

Alliant Energy Corporate Services Legal Department 319.786.4807 Telephone 319.786.4533 – Fax

Kent M. Ragsdale Managing Attorney - Regulatory

January 27, 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 Reply Comments

Dear Dr. Haar:

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

On December 19, 2013, the Minnesota Department of Commerce, Division of Energy Resources (Department), filed its Comments recommending that the Commission accept IPL's 2012 Annual Service Quality Report, pending the submittal of additional information regarding involuntary service disconnections. The Department notes that IPL's involuntary disconnection information did not reconcile with the involuntary disconnection information contained in IPL's companion report filed in Docket No. E001/M-13-249 related to its Minnesota electric operations.

IPL reviewed its information and discovered that there was a data entry and calculation error contained in the monthly Cold Weather Rule Summary Report as filed on May 1, 2013, in Appendix A, page 4, included within its initial May 1, 2013, filing in this docket. A corrected version of the Cold Weather Rule Summary Report, pages 4 through 6, is attached. IPL is concurrently making a companion filing in Docket No. E001/M-13-249.

IPL apologizes for any confusion or additional work this may have caused the Department.

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 January 27, 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,

<u>/s/ Kent M. Ragsdale</u> Kent M. Ragsdale Managing Attorney - Regulatory

KMR/tao Enclosures

cc: Service List

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 27th day of January, 2014, 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, messenger, electronic mail, facsimile and/or first-class mail, proper postage prepaid from Cedar Rapids, Iowa.

<u>/s/ Tonya A. O'Rourke_</u>

Tonya A. O'Rourke

Subscribed and Sworn to Before Me this 27th day of January, 2014.

/s/ Kathleen J. Faine

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

| First 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_13-324_M-13-324 |
| Christopher | Anderson | canderson@allete.com | Minnesota Power | 30 W Superior St Duluth, MN 558022191 | Electronic Service | No | OFF_SL_13-324_M-13-324 |
| 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 | Yes | OFF_SL_13-324_M-13-324 |
| William A. | Blazar | bblazar@mnchamber.com | Minnesota Chamber Of Commerce | Suite 1500 400 Robert Street Nor St. Paul, MN 55101 | Electronic Service th | No | OFF_SL_13-324_M-13-324 |
| Michael | Bradley | mike.bradley@lawmoss.co m | Moss & Barnett | Suite 4800 90 S 7th St Minneapolis, MN 55402-4129 | Electronic Service | No | OFF_SL_13-324_M-13-324 |
| City | Clerk | sschulte@city.albertlea.org | City of Albert Lea | 221 E Clark St Albert Lea, MN 56007 | Electronic Service | No | OFF_SL_13-324_M-13-324 |
| 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 | OFF_SL_13-324_M-13-324 |
| 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_13-324_M-13-324 |
| David | Grover | dgrover@itctransco.com | ITC Midwest | 444 Cedar St Ste 1020 Saint Paul, MN 55101-2129 | Electronic Service | No | OFF_SL_13-324_M-13-324 |
| Burl W. | Haar | burl.haar@state.mn.us | Public Utilities Commission | Suite 350 121 7th Place East St. Paul, MN 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@mnutilityinvestors.org Minnesota Utility Investor | | 413 Wacouta Street #230 St.Paul, MN 55101 | Electronic Service | No | OFF_SL_13-324_M-13-324 | |
| 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 | OFF_SL_13-324_M-13-324 | |
| Jim | Krueger | jkrueger@fmcs.coop | Freeborn-Mower Cooperative Services | Box 611 Albert Lea, MN 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 445 Minnesota St St. Paul, MN 551012130 | Electronic Service | Yes | OFF_SL_13-324_M-13-324 | |
| Kavita | Maini | kmaini@wi.rr.com | KM Energy Consulting LLC | 961 N Lost Woods Rd Oconomowoc, WI 53066 | Electronic Service | No | OFF_SL_13-324_M-13-324 | |
| Pam | Marshall | pam@energycents.org | Energy CENTS Coalition | 823 7th St E St. Paul, MN 55106 | Electronic Service | No | OFF_SL_13-324_M-13-324 | |
| David | Moeller | dmoeller@allete.com | Minnesota Power | 30 W Superior St Duluth, MN 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 Minneapolis, MN 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 Saint Paul, MN 55103 | Electronic Service | No | OFF_SL_13-324_M-13-324 | |
| Kent | Ragsdale | Ragsdale kentragsdale@alliantenerg Alliant Energy-Interstat y.com Power and Light Comp | | P.O. Box 351 200 First Street, SE Cedar Rapids, IA 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 | Il rsavelkoul@martinsquires.c Martin & Squires, P.A. om | | 332 Minnesota Street Ste W2750 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 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 St. Paul, MN 55116 | Electronic Service | No | OFF_SL_13-324_M-13-324 |
| 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_13-324_M-13-324 |
| Robyn | Woeste | robynwoeste@alliantenerg y.com | Interstate Power and Light Company | 200 First St SE Cedar Rapids, IA 52401 | Electronic Service | No | OFF_SL_13-324_M-13-324 |

Interstate Power & Light Company Gas Service Quality Report

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 2 3 | Number of Residential Customer Accounts: Number of Past Due Residential Customer Accounts: Number of Cold Weather Protection Requests: | 44,001 7,987 557 | 43,970 7,181 319 | 43,934 7,450 484 | 43,919 7,332 255 | 44,032 6,381 | 43,845 6,964 | 43,855 6,946 | 43,834 8,092 | 43,821 8,077 | 43,856 8,222 159 | 43,887 7,740 2,017 | 43,917 7,924 1,537 |
| RECO 4 | NNECTION AT BEGINNING OF COLD WEATHER MO Number of "Right to Appeal" notices mailed to customers: | ONTHS 0 | 0 | 0 | 0 | | | | | | 0 | 0 | 0 |
| 5 6 | Intentionally Blank Number of customer accounts granted reconnection request: | 2 | 40 | 11 | 12 | | | | | | 34 | 11 | 8 |

INABILITY TO PAY (ITP)

10% PLAN (TPP)

Interstate Power & Light Company Gas Service Quality Report

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 |
|--|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|-----------|--------|
| PAYMENT SCHEDULE (PS) | | | | | | | | | | | | |
| 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 Intentionally Blank | | | | | | | | | | | | |
| 18 Number of PS negotiations mutually agreed upon: | 104 | 74 | 324 | 122 | | | | | | 125 | 951 | 40 |
| 19 Intentionally Blank | | | | | | | | | | | | |
| DISCONNECTIONS | | | | | | | | | | | | |
| Number of disconnection notices mailed to | | | | | | | | | | | | |
| 20 customers: | 3,417 | 2,222 | 2,387 | 3,017 | 2,540 | 2,334 | 2,728 | 3,819 | 3,697 | 4,038 | 2,844 | 3,202 |
| Number of customer accounts disconnected who di | | _/ | | -, | | | | -, | -, | ., | _/_ · · · | -/ |
| 21 not seek protection: | | | | | | | | | | | | |
| Duplicate columns for use in Apr and Oct | | | | | | | | | | | | |
| April 1-15 and October 1-15 in 1st column | | | | | | | | | | | | |
| All other months, use 1st column only | | | | | | | | | | | | |
| a) # Electric - heat affected | 9 | 39 | 24 | 15 | 104 | 60 | 58 | 49 | 48 | 31 | 9 | 12 |
| b) # Electric - heat not affected | | | 24 | 15 | 104 | 00 | 50 | 45 | 40 | 51 | | 12 |
| c) # Gas - heat affected | 1 | 1 | | | 2 | 1 | 1 | | 1 | | | |
| d) # Gas - heat not affected | | | | | | | | | | | | |
| e) Total # disconnected | 10 | 40 | 24 | 15 | 106 | 61 | 59 | 49 | 49 | 31 | 9 | 12 |
| April 16-30 and October 16-31 in 2nd column | | | | | | | | | | | | |
| All other months, use 1st column only | _ | | | | | | | | | | | |
| a) # Electric - heat affected | | | | 27 | | | | | | 11 | | |
| b) # Electric - heat not affected | | | | | | | | | | | | |
| c) # Gas - heat affected | | | | | | | | | | | | |
| d) # Gas - heat not affected | | | | | | | | | | | | |
| e) Total # disconnected | 0 | 0 | 0 | 27 | 0 | 0 | 0 | 0 | 0 | 11 | 0 | 0 |
| Number of customer accounts disconnected seeking | | | | | | | | | | | | |
| 22 protection: | • | | | | | | | | | | | |
| a) # Electric - heat affected | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| b) # Electric - heat not affected | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| c) # Gas - heat affected | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| d) # Gas - heat not affected | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| e) Total # disconnected (See Note) | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | | | | | | | | | | | | |
| NOTE: Please report immediately the names and | 1 | | | | | | | | | | | |
| addresses of customers whose service has been | 1 | | | | | | | | | | | |
| disconnected more than 24 hours. | | | | | | | | | | | | |
| Number of customer accounts disconnected for | | | | | | | | | | | | |
| nonpayment (auto-calculation of #21e+ #22e): | 10 | 40 | 24 | 42 | 106 | 61 | 59 | 49 | 49 | 42 | 9 | 12 |
| | 10 | 40 | 24 | 42 | 100 | 01 | 59 | 49 | 49 | 42 | 9 | 12 |

Interstate Power & Light Company Gas Service Quality Report

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 |
|------|---|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| DOLL | AR VALUE | | | | | | | | | | | | |
| 24 | Total 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 | Average 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 | Total 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 | Total dollars received from other sources (private organizations): | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 |
| 28 | Total 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 | Average monthly residential bill: (auto-calculation of #28 ÷ #1) | \$100 | \$90 | \$75 | \$58 | \$58 | \$67 | \$103 | \$103 | \$84 | \$64 | \$66 | \$84 |
| 30 | Intentionally Blank | ŞIUU | ÇJU | ر بې | υC | ÇJU | γUγ | 9103 | 9103 | ΨŪΨ | τος | ŞÜÜ | τυς |
| 30 | Average annual residential bill: I otal residential account write-offs due to | | | | | | | | | | | | |
| 31 | 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 |
| DIGO | DNNECTION DURATION | | | | | | | | | | | | |
| 32 | Number of customer accounts disconnected 24 | | | | | | | | | | | | |
| | hours or more:) # Electric - heat affected | 0 | 17 | 12 | 9 | | _ | _ | _ | | 13 | 2 | 6 |
| |) # Electric - heat not affected | | 17 | 14 | | | | | | | 10 | - | |
| | ;) # Gas - heat affected | | | | | | | | | | | | |
| | i) # Gas - heat not affected j) Total # disconnected | 0 | 17 | 12 | 9 | 0 | 0 | 0 | 0 | 0 | 13 | 2 | 6 |
| 33 | Intentionally Blank | 0 | 1/ | 12 | 5 | 0 | 0 | 0 | U | 0 | 15 | Z | 0 |
| | Number occupied heat-affected accounts | | | | | | | | | | | | |
| 34 | disconnected 24 hours or more (to include customers who did and did not seek protection). | | | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | | | | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 35 | Intentionally Blank | | | | | | | | | | | | |
| 36 | Intentionally Blank | | | | | | | | | | | | |
| RECO | RECONNECTION DATA | | | | | | | | | | | | |
| 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 |
| |) 1-30 days) 31-60 days | 4 | 13 2 | 16 10 | 28 11 | 34 10 | 11 19 | 31 10 | 14 23 | 18 10 | 2 | 4 | 0 |
| | ;) 61+ days | 51 | 49 | 47 | 52 | 56 | 68 | 76 | 74 | 91 | 88 | 80 | 76 |
| | | | | | | | | | | | | | |