

STATE OF IOWA
BEFORE THE IOWA UTILITIES BOARD

IN RE:)	
)	DOCKET NO. RMU-2016-0018
REVIEW OF ENERGY EFFICIENCY)	
PLANNING AND COST REVIEW)	
RULES [199 IAC CHAPTER 35])	INITIAL POST-WORKSHOP
)	COMMENTS
)	
)	

The Environmental Law & Policy Center (ELPC) and Iowa Environmental Council (IEC) file these Initial Post-Workshop Comments pursuant to the Iowa Utilities Board's Order Requesting Additional Comments issued on May 8, 2019. ELPC and IEC structure these comments based on the Board's seven listed items in its May 8 Order.

1. Budget category definitions.

Budget category definitions should be included in the rules at this time, not delayed to a future proceeding. Delay in adopting definitions will create an additional, unnecessary proceeding and risk the absence of specific guidance on this set of definitions as the next 5-year plans are being developed. If the proceeding to develop definitions is not begun until year 3 of the plans, it will likely not be concluded until year 4 when plan development will be well underway. For the definitions to be useful for the next plan, they should be adopted now.

Our primary concern with the definitions is ensuring that all costs not subject to the cost-effectiveness tests, including educational programs, are excluded. The budget category definitions should serve to clarify which costs belong in that category. In addition, it is important

to have accountability for the level of administrative program costs and budget categories should reflect that. Finally, the budget definitions should line up with definitions for the various cost-effectiveness tests as closely as possible to allow more straightforward Board and stakeholder review of cost effectiveness results.

2. Non-energy benefits.

ELPC and IEC reiterate our support for full inclusion of non-energy benefits in cost-effectiveness tests, which we included in past comments in this docket filed on December 8, 2017.

3. Demand response definition.

ELPC and IEC reiterate our support for modifying the Board's proposed demand response definition to clarify that DR is intended to reduce utility-provided power and does not necessarily require a facility to reduce its overall energy use if it has backup generation or storage on site which we included in comments filed in this Docket on March 1, 2019.

4. Separate lines for EECR and DRCR factors.

IPL has proposed to represent energy efficiency and demand response costs as a single item with a single line on customers' bills, unless customer exemptions are allowed under Iowa Code § 476.6(16)(a)(1)(b). If exemptions are allowed, IPL would separate these costs into two lines.

ELPC and IEC are concerned that IPL's approach, as proposed, would result in both demand response and energy efficiency costs listed only as energy efficiency costs. This would cause customers to misinterpret energy efficiency budgets and costs to be higher than they actually are and would ignore demand response costs and budgets. IPL also has not explained what connection the separation of these costs has to the question of customer exemption. ELPC

and IEC do not support this approach. To the extent demand response and energy efficiency costs are represented on customer bills, customers should be able to see each cost separately.

5. Mid-year modifications for EECR/DRCR.

ELPC and IEC reserve the right to address this issue in reply comments.

6. Retaining 35.9 and 35.11 requirements for electric utilities.

ELPC and IEC reiterate our support for retention of the rules and filings requirements in 35.9 and 35.11, which we included in comments filed in this docket on March 23, 2017, December 8, 2017, and March 1, 2019. This includes, but is not limited to, the resource planning, load forecast, class load data requirements, including annual filing requirements, and the avoided cost calculations in these rule sections.

7. Retaining 35.10 and 35.11 requirements for gas utilities.

ELPC and IEC reiterate our support for retention of the rules and filings requirements in 35.10 and 35.11, which we included in comments filed in this docket on March 23, 2017, December 8, 2017, and March 1, 2019. This includes, but is not limited to, the resource planning, load forecast, class load data requirements, including annual filing requirements, and the avoided cost calculations in these rule sections.

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Respectfully submitted,

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