

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

IN RE: :
: **DOCKET NO. RPU-2014-0002**
APPLICATION OF MIDAMERICAN :
ENERGY COMPANY FOR A :
DETERMINATION OF :
RATEMAKING PRINCIPLES :

**AFFIDAVIT IN SUPPORT OF THE
REQUEST FOR CONFIDENTIAL TREATMENT**

STATE OF IOWA)
) ss
COUNTY OF POLK)

I, Adam L. Wright, of legal age, being first duly sworn on oath, do hereby depose and state that I am the Vice President – Wind Generation & Development, 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 documents/information ("Confidential Information"):

1. The unredacted version of pages 3 and 5 of Ratemaking Principles Application Section 2.1;
2. Tables 2.1-1(a-c) and Table 2.1-2 associated with Ratemaking Principles Application Section 2.1, which tables are only provided as confidential electronic documents (i.e., there are no redacted versions of these tables in the public part of the Ratemaking Principles Application.);
3. MidAmerican witness Peter Schuster's Exhibit __ (PJS-2), Schedule 2, the

transmission study for which confidential treatment is being sought—it is only provided as a confidential document, there is no redacted version in the public part of the filing. (Schedule 1 of that exhibit is a separate study that was previously made public by the Midcontinent Independent System Operator, Inc.);

4. The unredacted version of pages 47 through 50 of Neil Hammer’s testimony.

I state as follows:

It is my opinion that the Confidential Information comprises: (i) trade secrets; (ii) pricing, revenue and avoided cost information, and wind farm site information, reported to a government agency (the Iowa Utilities Board), which are of significant commercial value to MidAmerican and its customers; (iii) information that would give advantage to MidAmerican’s vendors, suppliers, and those who compete with MidAmerican for the purchase of wind generation components, for the sale of energy in wholesale markets, and for development of wind farms; and (iv) in one case, information (the above-mentioned transmission study) which, if released, could serve to threaten public safety and convenience—by providing insight and useful information to those who desire to do harm to the country’s critical energy infrastructure.

Moreover, the Confidential Information constitutes a report and a communication made to a government body that is not required by law, rule or procedure, and is information that MidAmerican would be discouraged from providing were it available for public inspection. The open access of this information to the general public and, specifically, to potential Wind IX Iowa Project (“Wind IX”) vendors and suppliers, to MidAmerican competitors in the wholesale energy markets, as well as MidAmerican’s competitors for the development of wind projects,

and adversaries in the effort to protect critical energy infrastructure, would hurt MidAmerican's negotiating leverage in its efforts to add reasonably priced wind generation to its generation facilities portfolio, to secure wind farm sites and the best possible prices in the wholesale energy markets, and to protect critical energy infrastructure. Release of this information would serve no public purpose.

I should add that the above-mentioned the transmission study is "critical energy infrastructure information," as that term is used by the Federal Energy Regulatory Commission.

My primary concern is to protect MidAmerican's confidential, trade secret, commercially sensitive, and security sensitive information from public disclosure in order that the Company may continue to operate competitively in its pursuit of the Wind IX project, as well as operate competitively in the wholesale energy markets and preserve the security of critical energy infrastructure. 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. The Confidential Information contains information that is similar to that which the Iowa Utilities Board has previously granted confidential status in MidAmerican's prior wind ratemaking principles proceedings¹ and a related update.²

¹ *MidAmerican Energy Company*, Docket No. RPU-2013-0003, *Order Granting Request for Confidentiality* (May 15, 2013); *MidAmerican Energy Company*, Docket No. RPU-2009-0003, *Order Granting Request for Confidentiality* (April 1, 2009), *MidAmerican Energy Company*, Docket No. RPU-08-4, *Order Granting Request for Confidentiality* (July 30, 2008), *MidAmerican Energy Company*, Docket No. RPU-08-2, *Order Granting Request for Confidentiality* (May 12, 2008), *MidAmerican Energy Company*, Docket No. RPU-07-2, *Order Granting Request for Confidentiality* (April 24, 2007 & June 25, 2007), *MidAmerican Energy Company*, Docket No. RPU-05-4, *Order Granting Request for Confidentiality* (March 29, 2006), *Order Granting Request for Confidentiality* (January 19, 2006), and *Order Granting Request for Confidentiality* (December 22, 2005); *MidAmerican Energy Company*, Docket No. RPU-04-3, *Order Granting Request for Confidentiality* (January 28, 2005); *MidAmerican Energy Company*, Docket No. RPU-03-1, *Order Granting Request for Confidentiality* (September 12, 2003).

² *MidAmerican Energy Company*, Docket No. RPU-2009-0003, *Order Granting Request for Confidentiality* (February 23, 2012)

Given the sensitivity of the Confidential Information described above, MidAmerican would request that prior to being given access to the information, any parties to the proceedings in this docket, other than the Office of Consumer Advocate, be required to enter into a confidentiality agreement with MidAmerican that limits access to such information and limits use of the information just to this proceeding.

Further, the Affiant sayeth not.

/s/ Adam L. Wright

SUBSCRIBED AND SWORN TO before me this 9th day of October, 2014.

/s/ Sherri R. Long
Notary Public in and for the State of Iowa