

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

**FILED WITH
Executive Secretary
June 01, 2015
IOWA UTILITIES BOARD**

IN RE: :
: **DOCKET NO. RPU-2014-0002**
APPLICATION OF MIDAMERICAN :
ENERGY COMPANY FOR A :
DETERMINATION OF :
RATEMAKING PRINCIPLES :

**AFFIDAVIT IN SUPPORT OF THE
REQUEST FOR CONFIDENTIAL TREATMENT**

STATE OF IOWA)
) ss
COUNTY OF POLK)

I, Adam L. Wright, of legal age, being first duly sworn on oath, do hereby depose and state that I am the Vice President – Gas Delivery, and until recently served as the Vice President - Wind Generation & Development, for MidAmerican Energy Company ("MidAmerican"), and in said positions and based upon my professional experience, I have personal knowledge of the facts stated herein.

My Affidavit is filed in support of the claim of privilege of MidAmerican for the following information ("Confidential Information") filed in MidAmerican's Status Update for the Wind IX Iowa Project ("Wind IX"), required by the Iowa Utilities Board's ("Board") *Order Approving Settlement with Modifications* ("Order"), issued January 20, 2015:

1. The highlighted text in the unredacted first page of the said Status Update.

I state as follows:

It is my opinion that the Confidential Information comprises: (i) trade secrets; (ii) information pertaining to certain Wind IX costs reported to a government agency (the Iowa Utilities Board), which are of significant commercial value to MidAmerican and its customers; and (iii) information that would give advantage to MidAmerican's vendors, suppliers, and those who compete with MidAmerican for the purchase of wind project components, for the sale of energy in wholesale markets, and for development of wind farms. Moreover, the Confidential Information constitutes a report and a communication made to a government body that is not required by law, rule or procedure, and is information that MidAmerican would be discouraged from providing were it available for public inspection.

The Confidential Information could provide competitively advantageous insight, directly or indirectly, into MidAmerican's contract terms, ongoing vendor negotiations, project costs, and MidAmerican's processes and methodologies for developing wind projects, which would give competitors/vendors insight into MidAmerican's costs and processes/methodologies for developing wind projects.

The open access of this information to the general public and, specifically, to potential Wind IX and other wind project vendors and suppliers, to MidAmerican competitors in the wholesale energy markets, as well as MidAmerican's competitors for the purchase of wind generation components and the development of wind projects, would hurt MidAmerican's negotiating leverage in its efforts to add reasonably priced wind generation to its generation facilities portfolio, to secure wind farm sites and related property rights, and to secure the best possible prices in the wholesale energy markets. Release of this information would serve no public purpose.

My primary concern is to protect MidAmerican's confidential, trade secret, and commercially sensitive information from public disclosure in order that the Company may continue to operate competitively in its pursuit of the Wind IX project and other wind projects. It is not my intent to withhold this information from the Iowa Utilities Board or the Office of Consumer Advocate who require it to carry out their statutory responsibilities. The Confidential Information contains information that is similar to that which the Iowa Utilities Board has previously granted confidential status in MidAmerican's prior wind ratemaking principles proceedings,¹ a related wind project update,² and submissions of many of the same types of information in response to Board questions in the Wind IX ratemaking principles docket (Docket No. RPU-2014-0002).³

Given the sensitivity of the Confidential Information described above, MidAmerican would request that prior to being given access to the information, any parties to the proceedings in this docket, other than the Office of Consumer Advocate, be required to enter into a confidentiality agreement with MidAmerican that limits access to such information and limits use of the information just to this proceeding.

1 MidAmerican Energy Company, Docket No. 2014-0002, *Order Granting Request for Confidentiality* (October 22, 2014), *MidAmerican Energy Company*, Docket No. RPU-2013-0003, *Order Granting Request for Confidentiality* (May 15, 2013), *MidAmerican Energy Company*, Docket No. RPU-2009-0003, *Order Granting Request for Confidentiality* (April 1, 2009), *MidAmerican Energy Company*, Docket No. RPU-08-4, *Order Granting Request for Confidentiality* (July 30, 2008), *MidAmerican Energy Company*, Docket No. RPU-08-2, *Order Granting Request for Confidentiality* (May 12, 2008), *MidAmerican Energy Company*, Docket No. RPU-07-2, *Order Granting Request for Confidentiality* (April 24, 2007 & June 25, 2007), *MidAmerican Energy Company*, Docket No. RPU-05-4, *Order Granting Request for Confidentiality* (March 29, 2006), *Order Granting Request for Confidentiality* (January 19, 2006), and *Order Granting Request for Confidentiality* (December 22, 2005); *MidAmerican Energy Company*, Docket No. RPU-04-3, *Order Granting Request for Confidentiality* (January 28, 2005); *MidAmerican Energy Company*, Docket No. RPU-03-1, *Order Granting Request for Confidentiality* (September 12, 2003).

2 *MidAmerican Energy Company*, Docket No. RPU-2009-0003, *Order Granting Request for Confidentiality* (February 23, 2012)

3 *MidAmerican Energy Company*, Docket No. 2014-0002, *Order Granting Request for Confidentiality* (November 25, 2014), *MidAmerican Energy Company*, Docket No. RPU-2014-0002, *Order Granting Request for Confidentiality* (December 12, 2014), *MidAmerican Energy Company*, Docket No. RPU-2014-0002, *Order Granting Request for Confidentiality* (December 16, 2014).

Further, the Affiant sayeth not.

/s/ Adam L. Wright

SUBSCRIBED AND SWORN TO before me this 29th day of May, 2015.

/s/ Sherri R. Long
Notary Public in and for the State of Iowa