

July 11, 2014

STATE OF IOWA
DEPARTMENT OF COMMERCE
BEFORE THE IOWA UTILITIES BOARD

IOWA UTILITIES BOARD

IN RE:

AVOIDED COSTS

DOCKET NO. INU-2014-0001

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). Several parties participated in the Technical Workshop, conducted on June 5, 2014. Several additional questions arose from the Technical Workshop, and the parties agreed they would provide responses to these questions in writing via EFS. In order to answer these questions, IPL must supply confidential and proprietary market data it has obtained from Wood Mackenzie that IPL uses for input in its resource planning. IPL submits this Application for Confidential Treatment contemporaneously with the submission of the Board-requested information in order to protect the confidential proprietary Wood Mackenzie market data. IPL deems that these 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 Confidential Attachments A1, A2, and A3 with IPL’s filed response.

3. IPL has obtained the proprietary Wood Mackenzie data 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 Wood Mackenzie and other vendors with proprietary interests in their product from doing business with IPL in the future.

4. Additionally, IPL secures competitive bids for additional capacity and energy procurements. If the information contained in the referenced Wood Mackenzie 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.

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 so closely related to 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, IPL respectfully requests the Iowa Utilities Board (Board) grant its Request for Confidentiality, and that the Board hold confidential the portions of the submitted Wood Mackenzie market data, so marked.

Dated this 11th day of July, 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

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

IN RE:

AVOIDED COSTS

DOCKET NO. INU-2014-0001

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 confidential and proprietary Wood Mackenzie market data that is contained in Confidential Attachments A1, A2, and A3, prepared and submitted in accordance with the agreement of the parties to submit answers to certain questions arising at the Iowa Utilities Board's (Board) Technical Workshop held on June 5, 2014, in the above-captioned docket.

IPL has obtained the confidential and proprietary Wood Mackenzie information 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 Wood Mackenzie and other vendors with proprietary interests in their product from doing business with IPL in the future.

Additionally, IPL secures competitive bids for additional capacity and energy procurements. If the information contained in the referenced Wood

Mackenzie 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 11th day of July, 2014.

/s/ Linda L. Kipp

Linda L. Kipp
Notary Public
My commission expires on September 6, 2014