

conduct parallel settlements responds positively to the many uncertainties about the possible results of ELMP. The OMS urges the Commission to assure that the parallel settlement proposal is retained.

The OMS submits these comments because a majority of the members have agreed to generally support them. Individual OMS members reserve the right to file separate comments regarding the issues discussed in these comments.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.
Dated at Des Moines, Iowa, this 13th day of January, 2012.

William H. Smith, Jr.