

December 19, 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. Pursuant to Iowa Code § 476.6(22), IPL is submitting herein for filing with the Iowa Utilities Board (Board), Additional Information in response to the Board's December 3, 2014 Order Requiring Additional Information regarding IPL's Emission Plan and Budget (EPB).

2. IPL is separately filing the Additional Information 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 revised material subject to this request has been marked as "Confidential," in conspicuous and numerous locations upon the material, and the revisions can be found specifically in the following locations:

- Page 12, Question 6, portions of Response (a) and (b);
- Page 15, Question 7, portion of response;

- Pages 17 and 18, Question 8, portion of response and footnote 1; and
- Attachment A.

The rationale for confidential treatment of this information can be distilled into the following rationales:

- 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 issues. Disclosure of such information could harm IPL's competitive position in procuring those technologies and processes, to the detriment of IPL's customers, furthering no public purpose.
- The information contained in this answer is a proprietary internal vetting process, and its disclosure could compromise the integrity of IPL's sourcing, solicitation, and negotiation processes.

4. Release of the information could result in the release of commercially sensitive, trade secret information, as well as higher costs to the remaining customers which furthers no public purpose, pursuant to the requirements of Iowa Code § 22.7(3) and (6).

5. The confidential treatment portion is required in order to preserve the confidential nature of that material to meet the exemption requirements of Iowa Code § 22.7(3) and (6).



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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

