

STATE OF IOWA
BEFORE THE IOWA UTILITIES BOARD

IN RE: INTERSTATE POWER AND LIGHT COMPANY	DOCKET NO. M-0150
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**INTERSTATE POWER AND LIGHT COMPANY'S
CUSTOMER SUPPORT PLAN**

Interstate Power and Light Company (IPL) has taken significant steps during the last two months to assist customers and safeguard utility staff during the unprecedented and rapidly changing COVID-19 pandemic and will continue to take significant actions in the coming months. These ongoing measures have included temporarily suspending disconnections for all Iowa customers, proactively reconnected those who were previously disconnected, waiving late fees and reconnection fees, and implementing policies and procedures to enhance the safety of our customers and employees. Providing this support to customers is consistent with IPL's prioritization of the safety and welfare of our customers and employees and has allowed them to focus on the health of their families and businesses during this situation. IPL's efforts also align with our customer-focused strategy and core values to Do the Right Thing and Make Things Better.

IPL recognizes that a coordinated approach has been required to successfully address customer and utility needs during this time. On March 9, 2020, Iowa Governor Kim Reynolds issued a statewide disaster proclamation of public health emergency. In response to the proclamation, the Iowa Utilities Board (Board) issued an order on March

13, 2020, extending the winter moratorium for eligible electric and natural gas customers. IPL filed its policies adopted to respond to the pandemic on March 20, 2020, and has continued to provide information to customers. In that filing, IPL noted that it would remain in communication with the Board regarding the term and conclusion of these temporary measures. On March 27, 2020, the Board issued an emergency order restricting disconnection of service. By proclamation dated April 27, 2020, Governor Kim Reynolds extended the Disaster Emergency to May 27, 2020, thereby extending the disconnection moratorium through that date.

On May 1, 2020, the Board issued an Order Authorizing Regulatory Accounts and Establishing Additional Reporting Instructions recognizing the unique and unanticipated financial impacts of this pandemic. In the Order, the Board noted that as “restrictions on disconnection come to an end, coordination is needed among the Board, utilities, and partner agencies to minimize ramifications while assuring both safe, reliable service to customers and just and reasonable compensation to the utilities.” Order at pp. 2-3. IPL agrees with the Board that impact of the COVID-19 pandemic on our customers and Company, and all Iowans, are expected to continue beyond the anticipated May 27, 2020 expiration of the state public health emergency and continued coordination is needed. Therefore, IPL has been diligently working in coordination with the Board and other electric, gas and water utilities to ensure safe and reliable service is provided to customers impacted by COVID-19.

IPL is filing this Customer Support Plan to provide the Board with additional information on IPL’s efforts in recent weeks to support our customers and steps IPL will

be taking over the coming weeks to allow further coordination as business and the state begin to reopen when the state public health emergency is lifted.

CUSTOMER SUPPORT PLAN

IPL's Customer Support Plan focuses first and foremost on our customers. This plan details the efforts IPL is undertaking to assist customers during the state public health emergency, the actions IPL will continue undertaking after the state public health emergency is lifted, and the coordination IPL's plan allows for as temporary measures end.

Customer Education Campaign

IPL recognizes that communication is a key element to meeting customer expectations, and we routinely engage and communicate with our customers through our website, email alerts, bill inserts, printed material and social media. To assist customers in identifying resources and establishing payment agreements while the state public health emergency remains in effect, IPL has initiated a customer education campaign to encourage eligible customers to sign up for the Low-Income Heating Assistance Program (LIHEAP) and crisis funds for assistance with utility bill payments. The LIHEAP application period has been extended to May 31, 2020, providing additional opportunities for customers to receive heating assistance. In addition, on April 9, 2020, Alliant Energy made a \$1 million contribution to the Hometown Care Energy Fund that assists Iowa customers that need financial help to pay their bill.

IPL's customer education campaign undertaken in recent weeks to reach customers impacted by the COVID-19 pandemic has included use of various means to reach customers, including calls and emails encouraging those eligible for LIHEAP and

other assistance to sign-up, emails to large employers encouraging them to share information with their employees who are our customers, and calls and flyers to local nonprofits. As of May 12, 2020, IPL has sent approximately 243,000 emails to Iowa residential customers advising them of LIHEAP assistance, reached approximately 25,500 people on social media, and has contacted thousands of customers via outbound calls focusing on customers that received LIHEAP assistance in previous years but have not yet received assistance this year. IPL is also actively coordinating with Community Action Agencies and other community-based organizations to safely distribute informational flyers to high need centers such as food banks, school lunch distributions and other non-profit help centers. As of May 12, 2020, IPL has provided 5,500 flyers to the Hawkeye Area Community Action Program (HACAP) and 500 flyers to the IMPACT Community Action Partnership.

In addition to disseminating information regarding LIHEAP to residential customers, IPL is also initiating calls and sending reminder letters in advance of resumption of collections activities, to residential and non-residential customers with past due balances. This outreach encourages customers to contact IPL to make arrangements to address their balance prior to potential disconnection.

Coordinated Resumption of Collection Activities

This emergency has broad-reaching impacts, and IPL recognizes the need for coordination by the Board to minimize ramifications. To this end, IPL has remained in communication with Black Hills Energy, MidAmerican Energy Company, the Iowa Utility Association, and other utilities to coordinate and enable a staggered approach to

resuming collection activities. IPL does not intend to issue any 12-day disconnection notices for non-payment prior to July 1, 2020.¹

IPL utilizes reminder letters and personal contact attempts to enable customers with a past due balances to enter into payment agreements; disconnection of service is always a last resort. IPL anticipates that this delay in starting the collection process and the other measures outlined in this Customer Support Plan will have financial consequences for IPL. However, IPL believes that these are the right decisions for its customers as IPL continues to provide exceptional customer service during and after this period.

In normal circumstances, IPL manages the number and pace of collections activities and disconnection notices following the end of winter moratorium to promote timely support and assistance to customers. IPL will undertake a comparable process when disconnection notices are issued in July. At the end of the normal winter moratorium IPL establishes a past-due threshold for each customer class that is used to issue disconnection notices. This approach enables IPL to minimize call wait times for customers seeking to establish payment arrangements or contact IPL for other reasons. Beginning in July and continuing through the remainder of the year, IPL will monitor the number of notices sent to customers and will continue to utilize minimum past-due balance thresholds for each customer class to limit the number of notices sent. IPL will adjust these minimum thresholds throughout the remaining months to ensure the number of customers subjected to collection action allows IPL to continue providing support and

¹ In the event Governor Reynolds extends the Disaster Emergency past May 27, 2020 or other action is taken, IPL will evaluate whether any adjustments to the resumption of collection activities or other Customer Support Plan modifications are necessary.

assistance. IPL will provide additional information regarding these activities to the Board through regular monthly meetings with Board staff, as necessary.

To further financially assist customers, IPL is willing to continue its temporary waiver of late fees and reconnection fees if the Board finds such a continuation is reasonable. However, IPL recognizes these charges are important to managing customer arrears and continued waiver may result in larger uncollectible balances in the future. In addition, IPL will be returning more than 80 percent of residential customer deposits, with interest at the rate specified in the Iowa Administrative Code.² IPL's decision to return these deposits is intended to provide these customers with additional resources during this state public health emergency. IPL is also evaluating additional opportunities to further assist low-income, residential, and commercial and industrial customers, through potential Federal and State crisis funds, energy efficiency resources, tax approaches, and/or legislative initiatives. As recognized by the Board, minimizing the ramifications of the pandemic will require continued coordination on these topics.

Review and Expansion of Medical Exemption Policies

IPL is also reviewing its medical exemption policies that may be implicated in supporting customers directly impacted by COVID-19. This effort includes updating existing policies related to health postponements for medical conditions to request, but not require a written statement from a doctor or public health official in order to qualify for a medical postponement in the event of a COVID-19 illness.³

² The deposit plus accumulated interest, less any unpaid utility bill of the customer, will be returned to as a credit on the customer's bill.

³ See 199 IAC 19.4(15)(d)(8) and 199 IAC 20.4(15)(d)(9) (providing that a "utility may require written verification of the especial danger to health by a physician or a public health official).

Additionally, IPL has identified specific types of customers that will not be disconnected to enhance public safety, including nursing homes, assisted living facilities, hospitals, etc. IPL will continue to work closely with these types of customers during and after the public health emergency to ensure continuous service and address any past due balances on a case-by-case basis. IPL will also continue to evaluate whether other types of customers should also not be disconnected at this time to further promote public health.

Payment Agreements

A key component of IPL's existing customer support strategy involves providing customers with additional information and choices. As collection activities begin in July, IPL will leverage many features of our upgraded MyAccount and new automated metering infrastructure (AMI) to enhance customer service. The new MyAccount allows customers to establish payment arrangements directly on our website, pay with credit cards without any transaction fees, and reconnect their electric service through MyAccount within minutes of payment online – without calling the customer support center.

In light of the continued impacts of the COVID-19 pandemic on our customers and communities, IPL is reviewing its existing payment agreement policies to provide additional support for customers through the remainder of this year. This may include additional options for new, renegotiated or extended payment agreement terms for small businesses impacted by the pandemic. In addition, if a customer fails to comply with the terms of a payment agreement, IPL typically provides a new 12-day disconnection notice rather than only a 24-hour notice, along with a phone call one to three days prior to the disconnection date.⁴ IPL intends to continue this policy this year to further support

⁴ Pursuant to 199 IAC 20.4(15)(f) a utility may disconnect electric service after 24-hour notice (and without the written 12-day notice) for failure of the customer to comply with the terms of a payment agreement.

customers and is not opposed to an extension of the 24-hour notice provision. IPL also has and will continue to provide training to its Customer Support Representatives on its policies to support customers.

CONCLUSION

IPL is focused on supporting its customers during and after the state public health emergency is lifted. This Customer Support Plan represents a coordinated approach to providing safe, reliable service to customers and exceptional customer service. IPL supports continued coordination to successfully address customer and utility needs during this time.

Respectfully submitted this 14th day of May, 2020.

INTERSTATE POWER AND LIGHT COMPANY

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