

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

<p><b>ARTI, LLC,</b></p> <p><b>Complainant,</b></p> <p><b>v.</b></p> <p><b>MIDAMERICAN ENERGY COMPANY,</b></p> <p><b>Respondent.</b></p>	<p><b>DOCKET NO. FCU-2014-0016</b></p>
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**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 3 and Arti Cross Exhibit 4.
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 3.
  - b. The confidential version of Arti Cross Exhibit 4.
  - c. The confidential version of the attachment to Arti Cross Exhibit 4.
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 24, 2015.

Respectfully submitted,

*/s/ Philip E. Stoffregen*

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ATTORNEY FOR ARTI, LLC

**AFFIDAVIT**

STATE OF CALIFORNIA        )  
  )  
COUNTY OF SAN FRANCISCO    )

I, Todd Christopher Carpenter, having been duly sworn on oath, do hereby depose and state as follows:

1. I am the Manager of Arti, LLC.
2. I have read the foregoing request for confidential treatment to which this affidavit is attached, and the statements of fact therein are true and correct to the best of my knowledge, information, and belief.

*/s/ Todd Christopher Carpenter*

Todd Christopher Carpenter

SUBSCRIBED AND SWORN before me this 3rd day of September, 2015.

*/s/ S. Sapprasert O'Brien*

Notary Public in and for the State of California  
San Francisco County  
Commission # 2053120  
My commission expires 12/23/2017.