

September 18, 2013

IOWA UTILITIES BOARD

STATE OF IOWA
BEFORE THE IOWA UTILITIES BOARD

IN RE:)
)
MIDAMERICAN ENERGY) DOCKET NO. EEP-2012-0002
COMPANY)
)
)

ENVIRONMENTAL INTERVENOR'S MOTION FOR CONFIDENTIAL TREATMENT

Environmental Law & Policy Center, Iowa Environmental Council, and Iowa Policy Project (“Environmental Intervenors”) request that the *Brief of Environmental Intervenors* be kept confidential by the Iowa Utilities Board (“IUB”), pursuant to Iowa Code § 22.7(3) and (6) and 199 Iowa Admin. Code §1.9(5) et seq. The Confidential *Brief* is being filed with the label “Confidential.” In accordance with the IUB’s rules, a public version of the *Brief* is also being filed. In support of this motion, the Environmental Intervenors state as follows:

1. The Environmental Intevenors have entered a protective agreement with Iowa Customers for Energy Efficiency (ICEE) to receive confidential information in this proceeding.
2. Environmental Intervenors understand that ICEE considers information in the undisclosed *Brief* to be confidential and deserving of protection of trade secret information as granted under Code of Iowa §22.7(3) (2011) and deserving of protection as a report to the Board which if released would give advantage to competitor and serve no public purpose.
3. The Environmental Intervenors’ request is based on ICEE’s designation and claims ICEE made in the Protective Agreement and Applications for Confidential Treatment filed by ICEE on September 11, 2013 and September 17, 2013.

Based on ICEE's designation of the information as confidential, Environmental Intervenors respectfully request the Board grant this Motion for Confidential Treatment of the *Brief of Environmental Intervnors*.

DATED: September 18, 2013

Respectfully submitted,

/s/ Joshua T. Mandelbaum

Joshua T. Mandelbaum
Staff Attorney
Environmental Law & Policy Center
505 5th Avenue, Suite 333
Des Moines, Iowa 50309
P: (515) 244-0253
Email: jmandelbaum@elpc.org