

January 25, 2013

STATE OF IOWA

BEFORE THE IOWA UTILITIES BOARD IOWA UTILITIES BOARD

IN RE:

**INTERSTATE POWER AND LIGHT
COMPANY**

DOCKET NO. EEP-2012-0001

APPLICATION FOR CONFIDENTIAL TREATMENT

COMES NOW, Interstate Power and Light Company (IPL), and for its request for confidential treatment pursuant Iowa Code § 22.7(3) and (6) (2013), states as follows:

Introduction

1. IPL is submitting herein for filing with the Iowa Utilities Board, pursuant to Iowa Code § 476.6(14) and (16), as well as 199 IAC Chapter 35, its revised Energy Efficiency Plan for the time period 2014 through 2018 (Plan) consisting of six sections and 13 appendices.

2. IPL is separately filing a portion of its Plan 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 material subject to this request has been marked as "Confidential," in conspicuous and numerous locations upon the material.

Discussion

4. Specifically, the materials that should be treated as confidential are listed below. This confidential information is located in six of the Appendices submitted with the revised Plan in compliance with the requirements of the Board's December 26, 2012, Order Docketing Plan, Setting Intervention Deadline, Establishing Procedural Schedule, and Requiring Additional Information (December 26th Order). These Appendices are:

- i. Electric and natural gas load forecasts (Appendix C.1 and Appendix C.2, respectively);
- ii. Electric avoided cost calculations (Appendix E4);
- iii. Natural gas avoided cost calculations (Appendix F);
- iv. Cost Benefit Calculations (Appendix K);
- v. IPL Integrated Resource Plan (Appendix L); and
- vi. Analysis Supporting Revised Assessment (Appendix M).

5. This information should be considered confidential for the reasons cited below.

Forecasting and Planning

6. The information included in Appendices C.1, C.2, E4, F, K and L involve internal forecasting intended to determine future needs and long-term costs so that IPL can best examine the necessary resources to meet its customers' needs. Forecasting and planning aids IPL in determining the most economical use of energy, whether generated, conserved or purchased, for its customers. As needed, IPL secures competitive bids for additional capacity and purchases it

procures. If the information contained in the referenced documentation 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.

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

Proprietary Information

8. Appendices K and M includes the proprietary model utilized by its consultant, The Cadmus Group, Inc. (Cadmus), in conducting its cost benefit analyses for the Plan. Because the model is proprietary, and that proprietary information is subject to the control of its third-party consultant, IPL is unable to publicly release this information. If IPL released this information, it would damage its relationship with its consultant and, as a result, could have difficulty in retaining this consultant, or any other consultant who is aware of this breach, in the future. 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.

9. The end result will be higher costs for consultants willing to contract with IPL, and eventually higher costs to IPL's customers, which furthers no public purpose. Release of this information, would disadvantage IPL competitively and adversely affect its customers.

Conclusion

10. Release of the foregoing 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).

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

12. IPL is submitting an Affidavit in support of its Request for Confidentiality from a responsible corporate officer.

WHEREFORE, Interstate Power and Light Company respectfully requests that the Iowa Utilities Board (Board) grant its Request for Confidentiality, and that the Board hold confidential the portions of IPL's filing so marked.

Dated this 25th day of January, 2013.

Respectfully submitted,

Interstate Power and Light Company

By /s/ Paula N. Johnson

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IOWA UTILITIES BOARD

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IN RE:	
INTERSTATE POWER AND LIGHT COMPANY	DOCKET NO. EEP-2012-0001

AFFIDAVIT IN SUPPORT OF REQUEST FOR CONFIDENTIALITY

I, Thomas L. Aller, 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 certain information relating to IPL's revised Energy Efficiency Plan for the 2014 through 2018 time period (Plan). This confidential information is located in six of the Appendices submitted with the revised Plan in compliance with the requirements of the Board's December 26, 2012, Order Docketing Plan, Setting Intervention Deadline, Establishing Procedural Schedule, and Requiring Additional Information (December 26th Order). These Appendices are:

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The information included in Appendices C.1, C.2, E4, F, K and L involve internal forecasting intended to determine future needs and long-term costs so that IPL can best examine the necessary resources to meet its customers' needs. Forecasting and planning aids IPL in determining the most economical use of energy, whether generated, conserved or purchased, for its customers. As needed, IPL secures competitive bids for additional capacity and purchases it procures. If the information contained in the referenced documentation 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 bidders' decisions to bid and the terms of their bids. The end result will be higher bids, perhaps fewer bidders and eventually higher costs to IPL's customers, which furthers no public purpose. Information on IPL's planning and forecasting processes, if revealed, would disadvantage IPL competitively and adversely affect its customers.

Appendices K and M includes the proprietary model utilized by its consultant, The Cadmus Group, Inc. (Cadmus), in conducting its cost benefit

