



Alliant Energy Corporate Services
Legal Department
319-786-4505 – Phone
319-786-4533 – Fax

Paula N. Johnson
Senior Attorney - Regulatory

Interstate Power and Light Co.
An Alliant Energy Company

Alliant Tower
200 First Street SE
P.O. Box 351
Cedar Rapids, IA 52406-0351

Office: 1.800.822.4348
www.alliantenergy.com

June 21, 2013

Ms. Joan Conrad, Executive Secretary
Iowa Utilities Board
1375 East Court Avenue, Room 69
Des Moines, IA 50319-0069

**FILED WITH
Executive Secretary**

June 21, 2013

IOWA UTILITIES BOARD

RE: Interstate Power and Light Company
Docket No. EEP-2012-0001
Application and Affidavit for Confidentiality

Dear Secretary Conrad:

Enclosed please find Interstate Power and Light Company's (IPL) Application for Confidential Treatment and Affidavit in Support of Request for Confidentiality in the above-referenced docket, as filed today on EFS.

IPL submits this filing in order to request the continued confidential treatment of portions of the Environmental Law and Policy Center's, Iowa Environmental Council's and Iowa Policy Project's Surrebuttal Exhibit GCC-2 of Geoffrey Crandall as filed with the Iowa Utilities Board on June 11, 2013.

Very truly yours,

/s/ Paula N. Johnson
Paula N. Johnson
Senior Attorney - Regulatory

PNJ/kjf
Enclosure

June 21, 2013

IOWA UTILITIES BOARD

STATE OF IOWA

BEFORE THE 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. On June 11, 2013, the Environmental Law and Policy Center, Iowa Environmental Council and Iowa Policy Project (Environmental Intervenors) submitted pre-filed Surrebuttal Testimony in this proceeding. In particular, the Environmental Intervenors submitted the Surrebuttal Testimony of Geoffrey Crandall, together with Confidential Exhibit GCC-2.

2. The Environmental Intervenors separately filed Exhibit GCC-2 because it contained information IPL has deemed 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). The Environmental Intervenors submitted with Exhibit GCC-2 a Motion for Confidential Treatment together with an Affidavit in Support of confidential treatment of the information. IPL additionally submits this Application

for Confidential Treatment together with the supporting Affidavit of Thomas L. Aller, President of IPL.

3. The material subject to this request has been marked as "Confidential," in conspicuous and numerous locations upon the material.

4. Specifically, the materials in Exhibit GCC-2 that should be treated as confidential is comprised of a proprietary benefit-cost model developed by IPL's consultant, The Cadmus Group, Inc. (Cadmus). 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.

5. 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.

6. 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.

7. 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).

8. 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).

9. 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 Exhibit GCC-2 submitted by the Environmental Intervenors.

Dated this 21st day of June, 2013.

Respectfully submitted,

Interstate Power and Light Company

By /s/ Paula N. Johnson

Paula N. Johnson

Senior Attorney - Regulatory

200 First Street SE

P.O. Box 351

Cedar Rapids, IA 52406-0351

(319) 786-4742

PaulaJohnson@alliantenergy.com

June 21, 2013

IOWA UTILITIES BOARD

STATE OF IOWA

BEFORE THE IOWA UTILITIES BOARD

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) contained in Exhibit GCC-2 submitted with the Surrebuttal Testimony of Geoffrey Crandall by the Environmental Law and Policy Center, Iowa Environmental Council and Iowa Policy Project (Environmental Intervenors) in this proceeding.

The information included in Exhibit GCC-2 includes the proprietary model utilized by IPL's consultant, The Cadmus Group, Inc. (Cadmus), in conducting its cost benefit analyses. 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

