

STATE OF IOWA
DEPARTMENT OF COMMERCE
UTILITIES BOARD

IN RE: INTERSTATE POWER AND LIGHT COMPANY	DOCKET NO. WRU-07-3-150
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ORDER GRANTING WAIVER

(Issued July 3, 2007)

On February 13, 2007, Interstate Power and Light Company (IPL) filed with the Utilities Board (Board) a request for waiver regarding some of the information required to be included in the annual electric reliability report filed pursuant to 199 IAC 20.18. In particular, IPL asked for a waiver of 199 IAC 20.18(7)"b"(3), which requires the momentary average interruption frequency index (MAIFI) reliability indices for the previous five years be filed for the utility's Iowa service territory and for each defined Iowa operating area for which momentary interruptions are tracked. The subrule requires that the first annual report specify which portions of the system are monitored for momentary interruptions and identify and describe the quality of the data used. The subrule also requires that updates be provided as needed in subsequent reports. IPL filed a clarification to its waiver request on May 1, 2007. No objections to the waiver request were filed.

In support of its waiver request, IPL said the information that is the subject of the waiver request is collected by manually reading recloser and breaker counter readings. IPL argued that this reporting requirement posed an undue hardship

because the information (recloser and breaker counter readings) has been collected manually by field personnel. IPL estimated that these readings consumed 120-150 man-hours per reading cycle. In the past, IPL said these readings were used to detect a pattern of momentary interruptions. However, because of the sensitivity of consumer electronic devices on the market today, IPL stated that it is notified by its customers of repeated momentary interruptions far earlier than the manual reading program detects such interruptions. Also, IPL noted that the counters can stick or may record maintenance interruptions, which can result in over- or under-reporting. IPL maintained that the cost of these manual reads outweighs any benefit of the program.

The Board will grant the waiver. Continued manual readings by IPL appear to have limited value. IPL no longer uses the information internally because it is notified by customers of repeated momentary interruptions in real time, before any manual readings would be conducted. Also, there can be problems with the counters (dirt, insect nests) that distort the readings without any negative impacts to the actual operation of the recloser or breaker. The cost of obtaining the information appears to outweigh any benefits in tracking or correcting repeated momentary interruptions.

IPL has established that application of the rule poses an undue hardship. Waiving the requirement will eliminate the need for costly and time-consuming manual readings. Granting the waiver will not prejudice the substantial legal rights of any person because the remainder of the information required in the annual reliability reports will be provided. There is no requirement in Iowa Code chapter 476 (or any

other chapter) that mandates this reporting requirement and the public health, safety, and welfare will not be negatively impacted by the waiver because similar information is obtained by other methods. The standards for a waiver contained in 199 IAC 1.3 have been satisfied.

The Board notes that the initial waiver request generated a concern that IPL had already discontinued the manual readings, without the benefit of a waiver. The May 1, 2007, clarification filed by IPL indicated that this was not the case, and the information was in fact contained in IPL's recent reliability report filed on or about May 1, 2007. The Board reminds all utilities that it expects full compliance with its rules and that appropriate waivers must be obtained prior to any deviations from the standards, practices, or other requirements contained in the rules.

IT IS THEREFORE ORDERED:

The request for waiver filed by Interstate Power and Light Company on February 13, 2007, as clarified on May 1, 2007, is granted.

UTILITIES BOARD

/s/ John R. Norris

/s/ Curtis W. Stamp

ATTEST:

/s/ Margaret Munson
Executive Secretary, Deputy

/s/ Krista K. Tanner

Dated at Des Moines, Iowa, this 3rd day of July, 2007.