



Alliant Energy Corporate Services, Inc.  
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Michael S. Greiveldinger  
Senior Attorney

Interstate Power and Light Company  
An Alliant Energy Company

Alliant Tower  
200 First Street SE  
P.O. Box 351  
Cedar Rapids, IA 52406-0351

Office: 1.800.822.4348  
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September 16, 2014

Dr. Burl Haar, Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101-2147

RE: Interstate Power and Light Company  
Docket No. E,G001/AI-14-350  
Supplement to Petition for Approval of Extension of and Modification to  
Affiliated Interest Agreements

Dear Dr. Haar:

Enclosed for e-Filing please find Interstate Power and Light Company's Supplement to Petition for Approval of Extension of and Modification to Affiliated Interest Agreements in the above-referenced docket.

Copies of this filing have been served on the Minnesota Department of Commerce, Division of Energy Resources, the Minnesota Office of Attorney General - Residential and Small Business Utilities Division, and the attached service list.

Respectfully submitted,

/s/ Michael S. Greiveldinger

Michael S. Greiveldinger  
Senior Attorney

MSG/kcb  
Enclosures

cc: Service List

STATE OF MINNESOTA

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger  
David C. Boyd  
Nancy Lange  
Dan Lipschultz  
Betsy Wergin

Chair  
Commissioner  
Commissioner  
Commissioner  
Commissioner

<p>IN THE MATTER OF INTERSTATE POWER AND LIGHT COMPANY'S PETITION FOR APPROVAL OF A MODIFICATION TO AGREEMENTS WITH AFFILIATES RELATED TO THE SALE OF ACCOUNTS RECEIVABLE</p>	<p>DOCKET NO. E,G001/AI-14-350</p>
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AFFIDAVIT OF SERVICE

STATE OF IOWA            )  
  ) ss.  
COUNTY OF LINN        )

Kathleen C. Balvanz, being first duly sworn on oath, deposes and states:

That on the 16<sup>th</sup> day of September, 2014, copies of the foregoing Affidavit of Service, together with Interstate Power and Light Company's Supplement to Petition for Approval of Extension of and Modification to Affiliated Interest Agreements, were served upon the parties on the attached service list, by e-filing, overnight delivery, electronic mail, facsimile and/or first-class mail, proper postage prepaid from Cedar Rapids, Iowa.

  /s/ Kathleen C. Balvanz    
Kathleen C. Balvanz

Subscribed and Sworn to Before Me  
this 16<sup>th</sup> day of September, 2014.

  /s/ Kathleen J. Faine    
Kathleen J. Faine  
Notary Public  
My Commission Expires on February 20, 2015

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Bobby	Adam	bobby.adam@conagrafoods.com	ConAgra	Suite 5022 11 ConAgra Drive Omaha, NE 68102	Electronic Service	No	OFF_SL_14-350_AI-14-350
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	OFF_SL_14-350_AI-14-350
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_14-350_AI-14-350
William A.	Blazar	bblazar@mnchamber.com	Minnesota Chamber Of Commerce	Suite 1500 400 Robert Street North St. Paul, MN 55101	Electronic Service	No	OFF_SL_14-350_AI-14-350
Michael	Bradley	mike.bradley@lawmoss.com	Moss & Barnett	150 S. 5th Street, #1200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-350_AI-14-350
City	Clerk	sschulte@ci.albertlea.mn.us	City of Albert Lea	221 E Clark St  Albert Lea, MN 56007	Electronic Service	No	OFF_SL_14-350_AI-14-350
Ian	Dobson	ian.dobson@ag.state.mn.us	Office of the Attorney General-RUD	Antitrust and Utilities Division 445 Minnesota Street, 1400 BRM Tower St. Paul, MN 55101	Electronic Service	No	OFF_SL_14-350_AI-14-350
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_14-350_AI-14-350
Michael	Greiveldinger	michaelgreiveldinger@alliantenergy.com	Interstate Power and Light Company	4902 N. Biltmore Lane  Madison, WI 53718	Electronic Service	No	OFF_SL_14-350_AI-14-350
David	Grover	dgrover@itctransco.com	ITC Midwest	901 Marquette Avenue Suite 1950 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-350_AI-14-350

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_14-350_AI-14-350
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_14-350_AI-14-350
Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street  St. Paul, MN 551012134	Electronic Service	No	OFF_SL_14-350_AI-14-350
Paula	Johnson	paulajohnson@alliantenergy.com	Alliant Energy-Interstate Power and Light Company	P.O. Box 351 200 First Street, SE Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_14-350_AI-14-350
Jim	Krueger	jkrueger@fmcs.coop	Freeborn-Mower Cooperative Services	Box 611  Albert Lea, MN 56007	Electronic Service	No	OFF_SL_14-350_AI-14-350
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_14-350_AI-14-350
Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd  Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_14-350_AI-14-350
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Electronic Service	No	OFF_SL_14-350_AI-14-350
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_14-350_AI-14-350
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_14-350_AI-14-350

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Steven	Nyhus	swnyhus@flaherty-hood.com	Flaherty & Hood PA	525 Park St Ste 470  Saint Paul, MN 55103	Electronic Service	No	OFF_SL_14-350_AI-14-350
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	OFF_SL_14-350_AI-14-350
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	12 S 6th St Ste 1137  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-350_AI-14-350
Matthew J.	Schuerger P.E.	mjsreg@earthlink.net	Energy Systems Consulting Services, LLC	PO Box 16129  St. Paul, MN 55116	Electronic Service	No	OFF_SL_14-350_AI-14-350
Ron	Spangler, Jr.	rlspangler@otpc.com	Otter Tail Power Company	215 So. Cascade St. PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_14-350_AI-14-350
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE  Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_14-350_AI-14-350

**STATE OF MINNESOTA**

**BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

**Beverly Jones Heydinger  
David C. Boyd  
Nancy Lange  
Dan Lipschultz  
Betsy Wergin**

**Chair  
Commissioner  
Commissioner  
Commissioner  
Commissioner**

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**IN THE MATTER OF INTERSTATE  
POWER AND LIGHT COMPANY'S  
PETITION FOR APPROVAL OF A  
MODIFICATION TO AGREEMENTS  
WITH AFFILIATES RELATED TO THE  
SALE OF ACCOUNTS RECEIVABLE**

**DOCKET NO. E,G001/AI-14-350**

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**Statement Providing Justification for Trade Secret Information**

Interstate Power and Light Company (IPL) is providing a non-public version of an amendment to a contract regarding its Receivable Sales Program in the above captioned docket.

The non-public version of the filing contains trade secret information, as defined by section 13.37 subd. 1(b), of the Minnesota Statutes, in that the amendment to the contract is subject to efforts by IPL and other parties that are reasonable under the circumstances to maintain its non-disclosure, and derives independent economic value, actual or potential from not being generally known to, and being readily ascertainable by proper means by, other person who can obtain economic value from its disclosure or use. While certain related agreements have been previously publicly available, this amendment has not. Additionally, the amendment and related contracts are subject to certain confidentiality provisions and should be handled accordingly. IPL has marked the information pursuant to the Commission's Revised Procedures for handling Trade Secret and Privileged Data. Minn. Rule, pt. 7829.0500.

IPL respectfully requests that the amendment to the contract be treated as trade secret information. Public release of this information would harm IPL by providing competitors with additional knowledge of the Receivable Sales Program. Those competitors could use this knowledge to improve their negotiating positions in future transactions, to the detriment of IPL or its affiliates. Because disclosure of the information would compromise the ability to negotiate

future contracts on terms and conditions most favorable to it, the harm of public disclosure outweighs the benefits of such disclosure.

Accordingly, IPL believes the marked information contained in IPL's filing meets the definition of trade secret under Minn. Stat. § 13.37.

**STATE OF MINNESOTA**

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**IN THE MATTER OF INTERSTATE POWER  
AND LIGHT COMPANY'S PETITION FOR  
APPROVAL OF A MODIFICATION TO  
AGREEMENTS WITH AFFILIATES RELATED  
TO THE SALE OF ACCOUNTS RECEIVABLE**

**DOCKET NO. E,G001/AI-14-350**

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**SUPPLEMENT TO PETITION FOR APPROVAL OF EXTENSION OF AND  
MODIFICATION TO AFFILIATED INTEREST AGREEMENTS**

On April 29, 2014, Interstate Power and Light Company (“IPL”) submitted, pursuant to Minn. Stat. § 216B.48, Minn. R. 7825.2200, and *Order Initiating Repeal of Rule, Granting Generic Variance, and Clarifying Internal Operating Procedures* in Docket No. E,G-999/CI-98-651 (Sept. 14, 1998), Minnesota Public Utilities Commission (“Commission”) a petition for approval of an extension and modification to IPL’s Receivable Sales Program. IPL’s Receivable Sales Program includes contracts among IPL, Alliant Energy Corporation (“AEC”), Alliant Energy Corporate Services, Inc. (“AECS”), IPL SPE LLC (“IPL SPE”), and Alliant Energy SPE LLC (“Alliant SPE”) (collectively the “Alliant Energy Companies”). Subsequent to the filing the parties to one of the contracts determined that there was a need for further amendment. This Supplement to the Petition provides updated information in light of that amendment.



On August 22, 2014, the parties to the Amended and Restated Receivables Purchase and Sale Agreement among Alliant SPE, Victory Receivables Corporation (“Victory”), The Bank of Tokyo-Mitsubishi UFJ, Ltd., New York Branch (“BTMU”), and AECS executed Amendment No. 4 to that agreement. Amendment No. 4 is attached as Exhibit 11. That amendment changes the Loss-to-Liquidation ratio limit within the contract.

With the information presented in this Supplement to the Petition, the remainder of the information contained in IPL’s original Petition remains accurate. IPL respectfully requests that the Commission consider the amendment and the information in this Supplement as it reviews the petition for approval of an extension and modification to IPL’s Receivable Sales Program.

Attached is a verification of this Supplement, which is marked as Exhibit 12.

**WHEREFORE**, IPL respectfully restates its request that the Commission approve the amendments and modifications to the agreement with affiliates related to the Receivable Sales Program.

Dated this 16<sup>th</sup> day of September, 2014.

Respectfully submitted,

**INTERSTATE POWER AND LIGHT COMPANY**

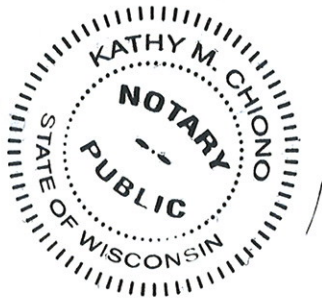
By: /s/ Michael S. Greiveldinger  
Michael S. Greiveldinger  
Senior Attorney  
Alliant Energy Corporate Services, Inc.  
4902 North Biltmore Lane  
Madison, Wisconsin 53718  
Ph. (608) 458-3318  
michaelgreiveldinger@alliantenergy.com

**VERIFICATION** )  
 )  
**STATE OF WISCONSIN** ) **ss.**  
 )  
**COUNTY OF DANE** )

Neil M. Krebsbach, being first duly sworn on his oath, deposes and says that he is the Assistant Treasurer and Director of Finance at Alliant Energy Corporate Services, Inc., which provides services to Interstate Power and Light Company; that he has read the foregoing Supplemental Petition; that he knows the contents thereof; and that the facts therein stated are accurate and complete to the best of his knowledge, information and belief.

*Neil M. Krebsbach*  
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Neil M. Krebsbach  
Assistant Treasurer and  
Director of Finance  
Alliant Energy Corporate Services, Inc.



Subscribed and sworn to before me  
this 15<sup>th</sup> day of September, 2014

*Kathy M. Chiono*  
\_\_\_\_\_

Notary Public, State of Wisconsin  
My Commission expires: February 5, 2017

PUBLIC DOCUMENT  
TRADE SECRET DATA HAS BEEN EXCISED

[TRADE SECRET DATA BEGINS

Exhibit 11  
5 Pages

TRADE SECRET DATA ENDS]