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Paula N. Johnson
Regulatory Attorney

July 27, 2009

Ms. Judi Cooper
Executive Secretary
Iowa Utilities Board
350 Maple Street
Des Moines, IA 50319-0069

RE: Interstate Power and Light Company
Docket No. RPU-2009-0002
Application and Affidavit for Confidentiality

Dear Secretary Cooper:

Enclosed please find Interstate Power and Light Company's (IPL) Application for Confidential Treatment and Affidavit in Support of Request for Confidentiality in the above-referenced docket, as filed today on EFS.

IPL submits this filing in order to request the continued confidential treatment of portions of the Office of Consumer Advocate's Direct Testimony and Exhibits filed with the Iowa Utilities Board on July 17, 2009.

Very truly yours,

/s/ Paula N. Johnson
Paula N. Johnson
Regulatory Attorney

PNJ/tao
Enclosures

Interstate Power and Light Co.
An Alliant Energy Company

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**FILED WITH
Executive Secretary
July 27, 2009
IOWA UTILITIES BOARD**

**STATE OF IOWA
BEFORE THE IOWA UTILITIES BOARD**

IN RE:	
INTERSTATE POWER AND LIGHT COMPANY	DOCKET NO. RPU-2009-0002

APPLICATION FOR CONFIDENTIAL TREATMENT

COMES NOW, Interstate Power and Light Company (IPL), and for its request for confidential treatment pursuant Iowa Code § 22.7(3) and (6) 2007, states as follows:

DISCUSSION

1. IPL is submitting this Application for confidential treatment, in response to the direct testimonies and referenced exhibits filed with the Iowa Utilities Board (Board) on July 17, 2008, by the Office of Consumer Advocate (OCA).

2. Specifically, this confidential information includes references to: (i) the attribution of certain cancellation costs for the Sutherland Generating Station Unit 4 (SGS Unit 4) in Marshalltown, Iowa; (ii) the titles and salaries of personnel involved in a workforce reduction; and (iii) Amortization schedule for Notes due February 2030. These references can be found in the following specific locations:

- Information Regarding SGS Unit 4 Cancellation Costs
 - Direct Testimony of Charles E. Fuhman on behalf of OCA, page 51, lines 4 – 15.

- Direct Exhibits of Charles E. Fuhrman on behalf of OCA
 - OCA Exhibit CEF-1, Schedule E, Pages 1 and 2 of 2, Data Request No. 80
- Titles and Salaries of Personnel Involved in Workforce Reduction
 - Direct Exhibit of Fasil Kebede
 - OCA Exhibit FK-1, Schedule E, Pages 2 through 4, Data Request No. 100
- Amortization Schedule for Notes Due February 2030
 - OCA Exhibit SJP-1, Schedule F, Attachment A, Data Request No. 103

SGS Unit 4 Cancellation Costs

3. References are contained in both the OCA's testimony and exhibits that reference the status of the attribution of certain SGS Unit 4 cancellation costs between and among IPL and the other SGS Unit 4 participants. The attribution of these SGS Unit 4 cancellation costs remains unresolved among the SGS Unit 4 participants. The discovery of the information discussed in the OCA's testimony and related exhibit could harm IPL's ability to manage these costs and eventually higher costs to the customer which furthers no public purpose.

Titles and Salaries of Personnel Involved in Workforce Reduction

4. References are made in the exhibits to job titles and salaries which could be reasonably used to identify former employees of Alliant Energy. Pursuant to its internal Policy 100, "Alliant Energy ... protects the Personal Data of its current and former employees...." The same Alliant Energy Policy defines Proprietary and Confidential Information to include trade secrets, and further defines trade secrets to include information relating to the business, financial, legal, and personnel matters of the company. Public disclosure of the personnel information would require public disclosure of a protected trade secret, and would require Alliant Energy to violate its

internal policy requiring the strict protection of the personal data of its current and prior employees. Further, public disclosure would reveal certain salary and job title benchmarks to prospective employees and may influence future salary negotiations.

The ability of others to obtain and use the foregoing information will tend to set a base amount below which salaries or other employment terms will not be negotiated.

5. The end result will be higher salaries or more favorable employment terms, or the loss of potential job talent because Alliant Energy cannot meet the required terms for all applicants. The end result would be either a direct or indirect financial or quality-of-work impact on IPL's customer.

Amortization Schedule for 2030 Notes

6. The amortization schedule for the notes due in 2030 relates to current outstanding litigation. While IPL is open to revealing this information for regulatory purposes in the state of Iowa, public disclosure of this information could impact ongoing civil litigation in another jurisdiction. Were IPL to be disadvantaged in litigation by the public disclosure of this information, IPL would be by extension disadvantaged in other business operations in which it was poised against any competitors. The end result will be higher bids, perhaps fewer bidders and eventually higher costs to the customer which furthers no public purpose. IPL has estimated direct and indirect costs that, if revealed, would disadvantage IPL competitively and adversely affect its customers.

7. The end result will be higher bids, perhaps fewer bidders and eventually higher costs to the customer which furthers no public purpose. IPL has

estimated direct and indirect costs that, if revealed, would disadvantage IPL competitively and adversely affect its customers.

Conclusion

8. The specific information IPL deemed confidential has been clearly marked as such by the OCA. The material subject to this request has been marked as "Confidential," in conspicuous and numerous locations upon the material.

9. IPL notes that the OCA has marked additional information confidential that, upon a more thorough examination, IPL has determined contains information sufficiently aged enough to alleviate any competitive concerns and therefore no longer requires confidential treatment. Therefore, any information not specifically addressed in Paragraphs 2 through 7 above need not be afforded confidential treatment.

10. The confidential treatment of the information described in paragraphs 2 through 7 above is required in order to preserve the confidential nature of that material to meet the exemption requirements of Iowa Code § 22.7 (3) and (6).

11. IPL is submitting an Affidavit in support of its Request for Confidentiality from the person responsible for overseeing electric operations for the Company.

WHEREFORE, Interstate Power and Light Company respectfully requests that the Iowa Utilities Board (Board) grant its Request for Confidentiality, and that the Board hold confidential the portions of IPL's filing so marked.

Dated this 27th day of July, 2009.

Respectfully submitted,

Interstate Power and Light Company

By /s/ Paula N. Johnson
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July 27, 2009

IOWA UTILITIES BOARD

STATE OF IOWA

BEFORE THE IOWA UTILITIES BOARD

IN RE:

**INTERSTATE POWER AND LIGHT
COMPANY**

DOCKET NO. RPU-2009-0002

AFFIDAVIT IN SUPPORT OF REQUEST FOR CONFIDENTIALITY

I, Thomas L. Aller, under oath depose and state that I am President of Interstate Power and Light Company (IPL), and as such, an Officer. In this capacity I am responsible for overseeing power plant operations.

Further, in the foregoing employment capacity, I am personally knowledgeable of the adverse impact to the public which would result from the disclosure of the confidential information contained in the Direct Testimony, and Exhibits submitted in this proceeding to the Board on July 17, 2009, by the Office of Consumer Advocate (OCA). This information includes specific costs related to the canceled Sutherland Generating Station Unit 4 (SGS Unit 4) project, personnel information including job titles and salaries of personnel involved in IPL's recent workforce reduction, and an amortization scheduled for notes due February 2030 and which are currently subject to outstanding litigation.

SGS Unit 4 Cancellation Costs

References are contained in both the OCA's testimony and exhibits that reference the status of the attribution of certain SGS Unit 4 cancellation costs between and among IPL and the other SGS Unit 4 participants. The attribution of

these SGS Unit 4 cancellation costs remains unresolved among the SGS Unit 4 participants. The discovery of the information discussed in the OCA's testimony and related exhibit could harm IPL's ability to manage these costs and eventually lead to higher costs to the customer which furthers no public purpose.

Personnel Information

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The ability of others to obtain and use the foregoing information will tend to set a base amount below which salaries or other employment terms will not be negotiated. The end result will be higher salaries or more favorable employment terms, or the loss of potential job talent because Alliant Energy cannot meet the required terms for all applicants. The end result would be either a direct or indirect financial or quality-of-work impact on IPL's customer.

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The foregoing information is provided in support of IPL Request for Confidentiality under the provisions of Iowa Code § 22.7 (3) and (6) (2009).

/s/ Thomas L. Aller
Thomas L. Aller
President

Subscribed and sworn before me,
a Notary Public in and for said County
and State, this 27th day of July, 2009.

/s/ Linda L. Kipp
Linda L. Kipp
Notary Public
My commission expires on September 6, 2011