

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

<b>IN RE:</b>  <b>INTERSTATE POWER AND LIGHT COMPANY</b>	<b>DOCKET NO. EEP-2018-0003</b>
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**APPLICATION FOR CONFIDENTIAL TREATMENT**

**COMES NOW**, Interstate Power and Light Company (IPL), and for its request for confidential treatment pursuant Iowa Code § 22.7(3) and (6), states as follows:

1. IPL is submitting herein for filing with the Iowa Utilities Board, pursuant to Iowa Code § 476.6(14) and (16), as well as 199 IAC Chapter 35, its Energy Efficiency Plan Annual Report for 2020 (Report) consisting of the Report and 6 appendices.

2. IPL is separately filing a portion of its Report that IPL deems to contain confidential materials in the form of a report to a government agency which, if released, would give advantage to competitors and serve no public purpose, pursuant to the requirements of Iowa Code § 22.7(3) and (6).

3. Specifically, IPL is seeking confidential treatment of the 2020 Appendix D Common Assumptions 1.1 and 2020 Appendix D Common Assumptions 1.3 portions of the Report. This information was previously granted confidential treatment by the Iowa Utilities Board. See August 10, 2018 Order Granting Request for Confidential Treatment Filed July 5, 2018 (Docket No. EEP-2018-0003) (granting request for confidential treatment of, *inter alia*, “benefit cost model precalculations located in Application Exhibit 3.2); June 2, 2020 Order Granting Request for

Confidential Information Filed May 12, 2020 (Docket No. EEP-2018-0003) (finding 2019 Appendix D Common Assumptions 1.1 and 2019 Appendix D Common Assumptions 1.3 “constitute[] a report to a governmental agency and that [their] disclosure would give competitors an unfair advantage and would serve no public purpose”).

4. The material subject to this request has been marked as "Confidential," in conspicuous and numerous locations upon the material.

5. This information should be considered confidential for the reasons cited below.

6. The 2020 Appendix D Common Assumptions 1.1 and 1.3 involve internal forecasting in order to determine future needs and long-term costs so that IPL can best examine the necessary resources to meet its customers' needs. Forecasting and planning aids IPL in determining the most economical use of energy, whether generated, conserved or purchased, for its customers. As needed, IPL secures competitive bids for additional capacity and purchases it procures. If the information contained in the referenced documentation were disclosed to competitors, it would provide them with an undue advantage in negotiations. Further, certain information contained in the accompanying filing contains information that could affect ongoing negotiations with other parties. Public disclosure would discourage a supplier from furnishing a low bid which it may be willing to submit. The ability of others to obtain and use the foregoing information will tend to set a base amount below which bids will not be received or below which terms will not be negotiated.

7. Consequently, public disclosure could influence bidders' decisions to bid and the terms of their bids. The end result will be higher bids, perhaps fewer bidders and eventually higher costs to IPL's customers, which furthers no public purpose. Information on IPL's planning and forecasting processes, if revealed, would disadvantage IPL competitively and adversely affect its customers.

8. Release of the foregoing information could result in the release of commercially sensitive, trade secret information, as well as higher costs to the remaining customers which furthers no public purpose, pursuant to the requirements of Iowa Code § 22.7(3) and (6).

9. The confidential treatment portion is required in order to preserve the confidential nature of that material to meet the exemption requirements Iowa Code § 22.7(3) and (6).

10. IPL is submitting an Affidavit in support of its Request for Confidentiality from a responsible corporate officer.

**WHEREFORE**, Interstate Power and Light Company respectfully requests that the Iowa Utilities Board (Board) grant its Request for Confidentiality, and that the Board hold confidential the portions of IPL's filing so marked.

Dated this 30th day of April, 2021.

Respectfully submitted,

Interstate Power and Light Company

By /s/ Lissa Koop

Lissa Koop

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**AFFIDAVIT IN SUPPORT OF APPLICATION FOR CONFIDENTIAL TREATMENT**

I, Terry L. Kouba, under oath depose and state that I am President of Interstate Power and Light Company (IPL), and as such, an Officer.

In the foregoing employment capacity, I am personally knowledgeable of the adverse impact to the public which would result from the disclosure of certain information relating to IPL's 2020 Energy Efficiency Plan Annual Report. This confidential information is contained in the 2020 Appendix D Common Assumption 1.1 and 1.3 workbooks.

The 2020 Appendix D Common Assumption 1.1 and 1.3 workbooks contain internal forecasting, which is necessary in order to determine future needs and long-term costs, allowing IPL to examine the necessary resources to meet its customers' needs. Forecasting and resource planning aids IPL in determining the most economical use of energy for its customers, whether generated, conserved, or purchased.

As needed, IPL secures competitive bids for additional capacity and purchases it procures. If the information contained in the referenced confidential information were disclosed to competitors, it would provide them with an undue advantage in negotiations. In addition, that information could affect ongoing

negotiations with other parties. Public disclosure of this information would discourage a supplier from furnishing a low bid which it otherwise may be willing to submit. Thus, the ability of others to obtain and use the foregoing confidential information will tend to set a base amount below which bids will not be received or below which terms will not be negotiated.

Consequently, public disclosure could influence bidders' decisions to bid and the terms of their bids. The end result will be higher bids, perhaps fewer bidders, and eventually higher costs to IPL's customers. Accordingly, information on IPL's planning and forecasting processes, if revealed, would disadvantage IPL competitively and adversely affect its customers.

The foregoing information is provided in support of IPL's Application for Confidential Treatment under the provisions of Iowa Code §§ 22.7(3) and (6).

/s/ Terry L. Kouba  
Terry L. Kouba  
President

Subscribed and sworn before me,  
a Notary Public in and for said County  
and State, this 30<sup>th</sup> day of April, 2021.

/s/ Renee A. Erschen  
Renee A. Erschen  
Notary Public  
My commission expires on October 2, 2023