

Alliant Energy Corporate Services, Inc. Legal Department Telephone – 319-786-4236

Samantha C. Norris Senior Attorney

March 31, 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. E001/M-15-

Gas Affordability Service Program Annual Report

Dear Mr. Wolf:

Enclosed for e-filing with the Minnesota Public Utilities Commission please find Interstate Power and Light Company's Gas Affordability Service Program Annual Report 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

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 Chair
Nancy Lange Commissioner
Dan Lipschultz Commissioner
John Tuma Commissioner
Betsy Wergin Commissioner

IN THE MATTER OF INTERSTATE POWER AND LIGHT COMPANY'S GAS AFFORDABILITY SERVICE PROGRAM ANNUAL REPORT

DOCKET NO. G001/M-15-___

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 31st day of March, 2015, copies of the foregoing Affidavit of Service, together with Interstate Power and Light Company's Gas Affordability Service Program Annual Report, 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 31st day of March, 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@conagrafood s.com	ConAgra	Suite 5022 11 ConAgra Drive Omaha, NE 68102	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
Julia	Anderson	Julia.Anderson@ag.state.m n.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
William A.	Blazar	bblazar@mnchamber.com		GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List			
Michael	Bradley	mike.bradley@lawmoss.co m	Moss & Barnett	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
City	Clerk	sschulte@ci.albertlea.mn.u s	City of Albert Lea	221 E Clark St Albert Lea, MN 56007	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
lan	Dobson	ian.dobson@ag.state.mn.u s	Office of the Attorney General-RUD	Antitrust and Utilities Division 445 Minnesota Street, BRM Tower St. Paul, MN 55101	Electronic Service 1400	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
Sharon	Ferguson	sharon.ferguson@state.mn .us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
Michael	Greiveldinger	michaelgreiveldinger@allia ntenergy.com	Interstate Power and Light Company	4902 N. Biltmore Lane Madison, WI 53718	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
David	Grover	dgrover@itctransco.com	ITC Midwest	901 Marquette Avenue Suite 1950 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
Linda	Jensen	linda.s.jensen@ag.state.m n.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
Jim	Krueger	jkrueger@fmcs.coop	Freeborn-Mower Cooperative Services	Box 611 Albert Lea, MN 56007	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
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	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
Samantha	Norris	samanthanorris@alliantene rgy.com	Alliant Energy	200 1st Street SE PO Box 351 Cedar Rapids, IA 52406-0351	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
Steven	Nyhus	swnyhus@flaherty- hood.com	Flaherty & Hood PA	525 Park St Ste 470 Saint Paul, MN 55103	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List

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 St. Paul, MN 55101	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	12 S 6th St Ste 1137 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
Matthew J.	Schuerger P.E. mjsreg@earthlink.net		Energy Systems Consulting Services, LLC	PO Box 16129 St. Paul, MN 55116	Electronic Service No		GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
Ron	Spangler, Jr. rlspangler@otpco.com Ott		Otter Tail Power Company	215 So. Cascade St. PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
Robyn	Woeste	robynwoeste@alliantenerg y.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List

STATE OF MINNESOTA BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger Chair
Nancy Lange Commissioner
Dan Lipschultz Commissioner
John Tuma Commissioner
Betsy Wergin Commissioner

IN THE MATTER OF INTERSTATE POWER AND LIGHT COMPANY'S GAS AFFORDABILITY SERVICE PROGRAM ANNUAL REPORT

DOCKET NO. G001/M-15-

SUMMARY OF FILING

Please take notice that on March 31, 2015, Interstate Power and Light Company filed with the Minnesota Public Utilities Commission, pursuant to Minnesota Rules Part 7829.1300, its Gas Affordability Service Program Annual Report.

STATE OF MINNESOTA

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger Chair
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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-___

INTERSTATE POWER AND LIGHT COMPANY'S GAS AFFORDABILITY SERVICE PROGRAM ANNUAL REPORT

COMES NOW, Interstate Power and Light Company (IPL or Company) and, pursuant to its Gas Affordability Service Program (GAP or Program) tariff, files its Gas Affordability Service Program Annual Report (Annual Report). In support of its Annual Report, IPL submits the following:

I. PROCEDURAL MATTERS

A. <u>Summary of Filing</u>

A one-paragraph summary of the filing accompanies this Annual Report pursuant to Minn. Rules Part 7829.1300, subp. 1.

B. Service on Other Parties

Pursuant to Minn. Rules pt. 7829.1300, subp. 2, IPL has served a copy of this Annual Report on the Minnesota Department of Commerce, Division of Energy Resources, the Minnesota Office of the Attorney General-Residential and

Small Business Utilities Division and a summary of this filing on all parties on IPL's miscellaneous electric service list.

C. General Filing Information

Pursuant to Minn. Rules Part 7829.1300, subp. 3, IPL provides the following required information.

1. Name, Address, and Telephone Number of Utility

Interstate Power and Light Company Alliant Tower 200 First Street S.E. P.O. Box 351 Cedar Rapids, Iowa 52406-0351 (319) 786-4268

2. Name, Address, and Telephone Number of Utility Attorney

Samantha C. Norris Senior Attorney Interstate Power and Light Company 200 First Street S.E. P.O. Box 351 Cedar Rapids, Iowa 52406-0351 (319) 786-4236

3. Date of Filing

This Annual Report is being filed on March 31, 2015. IPL proposes that the Commission accept IPL's Annual Report as compliance with IPL's GAP tariffs.

4. Statute Controlling Schedule for Processing the Filing

The Annual Report is submitted in accordance with Docket No. G001/M-07-1295. On January 28, 2008, the Minnesota Public Utilities Commission (Commission) issued its Order Approving Petition with Modifications, approving

IPL's GAP tariffs as modified. The Commission specifically ordered IPL to alter its GAP tariffs to require an annual report.

On February 25, 2008, the Commission issued its *Order Delaying Tariff Effective Date, Adjusting Program Cost Cap, and Requiring Compliance Filing.*This Order required IPL to initiate its GAP on March 1, 2008. IPL initiated its GAP as ordered by the Commission.

On July 8, 2009, the Commission issued its *Order Regarding Interim Review of Gas Affordability Programs Pursuant to Minn. Stat.* § 216B.16, Subd. 15, which clarified certain aspects of administrative cost recovery and required compliance filings regarding enrollment practices.

On August 14, 2009, the Commission issued it *Notice of Extended Comment Period and Comment Period on Additional Issues*. This Notice specifically sought comments on additional questions regarding GAP programs.

On November 18, 2009, the Commission issued its *Order Accepting Compliance Filings Regarding Gas Affordability Programs and Requiring Further Action*. In the Findings and Conclusions of that Order, the Commission further defined reporting requirements for GAP programs.

On September 25, 2013, the Commission issued its *Order Accepting Gas Affordability Program Reports*, which established a list of additional reporting requirements in the form of a summary schedule.

On November 26, 2014, the Commission issued its *Order Accepting Gas*Affordability Program Annual Reports accepting the GAP annual reports and directing all utilities that have gas affordability programs to file their future annual

GAP reports and future GAP evaluation reports as new miscellaneous filings for each new initial filing subject to the Commission's Rules of Practice and Procedure.

5. Utility Employees Responsible for Filing

Samantha C. Norris Senior Attorney Interstate Power and Light Company 200 First Street S.E. P.O. Box 351 Cedar Rapids, Iowa 52406-0351 (319) 786-4742

Robyn Woeste Manager, Regulatory Affairs Interstate Power and Light Company 200 First Street S.E. PO Box 351 Cedar Rapids, Iowa 52406-0351 (319) 786-4384

II. GAS AFFORDABILITY SERVICE PROGRAM ANNUAL REPORT

Background Information

On January 28, 2008, in Docket No. G001/M-07-1295, the Minnesota Public Utilities Commission (Commission) issued its Order Approving Petition with Modifications, approving IPL's GAP tariffs as modified. The Commission specifically ordered IPL to alter its GAP tariffs to require an annual report.

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Per IPL's GAP tariffs, as required by the Commission, IPL respectfully submits this annual report. The annual report is outlined as follows:

- A. Program Description;
- B. Program Credits, Funding, and Administration Costs;

- C. Program Participation;
- D. Retention, Satisfaction, and Disconnections;
- E. Arrears, Customer Payment Frequency, and Collection Activity;
- F. Additional Reporting Requirements; and
- G. Summary Schedule

The GAP Tracker is provided as Attachment A to this report.

A. Program Description

As noted above, IPL implemented the Program on March 1, 2008, as ordered by the Commission, and in compliance with Minn. Stat. § 216B.16, subd. 15. The Program is intended to lower the percentage of income that low-income households devote to energy bills, to increase customer payments, and to reduce a utility's cost associated with unpaid bills. The Program is also a mechanism to assist customers in paying off arrearage balances. In order to qualify for Program participation, customers must agree to be placed on a level payment plan and must also agree to a payment schedule. In addition, effective with Program year 2012, IPL has taken on the administration of its GAP in-house.

1. Eligibility

The Program is available to any qualified IPL residential natural gas customer receiving assistance from the Low-Income Home Energy Assistance Program (LIHEAP).

A qualified customer must maintain an active account in his or her name only at his or her permanent primary residence. Qualified customers agree to notify the Company of any changes in address, income level, or household size, and are informed that such changes may result in removal from the Program.

If a qualified customer fails to pay, in full, two consecutive monthly payments under the Program, that customer will be terminated from the Program and will be subject to the Company's regular collection practices, including the possibility of disconnection.

2. Discount

The Program has two components. The first is an affordability component, which is a bill credit determined at one-twelfth of the difference between IPL's estimate of the qualified customer's annual gas bill and four percent of the qualified customer's household income, as provided to IPL by the qualified customer. This bill credit is considered a Program cost. Any energy assistance sums not applied to arrears will be applied to a qualified customer's current bill.

The second component of the Program is an arrearage forgiveness element, which is a matching credit that is applied to the customer's account each month after receiving the customer's payment. The application of this monthly credit retires pre-program arrears over a period of up to 24 months. This bill credit is considered a Program cost.

3. Payment

To determine the qualified customer's payment schedule amount, the Company reviews current bills and consumption information as well as the household income information submitted by the customer to the Company. A

qualified customer's payment schedule includes both payment of the customer's current month's bill (which reflects one-twelfth of the level payment plan), after inclusion of the affordability bill credit, as well as payment of a portion of the qualified customer's pre-Program arrears.

Customers on the Program paid a total of \$109,728 towards their energy costs in 2014. The average payment amount per GAP customer in 2014 was \$107.58 per month.

B. Program Credits, Funding, and Administration Costs

Table 1 below contains a summary of the GAP Tracker. For additional detail, please see Attachment A to this Annual Report.

Table 1: GAP Tracker Summary

ITEM	AMOUNT				
Balance as of 12/31/2013 Over/(under) Collected	\$(19,529.90)				
2014 Affordability & Arrearage Forgiveness Credits	\$(45,658.82)				
2014 Administrative Program Costs	\$(1,947.60) ⁽¹⁾				
2014 Collections through Rates	\$47,795.15				
Balance as of 12/31/2014 Over/(under) Collected	\$(19,341.17)				

⁽¹⁾ Pursuant to IPL's Gas Affordability Service Program tariff, IPL's total Program costs are limited to \$50,000 per year, and its administrative costs to 5 % of total Program costs, or \$2,500. Total program costs were \$45,658.82. Accordingly, 5% or \$335.34 of the Administrative Program Costs shall remain uncollected.

1. Program Credits

The total of the affordability and arrearage forgiveness credits applied to GAP customer's accounts during the 2014 Program year was \$45,658.82. The

average monthly credit per customer (86 participants as of December 31, 2014) was \$44.24.

2. Program Funding

The Program is funded by a per therm charge of \$0.0023, which is collected from all customers. The average residential customer cost is approximately \$2.04 per year, or \$0.17 per month.

From January 2014 through December 2014, IPL collected \$47,795.15 from natural gas customers for Program costs.

3. Program Administration Costs

As shown in Table 1 above, IPL's total Program costs for 2014 were \$47,606.42, which is the sum of the affordability & arrearage forgiveness credits (\$45,658.82) and the allow administrative Program costs (\$1,947.60) or 5% of the total Program costs.¹

C. Program Participation

1. Current Enrollment

As of December 31, 2014, there were 86 participants enrolled in the Program. An additional 21 customers had participated at some point in the year, but were removed due to:

- failing to pay pursuant to the non-payment provision of the Program;
- moving; or

⁽¹⁾ Pursuant to IPL's Gas Affordability Service Program tariff, IPL's total Program costs are limited to \$50,000 per year, and its administrative costs to 5 % of total Program costs, or \$2,500. Total program costs were \$45,658.82. Accordingly, 5% or \$335.34 of the Administrative Program Costs shall remain uncollected.

not signing up for energy assistance.

IPL used 95% of the annual program budget of \$50,000 (\$47,606), up from 94% (\$46,887.16) in 2013.

2. Future Enrollment

With the pending sale of IPL's Minnesota natural gas distribution assets to Minnesota Energy Resources (MERC), MERC will be absorbing all current GAP customers into its program. IPL will provide to MERC at conversion, account name, account number, mailing address and phone number, past 12 months gas usage and account balance. The conversion is scheduled for April 30, 2015.

IPL's GAP Program states enrollment participation is granted on a first-come, first-serve basis until the estimated Program dollar cap is reached. Semcac Community Action Agency (Semcac), the organization that formerly administered the Program for IPL, forwarded a waiting list of GAP-eligible customers to IPL. This waiting list was compiled by Semcac by mailing inquiry letters regarding GAP to customers who had otherwise applied for Energy Assistance with Semcac. Semcac dated the resulting returned applications based upon their receipt dates. This created a waiting list of eligible customers ordered on a first-come, first-serve basis. As part of administering the Program, IPL uses this waiting list to find replacement customers for its GAP as appropriate. Customers currently on GAP will remain on GAP as long as they remain eligible, and as long as they do not miss two payments in a row. These customers will have priority over customers on the waiting list. IPL has yet to exhaust the waiting list.

In addition, IPL supplements the waiting list with those customers who express interest in the GAP, whether referred from Semcac or other sources, via inbound phone calls. The IPL Credit and Collections department, which handles day-time inbound Minnesota phone calls, also explain and promote the GAP to eligible customers.

Once the waiting list has been exhausted, IPL plans to use the Minnesota eHeat (Electronic Household Energy Automated Technology) system to filter IPL low-income gas customers for outreach. IPL will send out a mailing asking these customers if they are interested in GAP participation. Semcac has indicated it will continue to assist IPL in verifying the customers' household incomes, even though it no longer administers the Program on behalf of IPL. With the information provided by Semcac, IPL will be able to calculate monthly benefits.

Semcac stated there is a possibility that it can send out letters to GAP-eligible households on IPL's behalf if the waiting list becomes exhausted. When a signed letter is returned to its office, Semcac can confirm the household income and forward the completed form to IPL's office. IPL will investigate this possibility in the future.

D. Retention, Satisfaction, and Disconnections

1. Retention

The maximum number of participants enrolled in the GAP during 2014 was 107, with 86 participants remaining at the end of the year; in other words, 21 participants were removed from the Program during the year. This results in a retention rate of 80 percent during this sixth year of the Program.

2. Customer Satisfaction

IPL did not conduct any customer satisfaction surveys that specifically singled out this Program for evaluation. IPL is not aware of any customer complaints made to the Company, the Commission or other agencies.

3. Disconnections

Of the maximum 2014 GAP participation of 107, none were disconnected for non-payment in 2014.

E. Arrears, Customer Payment Frequency, and Collection Activity

1. Arrears

Of the 86 GAP participants that were on the program at the end of the 2014 Program year, 41 were in arrears for a total of \$10,257.43, with the average amount per participant being approximately \$250.18.

2. Effect of GAP on Customer Payment Frequency

In 2014, IPL received 1,032 payments totaling \$161,568 from the GAP participants, which averages to 86 payments per month.

3. Collection Activity

IPL does not have specific data on the Program's impact on collection activity. However, none of the 525 residential customers disconnected for nonpayment in 2014 were GAP customers.

F. Additional Reporting Requirements

1. Customer payment Frequency

IPL randomly sampled 12 consecutive months' data for 11 GAP customers. These customers paid on time 97% of the time. When compared to

an equal sample for LIHEAP customers, the payment frequency shows customers pay on time only 26% of the time in 2014.

2. Disconnection

Of 2014's maximum of 107 GAP participants, no GAP customers were disconnected in 2014. Customers are removed from GAP prior to disconnection of service.

3. Payment amount

Based on 86 participants as of December 31, 2014, the average <u>annual</u> bill credit amount under GAP was \$530.92, meaning the average <u>monthly</u> bill credit was \$44.24. The GAP participants' average annual bills were \$1,122. The average monthly bills were \$93.50.

4. Customer payment history

A random sampling of 11 GAP participants was reviewed to determine if there was any Program effect on payments in full. All eleven customers paid on time in 2014. Of the 21 customers removed from the program, 7 customers were removed due to two missed payments, 10 customers failed to sign up for Energy Assistance and four customers moved or passed away.

5. Arrearage level

The change in the average arrearage (December 2013 to December 2014) level for GAP customers decreased from \$58.63 average arrears to \$42.17 average arrears. The change in the arrearage level for the sample LIHEAP customers was increased from an average monthly balance of \$46.28 in 2013 to an average arrears balance of \$56.71 in 2014. The change in the arrearage level

for all IPL's residential utility customers decreased from 2013 average balance of \$200.55 to 2014 average balance of \$166.98.

6. Coordination with other available low-income bill payment assistance and conservation resources information relating to how each utility has coordinated its GAP with other available low income and conservation resources, naming the agencies the utility has coordinate with, how often the utility has communicated with those agencies during the year, the content of those communications, and what was accomplished in terms of coordination.

IPL funds Semcac for energy efficiency upgrades to low income homes through its Conservation Improvement Program.

G. Summary Schedule

Please see Attachment B for a Summary Schedule required by the Commission's September 25, 2013, *Order Accepting Gas Affordability Program Reports*.

III. CONCLUSION

WHEREFORE, IPL requests the Commission accept IPL's Annual Report as compliance with IPL's GAP tariffs.

DATED this 31st day of March, 2015.

Respectfully submitted,

INTERSTATE POWER AND LIGHT COMPANY

By /s/ Samantha C. Norris

Senior Attorney
Alliant Energy Corporate Services, Inc.
200 First Street S.E.

P.O. Box 351

Cedar Rapids, IA 52406-0351

(319) 786-4236

samanthanorris@alliantenergy.com

MN GAP Program Admin Expense Calculation

						Therms Sold	Revenues	
	Bill Credit	Forgiveness	Total Customer	Admin Amount	Total Customer &	to	Collected	Over/(Under)
Month	Expenses	Expenses	Expenses	for Month	Admin Expenses	Customers	Through Tariff	Collection
Balance at								
1/1/2014								(19,529.90)
Jan-14	3,596.20	99.14	3,695.34	514.07	4,209.41	3,692,082	8,491.79	4,282.38
Feb-14	3,539.80	129.65	3,669.45	71.54	3,740.99	3,285,355	7,556.32	3,815.33
Mar-14	3,983.01	229.90	4,212.91	(30.45)	4,182.46	2,847,319	6,548.83	2,366.37
Apr-14	3,813.63	183.09	3,996.72	255.49	4,252.21	1,773,571	4,079.21	(173.00)
May-14	3,818.74	222.09	4,040.83	(72.16)	3,968.67	1,296,709	2,982.43	(986.24)
Jun-14	3,483.76	147.36	3,631.12	273.69	3,904.81	698,120	1,605.68	(2,299.13)
Jul-14	3,854.57	113.63	3,968.20	(97.12)	3,871.08	545,418	1,254.46	(2,616.62)
Aug-14	3,692.71	102.70	3,795.41	214.43	4,009.84	495,470	1,139.58	(2,870.26)
Sep-14	3,576.85	77.77	3,654.62	133.88	3,788.50	621,113	1,428.56	(2,359.94)
Oct-14	3,307.46	60.45	3,367.91	(42.79)	3,325.12	831,659	1,912.82	(1,412.30)
Nov-14	3,537.40	24.68	3,562.08	516.22	4,078.30	1,905,272	4,382.13	303.83
Dec-14_	4,050.25	13.98	4,064.23	210.80	4,275.03	2,788,409	6,413.34	2,138.31
Total	44,254.38	1,404.44	45,658.82	1,947.60	47,606.42	20,780,497	47,795.15	(19,341.17)

IPL 2014 GAP Summary Schedule

- 1. Average annual affordability benefit received per customer \$514.58
- 2. Average annual arrearage forgiveness benefit receive per customer \$16.33
- 3. Percentage of Low Income Home Energy Assistance (LIHEAP) program customers that participated in GAP **4%**
- Disconnect rates for (a) GAP customers, (b) LIHEAP Non GAP customers, and (c) non-LIHEAP customers (all firm customers including C & I (a) 0%, (b) 0.009%, (c) 0.0116%
- 5. Number of GAP participants enrolled as of year-end 86
- 6. Number of GAP participants enrolled and receiving benefits at some time during the year **107**
- 7. Annual program budget \$50,000
- 8. Actual program revenue **\$47,795.15**
- 9. Actual program cost \$1,947.60
- 10. GAP tracker balance as of year-end \$19,341.17
- 11. GAP rate-affordability surcharge (\$/therm) \$0.0023