

STATE OF IOWA
DEPARTMENT OF COMMERCE
BEFORE THE IOWA UTILITIES BOARD

IN RE: :
RATEMAKING PRINCIPLES : DOCKET NO. RPU-2014- 0002
APPLICATION :
:

AFFIDAVIT IN SUPPORT OF THE
REQUEST FOR CONFIDENTIAL TREATMENT

STATE OF IOWA)
) ss
COUNTY OF POLK)

I, Barry Campbell, of legal age, being first duly sworn on oath, do hereby depose and state that I am Vice President – Energy Supply Management, for MidAmerican Energy Company ("MidAmerican"), and in said position and based upon my professional experience I have personal knowledge of the facts stated herein.

My Affidavit is filed in support of the claim of privilege of MidAmerican for the following Confidential Information pertaining to MidAmerican's Wind IX Iowa Project, and provided as part of MidAmerican's Ratemaking Principle Application pertaining to the Wind IX project:

Information regarding how MidAmerican values the projected benefit of Wind IX's carbon-free generation of energy ("Confidential Information").

I state as follows:

It is my opinion that the Confidential Information comprises trade secrets, reported to a government agency (the Iowa Utilities Board), which is of significant commercial value to

MidAmerican. In addition, the Confidential Information constitutes a communication made to a government body that is not required by law, rule, procedure or contract, and is information that MidAmerican would be discouraged from providing were it available for public inspection. General availability of this Confidential Information to the general public and, specifically, to MidAmerican's potential wind project vendors, suppliers and MidAmerican's competitors for development of wind projects, would hurt MidAmerican's negotiating and competitive position in its efforts to add reasonably priced wind generation to its generation portfolio. Release of this information would serve no public purpose.

Again, MidAmerican would be discouraged from providing such information were it made available for public inspection.

My primary concern is to protect MidAmerican's confidential and commercially sensitive information from public disclosure in order that the Company may continue to operate competitively in its pursuit of wind generation projects. It is not my intent to withhold this information from the Iowa Utilities Board or the Office of Consumer Advocate who require it to carry out their statutory responsibilities.

Given the sensitivity of the Confidential Information described above, MidAmerican would request that review of the Confidential Information be limited to the Board, Board staff, and the Office of Consumer Advocate without protective order or agreement, and that the Confidential Information be withheld from general public inspection to the extent permitted by law, and by the rules of the Board.

Further, the Affiant sayeth not.

/s/ Barry Campbell
Barry Campbell

SUBSCRIBED AND SWORN TO before me this 2nd day of October, 2014.

/s/ Trudi L. Hytone
Notary Public in and for the State of Iowa