



Alliant has a significant and direct interest in this proceeding. Alliant is the parent company to Interstate Power and Light Company / Wisconsin Power and Light (collectively “IPL”) and a defendant in the Iowa litigation referenced in Mediacom’s Petition for Declaratory Ruling.<sup>4</sup> Alliant’s subsidiary, IPL, is also the signatory to the pole lease agreement with Mediacom’s subsidiary, MCC Iowa, LLC (“MCC”), which contains the indemnification provision quoted in Mediacom’s Petition. In addition, Alliant owns electric distribution infrastructure in Iowa, Minnesota and Wisconsin. Through its various subsidiaries, Alliant has entered into pole leases agreements with numerous third parties, including providers of cable and telecommunications services, all of which contain indemnity provisions.

Alliant agrees with Oncor and other interested parties supporting an extension of the filing deadlines that the Petition has raised complex legal and policy issues and that the scope of the requested relief is significant and far-reaching. An extension of time will allow industry stakeholders to develop their comments more fully, in consultation with each other and their experts, and will result in a more complete record in this proceeding. Moreover, Alliant agrees with Oncor that the requested extension will not prejudice Mediacom or any other interested party. As Oncor notes, Mediacom’s subsidiary entered into the pole lease agreement with IPL in 2002, but did not file its petition until February 2014. In addition, the proposed thirty-day extension will not materially delay the underlying tort action in Iowa, which is not set for trial until July, 2015.

For the foregoing reasons, Alliant respectfully supports Oncor’s Motion to Extend the Comment Deadline from May 8, 2014 to June 9, 2014 and to extend the Reply Comment deadline from May 23, 2014 to June 23, 2014.

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<sup>4</sup> *Maribel Romero v. Interstate Power and Light v. MCC Iowa LLC, Iowa District Court for Johnson County, Case No. LACV 075505.*

Respectfully submitted,

/s/ Danielle D. Smid

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