

April 01, 2014

IOWA UTILITIES BOARD

STATE OF IOWA

BEFORE THE IOWA UTILITIES BOARD

<p><b>IN RE:</b></p> <p><b>INTERSTATE POWER AND LIGHT COMPANY</b></p>	<p><b>DOCKET NO. EPB-2014-0150</b></p>
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**APPLICATION FOR CONFIDENTIAL TREATMENT**

**COMES NOW**, Interstate Power and Light Company (IPL), and for its request for confidential treatment pursuant to Iowa Code § 22.7(3) and (6) (2013), states as follows:

1. IPL is submitting herein for filing with the Iowa Utilities Board (Board), pursuant to Iowa Code § 476.6(22), revisions to its Emission Plan and Budget (EPB).

2. IPL is separately filing a portion of its revisions that IPL deems to contain confidential materials in the form of a report to a government agency which, if released, would give advantage to competitors and serve no public purpose, pursuant to the requirements of Iowa Code § 22.7(3) and (6).

3. The material subject to this request has been marked as "Confidential," in conspicuous and numerous locations upon the material, and can be found specifically in the following locations:

4. Specifically, the materials that should be treated as confidential are contained in the following confidential sections of the filing:

- Section I:
  - Page 4;
- Section II:
  - Pages 5, 6, 14, 26, 28, 29, 30, 31, 32, 33, 41-42, 44, 45, 48, 51, 53, and 57;
- Direct Testimony of Terry L. Kouba:
  - Pages 5, 6, 14, 17, and 22.
- The Entirety of Appendix A; and
- The Entirety of Appendix C.

These documents specifically address the following areas:

- Emissions project descriptions and budgets both planned and potential;
- Emissions project studies;
- Generating unit outage information;
- Ongoing discussions that could require an amended EPB;
- Plant capacities, total IPL energy supplied percentages and book values;
- Implementation schedules at IPL's coal-fired generating plants;
- IPL's emissions allowance positions for NO<sub>x</sub> and SO<sub>2</sub>; and
- IPL's anticipated emissions reduction results.

The rationale for confidential treatment of these types of information can be distilled into the two following rationale:

- IPL's EPB contains information that could be used by IPL's competition to gather market-sensitive information relating to IPL's negotiating position and generation budget information relating to specific emissions control technologies and processes. Disclosure of such information could harm IPL's position in the competitive generation market to the detriment of its customers.
- IPL's EPB budget contains cost information relating to emissions control technologies and processes as well as specific information identifying specific IPL coal-fired generating plants affected by particular emission



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**AFFIDAVIT IN SUPPORT OF REQUEST FOR CONFIDENTIALITY**

I, Douglas R. Kopp, 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.

In the foregoing employment capacity, I am personally knowledgeable of the adverse impact to the public which would result from the disclosure of the following information related to IPL's Emissions Plan and Budget (EPB):

- Emissions project descriptions and budgets both planned and potential;
- Emissions project studies;
- Generating unit outage information;
- Ongoing discussions that could require an amended EPB;
- Plant capacities, total IPL energy supplied percentages and book values;
- Implementation schedules at IPL's coal-fired generating plants;
- IPL's emissions allowance positions for NO<sub>x</sub> and SO<sub>2</sub>; and
- IPL's anticipated emissions reduction results.

IPL's EPB contains information that could be used by IPL's competition to gather market-sensitive information relating to IPL's generation budget information

