

May 23, 2014

IOWA UTILITIES BOARD

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

IN RE: AVOIDED COSTS	DOCKET NO. INU-2014-0001
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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), states as follows:

1. On April 22, 2014, the Iowa Utilities Board (Board) issued its Order Initiating Investigation and Requiring Additional Information and Technical Workshop (April 22nd Order). The Board, among other things, required IPL to file “written information or manuals providing details of their respective models, supported by spreadsheets or other available information.” (April 22nd Order, p. 2.) IPL specifically employs the Electric Generation Expansion Analysis System (EGEAS) system in its avoided cost modeling. IPL submits this Application for Confidential Treatment contemporaneously with the submission of the Board-requested information in order to protect the proprietary EGEAS manuals and confidential data related to the actual EGEAS runs. IPL deems that these EGEAS-related manuals and data contain confidential materials 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).

2. The materials subject to this request have been marked “confidential,” in conspicuous and numerous locations upon the materials.

Specifically, this information can be found in the following locations:

- EGEAS Manuals:
 - EGEAS Capabilities Manual
 - EGEAS Users Guide
- EGEAS-Related Data:
 - 2014 avoided energy costs Table 1_CONF workpaper.xlsx
 - SEC 06 - Appendix 6B, Fuel and Capacity Costs (Trade Secret).xlsx from IPL’s Integrated Resource Plan¹
 - SEC 06 - Appendix 6C, IPLs Exis Gen Units, Purc and Sales (Trade Secret).xlsx from IPL’s Integrated Resource Plan

3. As for the manuals, IPL has obtained the proprietary EGEAS manuals via a licensing agreement. Pursuant to that agreement, IPL is not at liberty to publicly submit this information publicly. To do so would be in violation of that agreement, and may discourage EGEAS and other vendors with proprietary interests in their product from doing business with IPL in the future.

4. As for the data, IPL secures competitive bids for additional capacity and energy procurements. If the information contained in the referenced EGEAS data were disclosed to competitors, it would provide them with an undue advantage in negotiations. Further, certain information contained in the accompanying filing contains information that could affect ongoing negotiations

¹ IPL’s Integrated Resource Plan was filed with the Minnesota Public Utilities Commission on March 31, 2014, in Docket No. RP-14-77, and both Appendix 6B and 6C were filed with “trade secret” status, which is comparable to “confidential” status in Iowa.

with other parties. Public disclosure would discourage a supplier from furnishing a low bid which it may be willing to submit. The ability of others to obtain and use the foregoing information will tend to set a base amount below which bids will not be received or below which terms will not be negotiated.

5. Consequently, public disclosure could influence bidder's decisions to bid and the terms of their bids. The end result will be higher bids, perhaps fewer bidders and eventually higher costs to the customer which furthers no public purpose. Information on IPL's planning and forecasting processes, if revealed, would disadvantage IPL competitively and adversely affect its customers.

6. The confidential treatment of these materials is required in order to preserve its confidential nature to meet the exemption requirements of Iowa Code § 22.7(3) and (6).

7. IPL is submitting an Affidavit in support of its Request for Confidentiality from the person responsible for overseeing power purchase information for IPL.

WHEREFORE, for the reasons stated above, Interstate Power and Light Company respectfully requests the Iowa Utilities Board grant its Request for Confidentiality, and that the Board hold confidential the portions of the submitted EGEAS-related manuals and data, so marked.

Dated this 23rd day of May, 2014.

Respectfully submitted,

INTERSTATE POWER AND LIGHT
COMPANY

By: /s/ Paula N. Johnson
Paula N. Johnson
Senior Attorney - Regulatory
Alliant Energy Corporate Services, Inc.
200 First Street SE, P.O. Box 351
Cedar Rapids, IA 52406-0351
319.786.4742 – telephone
319.786.4533 – facsimile
paulajohnson@alliantenergy.com

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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 energy supply activities for IPL.

Further, in the foregoing employment capacity, I am personally knowledgeable of the adverse impact to the public which would result from the disclosure of information that is contained in the Electric Generation Expansion Analysis System (EGEAS)-based manuals and data prepared and submitted in accordance with the Iowa Utility Board's April 22, 2014, Order.

As for the manuals, IPL has obtained the proprietary EGEAS manuals via a licensing agreement. Pursuant to that agreement, IPL is not at liberty to publicly submit this information publicly. To do so would be in violation of that agreement, and may discourage EGEAS and other vendors with proprietary interests in their product from doing business with IPL in the future.

As for the data, IPL secures competitive bids for additional capacity and energy procurements. If the information contained in the referenced EGEAS data were disclosed to competitors, it would provide them with an undue

advantage in negotiations. Further, certain information contained in the accompanying filing contains information that could affect ongoing negotiations with other parties. Public disclosure would discourage a supplier from furnishing a low bid which it may be willing to submit. The ability of others to obtain and use the foregoing information will tend to set a base amount below which bids will not be received or below which terms will not be negotiated.

Consequently, public disclosure could influence bidder's decisions to bid and the terms of their bids. The end result will be higher bids, perhaps fewer bidders and eventually higher costs to the customer which furthers no public purpose. Information on IPL's planning and forecasting processes, if revealed, would disadvantage IPL competitively and adversely affect its customers.

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

/s/ Douglas R. Kopp

Douglas R. Kopp
President

Subscribed and sworn before me,
a Notary Public in and for said County
and State, this 23rd day of May, 2014.

/s/ Linda L. Kipp

Linda L. Kipp
Notary Public

My commission expires on September 6, 2014