>St. Paul,<br>MN<br>551012134 | Electronic Service | No                | OFF_SL_13-324_M-13-324 |
| Jim        | Krueger   | jkrueger@fmcs.coop            | Freeborn-Mower Cooperative Services               | Box 611<br><br>Albert Lea,<br>MN<br>56007                                  | Electronic Service | No                | OFF_SL_13-324_M-13-324 |
| John       | Lindell   | agorud.ecf@ag.state.mn.us     | Office of the Attorney General-RUD                | 1400 BRM Tower<br>445 Minnesota St<br>St. Paul,<br>MN<br>551012130         | Electronic Service | Yes               | OFF_SL_13-324_M-13-324 |
| Kavita     | Maini     | kmains@wi.rr.com              | KM Energy Consulting LLC                          | 961 N Lost Woods Rd<br><br>Oconomowoc,<br>WI<br>53066                      | Electronic Service | No                | OFF_SL_13-324_M-13-324 |
| Pam        | Marshall  | pam@energycents.org           | Energy CENTS Coalition                            | 823 7th St E<br><br>St. Paul,<br>MN<br>55106                               | Electronic Service | No                | OFF_SL_13-324_M-13-324 |
| David      | Moeller   | dmoeller@allete.com           | Minnesota Power                                   | 30 W Superior St<br><br>Duluth,<br>MN<br>558022093                         | Electronic Service | No                | OFF_SL_13-324_M-13-324 |
| Carl       | Nelson    | cnelson@mncee.org             | Center for Energy and Environment                 | 212 3rd Ave N Ste 560<br><br>Minneapolis,<br>MN<br>55401                   | Electronic Service | No                | OFF_SL_13-324_M-13-324 |
| Steven     | Nyhus     | swnyhus@flaherty-hood.com     | Flaherty & Hood PA                                | 525 Park St Ste 470<br><br>Saint Paul,<br>MN<br>55103                      | Electronic Service | No                | OFF_SL_13-324_M-13-324 |
| Kent       | Ragsdale  | kentagsdale@alliantenergy.com | Alliant Energy-Interstate Power and Light Company | P.O. Box 351<br>200 First Street, SE<br>Cedar Rapids,<br>IA<br>524060351   | Electronic Service | No                | OFF_SL_13-324_M-13-324 |

| First Name | Last Name      | Email                         | Company Name                            | Address   | Delivery Method    | View Trade Secret | Service List Name      |
|------------|----------------|-------------------------------|---|---|--------------------|-------------------|------------------------|
| Richard    | Savelkoul      | rsavelkoul@martinsquires.com  | Martin & Squires, P.A.                  | 332 Minnesota Street Ste W2750<br><br>St. Paul, MN 55101        | Electronic Service | No                | OFF_SL_13-324_M-13-324 |
| Larry L.   | Schedin        | Larry@LLSResources.com        | LLS Resources, LLC                      | 12 S 6th St Ste 1137<br><br>Minneapolis, MN 55402               | Electronic Service | No                | OFF_SL_13-324_M-13-324 |
| Matthew J. | Schuerger P.E. | mjsreg@earthlink.net          | Energy Systems Consulting Services, LLC | PO Box 16129<br><br>St. Paul, MN 55116                          | Electronic Service | No                | OFF_SL_13-324_M-13-324 |
| Ron        | Spangler, Jr.  | rlspangler@otpc.com           | Otter Tail Power Company                | 215 So. Cascade St.<br>PO Box 496<br>Fergus Falls, MN 565380496 | Electronic Service | No                | OFF_SL_13-324_M-13-324 |
| Robyn      | Woeste         | robynwoeste@alliantenergy.com | Interstate Power and Light Company      | 200 First St SE<br><br>Cedar Rapids, IA 52401                   | Electronic Service | No                | OFF_SL_13-324_M-13-324 |

Minnesota Cold Weather Rule Summary Report  
as filed per Minn. Stat. §§ 216B.091

|   | Jan-12 | Feb-12 | Mar-12 | Apr-12 | May-12 | Jun-12 | Jul-12 | Aug-12 | Sep-12 | Oct-12 | Nov-12 | Dec-12 |
|---|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|
| 1 Number of Residential Customer Accounts:                  | 44,001 | 43,970 | 43,934 | 43,919 | 44,032 | 43,845 | 43,855 | 43,834 | 43,821 | 43,856 | 43,887 | 43,917 |
| 2 Number of Past Due Residential Customer Accounts:         | 7,987  | 7,181  | 7,450  | 7,332  | 6,381  | 6,964  | 6,946  | 8,092  | 8,077  | 8,222  | 7,740  | 7,924  |
| 3 Number of Cold Weather Protection Requests:               | 557    | 319    | 484    | 255    |        |        |        |        |        | 159    | 2,017  | 1,537  |
| <b>RECONNECTION AT BEGINNING OF COLD WEATHER MONTHS</b>     |        |        |        |        |        |        |        |        |        |        |        |        |
| 4 Number of "Right to Appeal" notices mailed to customers:  | 0      | 0      | 0      | 0      |        |        |        |        |        | 0      | 0      | 0      |
| 5 <i>Intentionally Blank</i>                                |        |        |        |        |        |        |        |        |        |        |        |        |
| 6 Number of customer accounts granted reconnection request: | 2      | 40     | 11     | 12     |        |        |        |        |        | 34     | 11     | 8      |

**INABILITY TO PAY (ITP)**

**10% PLAN (TPP)**

# IPL 2012 Gas Service Quality Report

## Interstate Power & Light Company Gas Service Quality Report

# Second Corrected Appendix A

Minnesota Cold Weather Rule Summary Report  
as filed per Minn. Stat. §§ 216B.091

|                              | Jan-12  | Feb-12 | Mar-12 | Apr-12 | May-12 | Jun-12 | Jul-12 | Aug-12 | Sep-12 | Oct-12 | Nov-12 | Dec-12 |
|------------------------------|---|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|
| <b>PAYMENT SCHEDULE (PS)</b> |   |        |        |        |        |        |        |        |        |        |        |        |
| 16                           | Number of "Right to Appeal" notices mailed to customers:  |        |        |        |        |        |        |        |        |        |        |        |
|                              | 0   | 0      | 0      | 0      | 0      | 0      | 0      | 0      | 0      | 0      | 0      | 0      |
| a)                           | Number of PS requests received  |        |        |        |        |        |        |        |        |        |        |        |
|                              | 104   | 74     | 324    | 122    |        |        |        |        |        | 125    | 951    | 40     |
| 17                           | <i>Intentionally Blank</i>  |        |        |        |        |        |        |        |        |        |        |        |
| 18                           | Number of PS negotiations mutually agreed upon:   |        |        |        |        |        |        |        |        |        |        |        |
|                              | 104   | 74     | 324    | 122    |        |        |        |        |        | 125    | 951    | 40     |
| 19                           | <i>Intentionally Blank</i>  |        |        |        |        |        |        |        |        |        |        |        |
| <b>DISCONNECTIONS</b>        |   |        |        |        |        |        |        |        |        |        |        |        |
| 20                           | Number of disconnection notices mailed to customers:  |        |        |        |        |        |        |        |        |        |        |        |
|                              | 3,846   | 2,603  | 2,783  | 3,258  | 2,767  | 2,614  | 3,029  | 4,162  | 3,973  | 4,284  | 2,844  | 3,308  |
| 21                           | Number of customer accounts disconnected who did not seek protection:   |        |        |        |        |        |        |        |        |        |        |        |
|                              | Duplicate columns for use in Apr and Oct<br>April 1-15 and October 1-15 in 1st column<br><i>All other months, use 1st column only</i> |        |        |        |        |        |        |        |        |        |        |        |
| a)                           | 9   | 39     | 24     | 15     | 104    | 60     | 58     | 49     | 48     | 31     | 9      | 12     |
| b)                           | # Electric - heat not affected  |        |        |        |        |        |        |        |        |        |        |        |
| c)                           | 1   | 1      |        |        | 2      | 1      | 1      |        | 1      |        |        |        |
| d)                           | # Gas - heat not affected   |        |        |        |        |        |        |        |        |        |        |        |
| e)                           | 10  | 40     | 24     | 15     | 106    | 61     | 59     | 49     | 49     | 31     | 9      | 12     |
|                              | <i>April 16-30 and October 16-31 in 2nd column<br/>All other months, use 1st column only</i>  |        |        |        |        |        |        |        |        |        |        |        |
| a)                           |   |        |        | 27     |        |        |        |        |        | 11     |        |        |
| b)                           | # Electric - heat not affected  |        |        |        |        |        |        |        |        |        |        |        |
| c)                           | # Gas - heat affected   |        |        |        |        |        |        |        |        |        |        |        |
| d)                           | # Gas - heat not affected   |        |        |        |        |        |        |        |        |        |        |        |
| e)                           | 0   | 0      | 0      | 27     | 0      | 0      | 0      | 0      | 0      | 11     | 0      | 0      |
| 22                           | Number of customer accounts disconnected seeking protection:  |        |        |        |        |        |        |        |        |        |        |        |
| a)                           | 0   | 0      | 0      | 0      | 0      | 0      | 0      | 0      | 0      | 0      | 0      | 0      |
| b)                           | # Electric - heat not affected  |        |        |        |        |        |        |        |        |        |        |        |
| c)                           | 0   | 0      | 0      | 0      | 0      | 0      | 0      | 0      | 0      | 0      | 0      | 0      |
| d)                           | # Gas - heat not affected   |        |        |        |        |        |        |        |        |        |        |        |
| e)                           | 0   | 0      | 0      | 0      | 0      | 0      | 0      | 0      | 0      | 0      | 0      | 0      |
|                              | <i>NOTE: Please report immediately the names and addresses of customers whose service has been disconnected more than 24 hours.</i>   |        |        |        |        |        |        |        |        |        |        |        |
| 23                           | Number of customer accounts disconnected for nonpayment (auto-calculation of #21e+ #22e):   |        |        |        |        |        |        |        |        |        |        |        |
|                              | 10  | 40     | 24     | 42     | 106    | 61     | 59     | 49     | 49     | 42     | 9      | 12     |

# IPL 2012 Gas Service Quality Report

## Interstate Power & Light Company Gas Service Quality Report

# Second Corrected Appendix A

Minnesota Cold Weather Rule Summary Report  
as filed per Minn. Stat. §§ 216B.091

|                               | Jan-12   | Feb-12      | Mar-12      | Apr-12      | May-12      | Jun-12      | Jul-12      | Aug-12      | Sep-12      | Oct-12      | Nov-12      | Dec-12      |
|-------------------------------|--|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| <b>DOLLAR VALUE</b>           |  |             |             |             |             |             |             |             |             |             |             |             |
| 24                            | <b>Total</b> dollars past due on all residential accounts:   |             |             |             |             |             |             |             |             |             |             |             |
|                               | \$1,211,369  | \$1,230,485 | \$1,289,095 | \$1,148,474 | \$698,275   | \$747,409   | \$831,191   | \$1,131,218 | \$1,148,421 | \$1,127,047 | \$1,058,028 | \$1,060,652 |
| 25                            | <b>Average</b> past due dollar amount per past due account (auto-calculation of #24 ÷ #2):                                       |             |             |             |             |             |             |             |             |             |             |             |
|                               | \$152  | \$171       | \$173       | \$157       | \$109       | \$107       | \$120       | \$140       | \$142       | \$137       | \$137       | \$134       |
| 26                            | <b>Total</b> dollars received from energy assistance programs:   |             |             |             |             |             |             |             |             |             |             |             |
|                               | \$95,952   | \$124,602   | \$72,910    | \$88,459    | \$90,572    | \$28,386    | \$28,386    | \$0         | \$0         | \$0         | \$80,093    | \$126,847   |
| 27                            | <b>Total</b> dollars received from other sources (private organizations):  |             |             |             |             |             |             |             |             |             |             |             |
|                               | \$0  | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         |
| 28                            | <b>Total</b> Revenue from sales to residential accounts:   |             |             |             |             |             |             |             |             |             |             |             |
|                               | \$4,417,360  | \$3,952,151 | \$3,276,924 | \$2,535,216 | \$2,539,325 | \$2,927,994 | \$4,505,588 | \$4,508,814 | \$3,665,546 | \$2,809,970 | \$2,912,430 | \$3,709,324 |
| 29                            | <b>Average</b> monthly residential bill: (auto-calculation of #28 ÷ #1)  |             |             |             |             |             |             |             |             |             |             |             |
|                               | \$100  | \$90        | \$75        | \$58        | \$58        | \$67        | \$103       | \$103       | \$84        | \$64        | \$66        | \$84        |
| 30                            | <i>Intentionally Blank</i>   |             |             |             |             |             |             |             |             |             |             |             |
| 30                            | <b>Average</b> annual residential bill:  |             |             |             |             |             |             |             |             |             |             |             |
| 31                            | <b>Total</b> residential account write-offs due to uncollectible:  |             |             |             |             |             |             |             |             |             |             |             |
|                               | \$36,129   | \$27,137    | \$19,599    | \$22,480    | \$19,743    | \$22,091    | \$44,274    | \$34,618    | \$26,972    | \$41,905    | \$31,848    | \$23,573    |
| <b>DISCONNECTION DURATION</b> |  |             |             |             |             |             |             |             |             |             |             |             |
| 32                            | Number of customer accounts disconnected 24 hours or more:   |             |             |             |             |             |             |             |             |             |             |             |
| a)                            | # Electric - heat affected   |             |             |             |             |             |             |             |             |             |             |             |
|                               | 0  | 17          | 12          | 9           |             |             |             |             |             | 13          | 2           | 6           |
| b)                            | # Electric - heat not affected   |             |             |             |             |             |             |             |             |             |             |             |
|                               |  |             |             |             |             |             |             |             |             |             |             |             |
| c)                            | # Gas - heat affected  |             |             |             |             |             |             |             |             |             |             |             |
|                               |  |             |             |             |             |             |             |             |             |             |             |             |
| d)                            | # Gas - heat not affected  |             |             |             |             |             |             |             |             |             |             |             |
|                               |  |             |             |             |             |             |             |             |             |             |             |             |
| e)                            | <b>Total # disconnected</b>  |             |             |             |             |             |             |             |             |             |             |             |
|                               | 0  | 17          | 12          | 9           | 0           | 0           | 0           | 0           | 0           | 13          | 2           | 6           |
| 33                            | <i>Intentionally Blank</i>   |             |             |             |             |             |             |             |             |             |             |             |
| 34                            | Number occupied heat-affected accounts disconnected 24 hours or more (to include customers who did and did not seek protection). |             |             |             |             |             |             |             |             |             |             |             |
|                               |  |             |             | 0           | 0           | 0           | 0           | 0           | 0           | 0           | 0           | 0           |
| 35                            | <i>Intentionally Blank</i>   |             |             |             |             |             |             |             |             |             |             |             |
| 36                            | <i>Intentionally Blank</i>   |             |             |             |             |             |             |             |             |             |             |             |
| <b>RECONNECTION DATA</b>      |  |             |             |             |             |             |             |             |             |             |             |             |
| 37                            | # Accounts reconnected   |             |             |             |             |             |             |             |             |             |             |             |
|                               | 6  | 21          | 12          | 12          | 59          | 37          | 18          | 26          | 32          | 34          | 11          | 8           |
| 38                            | # Accounts remaining disconnected  |             |             |             |             |             |             |             |             |             |             |             |
|                               | 55   | 64          | 73          | 91          | 100         | 98          | 117         | 111         | 119         | 98          | 87          | 78          |
| a)                            | 1-30 days  |             |             |             |             |             |             |             |             |             |             |             |
|                               | 4  | 13          | 16          | 28          | 34          | 11          | 31          | 14          | 18          | 2           | 4           | 0           |
| b)                            | 31-60 days   |             |             |             |             |             |             |             |             |             |             |             |
|                               | 0  | 2           | 10          | 11          | 10          | 19          | 10          | 23          | 10          | 8           | 3           | 2           |
| c)                            | 61+ days   |             |             |             |             |             |             |             |             |             |             |             |
|                               | 51   | 49          | 47          | 52          | 56          | 68          | 76          | 74          | 91          | 88          | 80          | 76          |