

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

ARTI, LLC,

Complainant,

v.

MIDAMERICAN ENERGY COMPANY,

Respondent.

DOCKET NO. FCU-2014-0016

REQUEST FOR CONFIDENTIAL TREATMENT

COMES NOW Arti, LLC (“*Arti*”) and, pursuant to Iowa Code § 22.7 and 199 IAC 1.9(6), requests that the Iowa Utilities Board (“*Board*”) issue an order granting confidential treatment to certain documents included in the post-hearing exhibit filing made by Arti this same day. In support of its request, Arti states:

1. Arti has this same day filed two cross exhibits on a post-hearing basis: Arti Cross Exhibit 1 and Arti Cross Exhibit 2.

2. Included in Arti’s post-hearing exhibit filing are the following confidential documents (the “*Confidential Documents*”):

- a. The confidential version of Arti Cross Exhibit 1.
- b. The confidential version of Arti Cross Exhibit 2.

3. The Confidential Documents include extremely sensitive information about Arti’s business and operations that Arti strictly maintains on an extremely secure, confidential, and proprietary basis. In addition, the discovery response attachment included in

the confidential version of Arti Cross Exhibit 1 was provided to Arti by MidAmerican on a confidential basis pursuant to a protective agreement between Arti and MidAmerican.

4. Accordingly, the Board should find and determine that the Confidential Documents contain confidential information in the form of trade secrets and commercially sensitive information that may and should be held confidential pursuant to Iowa Code § 22.7(3) and 199 IAC 1.9(5)“a”(1).

5. The Board should also find that the Confidential Documents constitute a report to a government agency that, if released, would give advantage to competitors and serve no public purpose, and accordingly may and should be held confidential pursuant to Iowa Code § 22.7(6) and 199 IAC 1.9(5)“a”(3).

6. In compliance with 199 IAC 1.9(6)“b”, the affidavit of Todd Christopher Carpenter, Manager of Arti, LLC, is attached in support of this request.

WHEREFORE, Arti respectfully requests that the Board issue an order granting confidential treatment to the Confidential Documents identified in ¶ 1 above.

Dated September 11, 2015.

Respectfully submitted,

/s/ Philip E. Stoffregen

PHILIP E. STOFFREGEN
OF
BROWN, WINICK, GRAVES, GROSS,
BASKERVILLE & SCHOENEBAUM, P.L.C.
666 Grand Avenue, Suite 2000
Des Moines, IA 50309-2510
Telephone: (515) 242-2433
Fax: (515) 323-8533
stoffregen@brownwinick.com

ATTORNEY FOR ARTI, LLC