

Alliant Energy Corporate Services Legal Department 319-786-7765 – Phone 319-786-4533 – Fax

Kent M. Ragsdale Managing Attorney - Regulatory

August 30, 2013

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. E001/PA-13-\_\_\_\_

Petition for Approval of Transfer of Land Easements, Wind Rights, and Rights to Purchase Wind Turbines, to its Affiliate Franklin County Wind, LLC

Dear Dr. Haar:

Enclosed for e-Filing in the above referenced docket, please find Interstate Power and Light Company's (IPL) Petition for Approval of Transfer of Land Easements, Wind Rights, and Rights to Purchase Wind Turbines, to its Affiliate Franklin County Wind, LLC 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,

By: /s/ Kent M. Ragsdale

Kent M. Ragsdale Managing Attorney – Regulatory

KMR/tao Enclosures Interstate Power and Light Co. An Alliant Energy Company

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

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#### STATE OF MINNESOTA

## BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

**Beverly Jones Heydinger** Chair David C. Boyd Commissioner **Nancy Lange** Commissioner J. Dennis O'Brien Commissioner **Betsy Wergin** Commissioner

IN THE MATTER OF INTERSTATE POWER AND LIGHT COMPANY FOR APPROVAL OF TRANSFER OF LAND EASEMENTS, WIND RIGHTS, AND DOCKET NO. E001/PA-13-RIGHTS TO PURCHASE WIND TURBINES, TO ITS AFFILIATE FRANKLIN COUNTY WIND. LLC

## **AFFIDAVIT OF SERVICE**

STATE OF IOWA	)
	) ss
COUNTY OF LINN	)

Tonya A. O'Rourke, being first duly sworn on oath, deposes and states:

That on the 30<sup>th</sup> day of August, 2013, copies of the foregoing Affidavit of Service, together with Interstate Power and Light Company's Petition for Approval of Transfer of Land Easements, Wind Rights, and Rights to Purchase Wind Turbines, to its Affiliate Franklin County Wind LLC, 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, lowa.

> /s/ Tonya A. O'Rourke Tonya A. O'Rourke

Subscribed and Sworn to Before Me this 30<sup>th</sup> day of August, 2013.

/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@conagrafood s.com	ConAgra	Suite 5022 11 ConAgra Drive Omaha, NE 68102	Paper Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
Julia	Anderson	Julia.Anderson@ag.state.m n.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
City	Attorney	N/A	City of Albert Lea	221 E Clark St Albert Lea, MN 56007	Paper Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
William A.	Blazar	bblazar@mnchamber.com	Minnesota Chamber Of Commerce	Suite 1500 400 Robert Street Nor St. Paul, MN 55101	Electronic Service th	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
Michael	Bradley	bradleym@moss- barnett.com	Moss & Barnett	4800 Wells Fargo Ctr 90 S 7th St Minneapolis, MN 55402-4129	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
lan	Dobson	ian.dobson@ag.state.mn.u s	Office of the Attorney General-RUD	Antitrust and Utilities Division 445 Minnesota Street, BRM Tower St. Paul, MN 55101	Electronic Service 1400	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
Sharon	Ferguson	sharon.ferguson@state.mn .us	Department of Commerce	85 7th Place E Ste 500  Saint Paul, MN 551012198	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
David	Grover	dgrover@itctransco.com	ITC Midwest	444 Cedar St Ste 1020  Saint Paul, MN 55101-2129	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
Linda	Jensen	linda.s.jensen@ag.state.m n.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
Jim	Krueger	jkrueger@fmcs.coop	Freeborn-Mower Cooperative Services	Box 611  Albert Lea, MN 56007	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
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	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd  Oconomowoc, WI 53066	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Paper Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
Jenny L.	Myers	jmyers@iwla.org	Izaak Walton League of America	1619 Dayton Ave. Suite 202 St. Paul, MN 55104	Paper Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560  Minneapolis, MN 55401	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
Steven	Nyhus	swnyhus@flaherty- hood.com	Flaherty & Hood PA	525 Park St Ste 470 Saint Paul, MN 55103	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kent	Ragsdale	kentragsdale@alliantenerg y.com	Alliant Energy-Interstate Power and Light Company	P.O. Box 351 200 First Street, SE Cedar Rapids, IA 524060351	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	12 S 6th St Ste 1137  Minneapolis, MN 55402	Paper Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
Matthew J.	Schuerger P.E.	mjsreg@earthlink.net	Energy Systems Consulting Services, LLC	PO Box 16129  St. Paul, MN 55116	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
Ron	Spangler, Jr.	rlspangler@otpco.com	Otter Tail Power Company	215 So. Cascade St. PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
Robyn	Woeste	robynwoeste@alliantenerg y.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List

#### STATE OF MINNESOTA

## BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger Chair
David C. Boyd Commissioner
Nancy Lange Commissioner
J. Dennis O'Brien Commissioner
Betsy Wergin Commissioner

In the Matter of Interstate Power and Light Company for Approval of Transfer of Land Easements, Wind Rights, and Rights to Purchase Wind Turbines, to its Affiliate, Franklin County Wind, LLC

**DOCKET NO. E001/PA-13-**

# **Statement Providing Justification for Trade Secret Information**

Interstate Power and Light Company (IPL) is providing a non-public version of its Wind Development Assets Purchase and Sale Agreement with Franklin County Wind, LLC (FCW), a related Board of Directors' presentation and a January 2011 market survey report, prepared by Garrad Hassan, 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 data is the subject of efforts by IPL 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. IPL has marked the information pursuant to the Commission's Revised Procedures for handling Trade Secret and Privileged Data. Minn. Rule, pt. 7829.0500.

Specifically, IPL respectfully requests that certain terms and conditions of the agreement between IPL and FCW and the related Board of Directors' presentation be treated as trade secret information. Public release of this information would harm FCW by providing competitors with knowledge of FCW's costs. Those competitors could use this knowledge to improve their negotiating positions in future transactions, to the detriment of FCW. Because disclosure of the information would compromise FCW's ability to negotiate future contracts on terms and conditions most favorable to it, the harm of public disclosure outweighs the benefits of such disclosure.

Additionally, respectfully requests that that a January 2011 market survey report, prepared by Garrad Hassan at IPL's direction, be treated as trade secret information. Public release of this information would harm IPL by providing third parties with knowledge of IPL's estimates of market costs. Those third parties could use this knowledge to improve their negotiating positions in future transactions, to the detriment

of IPL and its customers. Because disclosure of the information would compromise IPL's ability to negotiate future contracts on terms and conditions most favorable to it, the harm of public disclosure outweighs the benefits of such disclosure.

Finally, in compliance with federal agencies' identity theft "Red Flag Rules", IPL has redacted certain routing and account information relating to its accounts with financial institutions.

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

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**Beverly Jones Heydinger** Chair David C. Boyd Commissioner Nancy Lange Commissioner J. Dennis O'Brien Commissioner **Betsy Wergin** Commissioner

In the Matter of Interstate Power and Light Company for Approval of Transfer of Land Easements, Wind DOCKET NO. E001/PA-13-Rights, and Rights to Purchase Wind Turbines, to its Affiliate, Franklin **County Wind, LLC** 

## **SUMMARY FILING**

Please take notice that on August 30, 2013, Interstate Power and Light Company (IPL) filed with the Minnesota Public Utilities Commission (Commission) its petition for approval of IPL's sale and transfer of land easements, wind rights, and rights to purchase wind turbines to its affiliate -- Franklin County Wind LLC (FCW).