



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

August 9, 2013

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

**FILED WITH
Executive Secretary
August 09, 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 hearing exhibits of the Office of Consumer Advocates' Exhibit No. 106 and Environmental Intervenors' (comprised of the Environmental Law and Policy Center, Iowa Environmental Council and Iowa Policy Project) Exhibit Nos. 204, 205 and 220 as filed with the Iowa Utilities Board on July 31, 2013, and August 1, 2013, respectively.

Very truly yours,

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

PNJ/kjf
Enclosure

August 09, 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. The Environmental Intervenors¹ in this docket, as well as the Office of Consumer Advocate (OCA) have submitted several exhibits to the record in this docket.² Among these exhibits were certain data request responses provided by IPL to the Environmental Intervenors and to the OCA that IPL has determined contain confidential and/or trade secret information. IPL is therefore submitting this request for the confidential/trade secret treatment of these specific exhibits.

2. IPL notes that the Environmental Intervenors and the OCA have separately submitted both public and confidential versions of these exhibits, which IPL deems to contain confidential materials in the form of a report to a government

¹ The Environmental Law and Policy Center, Iowa Environmental Council, and Iowa Policy Project.

² The exhibits were submitted during the hearing in this matter conducted July 29-30, 2013, and were subsequently submitted via EFS on July 31, 2013, by the OCA and on August 1, 2013, by the Environmental Intervenors.

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 exhibits that should be treated as confidential are listed as follows:

- i. OCA Exhibit No. 106;
- ii. Environmental Intervenors Exhibit No. 204;
- iii. Environmental Intervenors Exhibit No. 205; and
- iv. Environmental Intervenors Exhibit No. 220.

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

OCA Exhibit No. 106

6. The data included in OCA Exhibit No. 106 contain information regarding IPL's 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, the information contained in OCA Exhibit No.

106 contains forecasting information provided specifically to not only the OCA, but also IPL customers participating in IPL's nonresidential interruptible program. IPL generally considers the information it provides to its customers during such conversations to be confidential. Public disclosure of this information could harm IPL's relationship with its customers by limiting conversations for fear the content of those conversations could become public.

7. Consequently, public disclosure of information related to IPL's planning and forecasting processes, if revealed, could disadvantage IPL competitively, which will ultimately adversely affect IPL's customers. Additionally, public disclosure could also damage the relationship between IPL and its customers because of the chance that confidential discussions could become public without those customers' specific knowledge or acquiescence.

Environmental Intervenors Exhibit Nos. 204 and 205

8. Exhibit Nos. 204 and 205 contain specific information regarding IPL's contract with its energy efficiency plan (EEP) consultant, The Cadmus Group, Inc. (Cadmus), and the specific duties performed by its consultant under the terms of that contract. If the information contained in the referenced documentation were disclosed to competitors, it would provide them with an undue advantage in negotiations. Any potential future competitor to Cadmus responding to a Request for Proposals would know a baseline price it could offer. Additionally, IPL often issues RFPs for similar services, and will be issuing an RFP under the specific terms of its Non-Unanimous Partial Settlement submitted to the Board in this docket for evaluation, monitoring and verification work. 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.

Environmental Intervenors Exhibit No. 220

10. Environmental Intervenors Exhibit No. 220 contains actual hourly annual solar production numbers related to one specific customer. While the customer is not named, IPL cautions that it may be possible for an individual to back into the customer's identity based upon the information provided.

11. Disclosure of customer-specific information could lead other IPL customers to question the privacy of their information in the hands of IPL, while furthering no public purpose, pursuant to the requirements of Iowa Code Section 22.7(3) and (6).

Conclusion

12. 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).

13. 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).

14. 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 9th day of August, 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

**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). This confidential information is located in four of the hearing exhibits submitted by the Office of Consumer Advocate (OCA) and the Environmental Intervenors during the July 29-30, 2013, hearing and subsequently submitted via EFS. These data requests are.

- i. OCA Exhibit No. 106;
- ii. Environmental Intervenors Exhibit No. 204;
- iii. Environmental Intervenors Exhibit No. 205; and
- iv. Environmental Intervenors Exhibit No. 220.

The information included in OCA Exhibit No. 106 and Environmental Intervenors Exhibit No. 220 involve internal forecasting (as well as solar PV

production information that compromises one piece of that 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, the information contained in OCA Exhibit No. 106 contains forecasting information provided specifically to not only the OCA, but also IPL customers participating in IPL's nonresidential interruptible program. IPL generally considers the information it provides to its customers during such conversations to be confidential. Public disclosure of this information could harm IPL's relationship with its customers by limiting conversations for fear the content of those conversations could become public.

Consequently, public disclosure of information related to IPL's planning and forecasting processes, if revealed, could disadvantage IPL competitively, which will ultimately adversely affect IPL's customers. Additionally, public disclosure could also damage the relationship between IPL and its customers because of the chance that confidential discussions could become public without those customers' specific knowledge or acquiescence.

Environmental Interventions Exhibit Nos. 204 and 205 contain specific information regarding IPL's contract with its energy efficiency plan (EEP) consultant, The Cadmus Group, Inc. (Cadmus), and the specific duties performed

by its consultant under the terms of that contract. If the information contained in the referenced documentation were disclosed to competitors, it would provide them with an undue advantage in negotiations. Any potential future competitor to Cadmus responding to a Request for Proposals would know a baseline price it could offer. Additionally, IPL often issues RFPs for similar services, and will be issuing an RFP under the specific terms of its Non-Unanimous Partial Settlement submitted to the Board in this docket for evaluation, monitoring and verification work. 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.

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.

Environmental Intervenors Exhibit No. 220 contains actual hourly annual solar production numbers related to one specific customer. While the customer is not named, IPL cautions that it may be possible for an individual to back into the customer's identity based upon the information provided.

Disclosure of customer-specific information could lead other IPL customers to question the privacy of their information in the hands of IPL, while furthering no public purpose, pursuant to the requirements of Iowa Code Section 22.7(3) and (6).

The foregoing information is provided in support of IPL's Request for Confidentiality under the provisions of Iowa Code §§ 22.7(3) and (6) 2013.

 /s/ Thomas L. Aller
Thomas L. Aller
President

Subscribed and sworn before me this 9th day of August, 2013.

 /s/ Linda L. Kipp
Linda Kipp
Notary Public
My commission expires on September 6, 2014.