Filed with the Iowa Utilities Board on March 1, 2021, RPU-2018-0003

STATE OF IOWA DEPARTMENT OF COMMERCE BEFORE THE IOWA UTILITIES BOARD

IN RE:	:	
	:	
WIND POWER PROJECT STATUS UPDATE FOR THE IOWA UTILITIES BOARD	:	DOCKET NO. RPU-2018-0003

AFFIDAVIT IN SUPPORT OF THE REQUEST FOR CONFIDENTIAL TREATMENT

STATE OF IOWA)
) ss
COUNTY OF POLK)

I, Adam N. Jablonski, of legal age, being first duly sworn on oath, do hereby depose and state that I am Vice President – Resource Development for MidAmerican Energy Company ("MidAmerican" or "Company"), 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, IX, X, XI, XII and Repowering Projects which are being provided as part of MidAmerican's Updates on those Projects:

Certain cost and revenue information concerning the Wind VIII, IX, X, XI, XII and Repowering Projects (i.e., unredacted page 1 of the Wind VIII, IX, X, XI and XII Project Updates, and the 2nd and 3rd columns of Exhibit B attached to the Repowering Project Update, all of which 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 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 report to the Iowa Utilities Board ("Board") which, if released, would threaten the electric rate and cost interests of MidAmerican's customers and serve no public purpose. General availability of this Confidential 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, and would discourage disclosure of such information.

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 Board or the Office of Consumer Advocate ("OCA") 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 OCA, and that the Confidential Information be withheld from general public inspection to the extent permitted by law, and by the rules of the Board.

Filed with the Iowa Utilities Board on March 1, 2021, RPU-2018-0003

Further, the Affiant sayeth not.

/s/ Adam N. Jablonski
Adam N. Jablonski

SUBSCRIBED AND SWORN TO before me this 1st day of March, 2021.

/s/ Jamie Baker
Notary Public in and for the State of Iowa