

**STATE OF IOWA
BEFORE THE IOWA UTILITIES BOARD**

IN RE: INTERSTATE POWER AND LIGHT COMPANY	DOCKET NO. EEP-2012-0001
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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) (2011), states as follows:

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 Energy Efficiency Plan for the time period 2014 through 2018 (Plan) consisting of six sections and 10 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.

4. Specifically, the materials that should be treated as confidential are listed below. These documents specifically address three following areas:

- i. Electric and natural gas load forecasts (Appendix C.1 and Appendix C.2, respectively);
 - ii. Electric avoided cost calculations (Appendix E4); and
 - iii. Natural gas avoided cost calculations (Appendix F).
5. This information should be considered confidential for the reasons cited below.

Forecasting and Planning

6. All three forms of information involve internal forecasting in order 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.

8. 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).

9. 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).

10. 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 30th day of November, 2012.

Respectfully submitted,

Interstate Power and Light Company

By /s/ Paula N. Johnson
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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 Energy Efficiency Plan for the 2014 through 2018 time period (Plan). This confidential information generally falls into the following categories, relating to three other Appendices submitted in compliance with the requirements of 199 IAC Chapter 35:

- i. Electric and natural gas load forecasts (Appendix C.1 and Appendix C.2, respectively);
- ii. Electric avoided cost calculations (Appendix E4); and
- iii. Natural gas avoided cost calculations (Appendix F).

All three forms of information involve internal forecasting in order 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

