

STATE OF IOWA
DEPARTMENT OF COMMERCE
BEFORE THE IOWA UTILITIES BOARD

IN RE: :
: :
WIND POWER PROJECT STATUS : DOCKET NOS. RPU-2013-0003 and
UPDATE FOR THE : RPU-2014-0002
IOWA UTILITIES BOARD :
:

AFFIDAVIT IN SUPPORT OF THE
REQUEST FOR CONFIDENTIAL TREATMENT

STATE OF IOWA)
) ss
COUNTY OF POLK)

I, Michael C. Fehr, of legal age, being first duly sworn on oath, do hereby depose and state that I am Vice President - Regulation for MidAmerican Energy Company ("MidAmerican"), and in said position 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 Confidential Information pertaining to MidAmerican's Wind VIII and Wind IX projects, which is being provided as part of MidAmerican's Updates on those projects:

Certain cost information concerning the Wind VIII and Wind IX projects (i.e., the unredacted pages 1 and 2 of the Wind VIII update, and the unredacted page 1 of the Wind IX update, both of which updates are filed contemporaneous with this affidavit and the associated Application for Confidential Treatment).

I state as follows:

It is my opinion that the Confidential Information (the cost information) comprises trade secrets, reported to a government agency (the Iowa Utilities Board), which is of significant commercial value to MidAmerican. In addition, the Confidential Information constitutes a communication made to a government body that is not required by law, rule, procedure or contract, and is information that MidAmerican would be discouraged from providing were it available for public inspection. General availability of this Confidential Information (the cost information) to the general public and, specifically, to MidAmerican's potential wind project vendors, MidAmerican's competitors for the purchase of wind generation components and for the development of wind projects, and to MidAmerican's competitors in the wholesale energy markets, would hurt MidAmerican's negotiating and competitive position in future efforts to add reasonably priced wind generation to its generation portfolio and in future efforts to market energy. Release of this information would serve no public purpose.

Again, MidAmerican would be discouraged from providing such information (the cost information) were it made available for public inspection.

My primary concern is to protect MidAmerican's confidential and commercially sensitive information from public disclosure in order that the Company may continue to operate competitively in its pursuit of wind generation 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.

Given the sensitivity of the Confidential Information described above, MidAmerican would request that review of the Confidential Information be limited to the Board, Board staff, and the Office of Consumer Advocate without protective order or agreement, and intervenors, if any, who have entered into a confidentiality agreement with MidAmerican in the associated

docket, and that the Confidential Information be withheld from general public inspection to the extent permitted by law, and by the rules of the Board.

Further, the Affiant sayeth not.

/s/
Michael C. Fehr

SUBSCRIBED AND SWORN TO before me this 1st day of September, 2015.

/s/ Sheila L. Johnson
Notary Public in and for the State of Iowa

Commission Number 198344
My commission expires September 9, 2016