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Interstate Power and Light Company
An Alliant Energy Company

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August 30, 2013

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

RE: Interstate Power and Light Company
Docket No. E,G001/AI-13-_____
Petition for Approval of Affiliated Interest Agreement

Dear Dr. Haar:

Enclosed for e-Filing please find Interstate Power and Light Company's (IPL) Petition for Approval of Affiliated Interest Agreement 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/ Kent M. Ragsdale
Kent M. Ragsdale
Managing Attorney - Regulatory

KMR/tao
Enclosures

cc: Service List

STATE OF MINNESOTA

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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

Chair
Commissioner
Commissioner
Commissioner
Commissioner

<p>IN THE MATTER OF INTERSTATE POWER AND LIGHT COMPANY'S TRANSFER OF LAND EASEMENTS, WIND RIGHTS, AND RIGHTS TO PURCHASE WIND TURBINES, TO ITS AFFILIATE, FRANKLIN COUNTY WIND, LLC</p>	<p>DOCKET NO. E,G001/AI-13-____</p>
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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 30th day of August, 2013, copies of the foregoing Affidavit of Service, together with Interstate Power and Light Company's Petition for Approval of Affiliated Interest Agreement, 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/ Tonya A. O'Rourke
Tonya A. O'Rourke

Subscribed and Sworn to Before Me
this 30th 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@conagrafoods.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.mn.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 North St. Paul, MN 55101	Electronic Service	No	GEN_SL_Interstate Power and Light Company_Interstate Power and Light Company General Service List
Michael	Bradley	bradley@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
Ian	Dobson	ian.dobson@ag.state.mn.us	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@mutilityinvestors.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.mn.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	kmains@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@alliantenergy.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@otpc.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@alliantenergy.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
David C. Boyd
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In the Matter of Interstate Power and Light Company's Transfer of Land Easements, Wind Rights and Rights to Purchase Wind Turbines, to its Affiliate, Franklin County Wind, LLC	DOCKET NO. E,G001/AI-13-_____
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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) 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 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.

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

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

**Beverly Jones Heydinger
David C. Boyd
Nancy Lange
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**In the Matter of Interstate Power and
Light Company's Transfer of Land
Easements, Wind Rights, and Rights
to Purchase Wind Turbines, to its
Affiliate, Franklin County Wind, LLC**

DOCKET NO. E,G001/AI-13-_____

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 an affiliated interest agreement between IPL and Franklin County Wind, LLC (FCW), a wholly owned subsidiary of Alliant Energy Corporation (AEC) regarding IPL's sale and transfer of land easements, wind rights, and rights to purchase wind turbines to its affiliate -- FCW.

STATE OF MINNESOTA

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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

**Chair
Commissioner
Commissioner
Commissioner
Commissioner**

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

DOCKET NO. E,G-001/AI-13-_____

**PETITION FOR APPROVAL OF AN AFFILIATED INTEREST AGREEMENT
BETWEEN INTERSTATE POWER AND LIGHT COMPANY AND FRANKLIN
COUNTY WIND, LLC**

In compliance with Minnesota Public Utilities Commission's (Commission) July 1, 2013, Order in Docket Nos. E,G001/AI-12-32, E,G001/AI-12-187, E,G001/AI-12-192 and E,G001/AI-12-792, Interstate Power and Light Company (IPL) hereby petitions the Commission, 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), for approval of an affiliated interest agreement between IPL and Franklin County Wind, LLC (FCW), a wholly owned subsidiary of Alliant Energy Corporation (AEC).

I. SUMMARY OF FILING

Pursuant to Minn. R. 7829.1300, subp. 1, a one-paragraph summary of the filing is attached.

II. SERVICE

Pursuant to Minn. R. 7829.1300, subp. 2, Petition on the Minnesota Department of Commerce, Division of Energy Resources (Department) and the Office of the Attorney General – Antitrust and Utilities Division (OAG). A copy of the Summary of Filing has been served upon IPL's general service list for miscellaneous electric filings.

III. GENERAL FILING INFORMATION

Pursuant to Minn. R. 7829.1300, subp. 4, IPL provides the following required information:

A. Name, Address, And Telephone Number Of Utility:

Interstate Power and Light Company
200 First Street SE
PO Box 351
Cedar Rapids, Iowa 52406-0351
800.822.4348

B. Name, Address, And Telephone Number Of The Attorney for The Utility:

Kent M. Ragsdale
200 First Street SE
PO Box 351
Cedar Rapids, Iowa 52406-0351
319.786.7765

C. The Date of The Filing and Date Proposed Agreement will Take Effect

This Petition is being filed on August 30, 2013. IPL requests approval of the Wind Development Assets Purchase and Sale Agreement (Sale Agreement) effective as of its execution date of June 29, 2011.

D. Statute Controlling Schedule For Processing The Filing

This Petition is being submitted pursuant to Minn. Stat. § 216B.48, and Minn. R. Part 7825.2200. These provisions do not establish an explicit time deadline for

Commission action. Under Minn. R. 7829.1400, initial comments are due within 30 days of filing, with replies due 10 days thereafter.

E. Signature and Title of the Utility Employee(s) Responsible For The Filing

Robyn Woeste
Regulatory Relations Manager
200 First Street SE
PO Box 351
Cedar Rapids, Iowa 52406-0351
319.786.4384

IV. DESCRIPTION AND PURPOSE OF FILING

A. Introduction

This Petition is being filed in compliance with the Commission's direction in its July 1, 2013, Order in Docket Nos. E,G001/AI-12-32, E,G001/AI-12-187, E,G001/AI-12-192 and E,G001/AI-12-792, and seeks the Commission's approval of an affiliated interest agreement, under 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).

The particular affiliated interest agreement, subject to this petition is the Wind Development Assets Purchase and Sale Agreement (Sale Agreement), dated June, 29, 2011, between IPL and FCW.¹ Pursuant to the Sale Agreement, on June, 29, 2011, IPL sold, and FCW purchased from IPL certain land easements, wind rights, and rights to purchase wind turbines.

B. Filing Requirements Pursuant to Docket No. E,G-999/CI-98-651

1. A heading that identifies the type of transaction.

Wind Development Assets Purchase and Sale Agreement.

¹ The June 29, 2011, Sale Agreement is included with this Petition as Trade Secret Exhibit A.

2. *The identity of the affiliated parties in the first sentence.*

Interstate Power and Light Company, Franklin County Wind, LLC.

3. *A general description of the nature and terms of the agreement, including the effective date of the contract or arrangement and the length of the contract or arrangement.*

As previously disclosed by IPL (first in its initial January 6, 2012, Petition in Docket No. E,G-001/AI-12-32 and most recently in its initial October 24, 2012, Petition in Docket No. E,G-001/AI-12-1157), IPL transferred the land rights associated with WWC to FCW on June 29, 2011, at cost, which was determined to be equivalent to the current market price. Also on June 29, 2011, IPL transferred to FCW its right to purchase 60 Vestas wind turbine generators under the 2008 agreement between IPL, Vestas, IPL's sister utility Wisconsin Power and Light Company (WPL), and their service company, Alliant Energy Corporate Services, Inc. (AECS).

4. *A list and the past history of all current contracts or agreements between the utility and the affiliate, the consideration received by the affiliate for such contracts or agreements, and a summary of the relevant cost records to these ongoing transactions.*

i. Common Facilities Capacity Agreement (CFCA)

Currently under review by the Commission in Docket No. E,G001/AI-12-32; executed on December 7, 2011.

ii. IPL-FCW Land Lease Agreement

Currently under review by the Commission in Docket No. E,G001/AI-12-187; executed on February 1, 2012.

iii. Telecommunications Sharing Agreement

Included as part of the past history section of the IPL – FCW Land Lease Agreement filing (Docket No. E,G001/AI-12-187).

iv. Local Balancing Authority Agreement

Currently under review by the Commission in Docket No. E,G001/AI-12-192; executed on February 7, 2012.

v. Affiliate Services Agreement

Currently under review by the Commission in Docket No. E,G001/AI-12-1157; executed on September 24, 2012.

5. *A descriptive summary of the pertinent facts and reasons why such contract or agreement is in the public interest.*

In 2008, Vestas Americas (Vestas), IPL, WPL and AECS entered into a Master Supply Agreement (Vestas MSA) for the purchase of 303 Vestas 1.65 mega Watt (MW) Turbines. Of those turbines, IPL erected 121 turbines in Franklin County, Iowa (known as Whispering Willow Wind Farm East (WWE)) and WPL erected 122 turbines in Freeborn County, Minnesota (known as Bent Tree) leaving approximately 60 turbines (Turbines) to be deployed. Originally, the Turbines were to be used by either IPL or WPL, but as environmental, political, economic, and regulatory climates changed, IPL and WPL re-evaluated the need to build additional wind projects, and concluded that construction and ownership of additional wind projects was not in the public interest at this time.

Recent events in Minnesota supported IPL's conclusions regarding the change in regulatory climates for any additional IPL-owned wind projects. In IPL's 2010 electric rate case (Docket No. E-001/GR-10-276), the Department expressed concerns regarding IPL's construction cost for WWE and placed particular emphasis on the costs associated with the Vestas turbines:

The OES² contends that the Commission should deny IPL full cost recovery for the WWE because the costs of constructing the facility were unreasonably

² At the time that Docket No. E-001/GR-10-276 was litigated, the Department was known as the Minnesota Department of Commerce/Office of Energy Security (the "OES").

high. The OES infers that the primary reason why the WWE's costs were unreasonably high was IPL's decision to accelerate construction of WWE to assure that facility would be in service by the end of 2009. Because of that decision, the OES argues, IPL did not procure its WTGs through a competitive bidding process, and that, in turn, resulted in unreasonably high WTG costs. (Administrative Law Judge's Findings of Fact, Conclusions and Recommendation issued on April 27, 2011, ¶ 210, p. 54).

During the time that the ultimate disposition of the Turbines was under review, the Vestas MSA required that progress payments be made to Vestas for the right of an Alliant Energy Corporation (AEC) entity to purchase the Turbines. IPL made these progress payments to Vestas. Prior to concluding that the Turbines should be constructed by FCW, other opportunities were investigated, including: 1) selling the Turbines, 2) partnering with a third party; 3) and allowing Vestas to sell the Turbines to another party.

By spring of 2011, none of these prospects appeared likely to move forward, and it was decided to transfer the right to purchase the turbines to FCW, a new, non-regulated affiliate of IPL and WPL. It was then decided that FCW would construct its wind project at WWC, which required FCW to obtain the land easements and wind rights associated with WWC. These land easements and wind rights were held as non-utility property by IPL (in FERC account 121 – Nonutility Property) and transferred to FCW. At that point, neither IPL, FCW, nor any other AEC entity had possession or control of the Turbines. They were either in construction, or being held overseas, until an owner and a wind project was specified.

Subsequent to the decision to transfer the Turbines, IPL consulted and followed the company wide affiliate interest transaction procedure: REG 100 (REG 100 was submitted to the Commission, as Exhibit A, with IPL's May 24, 2012, Reply Comments

in Docket Nos. E,G-001/AI-12-32, E,G-001/AI-12-187 and E,G-001/AI-12-192). Under this procedure the transaction was analyzed and it was concluded that the Turbine, Land and Wind rights were not utility property. This conclusion was reached because the Turbine, Land and Wind rights had never been used and useful in rendering service to the public and ratepayers had not borne any of the costs related to the creation of these rights. Consequently, the transfer of the Turbine, Land, and Wind rights did not have any regulatory impact on ratepayers. Therefore, IPL determined that it did not require Commission approval to make the transfer effective for regulatory purposes.

After that review, IPL understood that with regard to construction and operation of the new wind project by FCW at the site formerly known as WWC, any transactions between IPL and FCW regarding construction and operation of FCW must be scrutinized for affiliated interest ramifications per the internal affiliate interest transaction procedure: REG 100. IPL also understood that any contracts or arrangements between affiliates must:

- 1) meet FERC's market price standards where goods and services provided by a utility to an affiliate must be at the higher of cost or market;
- 2) hold IPL ratepayers harmless; and
- 3) be reviewed by a regulatory attorney to determine cost and filing requirements.³

In the months following transfer of the Turbine, Land, and Wind rights, IPL consulted the internal affiliate interest transaction procedure (REG 100) and reviewed the three agreements filed in Docket Nos. E,G-001/AI-12-32, E,G-001/AI-12-187 and

³ IPL provided a similar description, regarding the Wind Development Assets Purchase and Sale Agreement, in its May 14, 2012, Reply Comments in Docket Nos. E,G-001/AI-12-32, E,G-001/AI-12-187 and E,G-001/AI-12-192.

E,G-001/AI-12-192, as well as a Telecom Sharing Agreement that did not reach the \$50,000 annual affiliate interest threshold established by Minn. Stat. § 216B.48.⁴

6. *The amount of compensation and, if applicable, a brief description of the cost allocation methodology or market information used to determine cost or price.*

The affiliated interest, FCW did not receive any consideration for these agreements or arrangements. The transfer of these non-utility assets were transferred to FCW, and FCW remitted to IPL the higher of cost or market. As outlined in IPL's response to the Department's Information Request Nos. 1 and 2, the market cost of the Turbines was determined by analyzing confidential discussions with potential third party purchasers, market research, and industry reports, which led to the conclusion that the cost of the turbines surpassed the market value at the time of transfer.⁵ The market cost of the land and wind rights were also analyzed using a series of quantitative and qualitative factors, and it was determined that the market value of the land and wind rights were equivalent to IPL's cost.⁶

7. *If the service or good acquired from an affiliate is competitively available, an explanation must be included stating whether competitive bidding was used and, if it was used, a copy of the proposal or a summary must be included. If it is not competitively bid, an explanation must be included stating why bidding was not used.*

In this transaction IPL is supplying the goods and services to an affiliate.

8. *If the arrangement is in writing, a copy of that document must be attached.*

⁴ Since the Commission's August 8, 2012, Order in in Docket Nos. E,G-001/AI-12-32, E,G-001/AI-12-187, E,G-001/AI-12-192 and E,G-001/AI-12-792, IPL has filed for Commission approval for a new Affiliate Services Agreement between IPL and FCW in Docket No. E,G-001/AI-12-1157.

⁵ Responses to the Department's Information Requests 1 and 2 were included in the Departments April 6, 2012, comments in Docket Nos. E,G-001/AI-12-32 E,G-001/AI-12-187 and E,G-001/AI-12-192 as Attachment 1 and 2.

⁶ IPL provided a similar description, regarding the Wind Development Assets Purchase and Sale Agreement, in its May 14, 2012, Reply Comments in Docket Nos. E,G-001/AI-12-32, E,G-001/AI-12-187 and E,G-001/AI-12-192.

See Trade Secret Exhibit A for a copy of the Wind Development Assets Purchase and Sale Agreement between IPL and FCW.⁷

9. *Whether, as a result of the affiliate transaction, the affiliate would have access to customer information, such as customer name, address, usage or demographic information.*

The affiliate transaction did not allow FCW to have access to IPL's customer information.

10. *The filing must be verified.*

See Exhibit B.

WHEREFORE, IPL respectfully requests that the Commission approve the Wind Development Assets Purchase and Sale Agreement with an effective date of June 29, 2011.

Dated this 30th day of August, 2013.

Respectfully submitted,

Interstate Power and Light Company

/s/ Kent M. Ragsdale

Kent M. Ragsdale
Managing Attorney - Regulatory
Alliant Energy Corporate Services, Inc.
200 First Street SE
PO Box 351
Cedar Rapids, Iowa 52406-0351
kentragdale@alliantenergy.com
319.786.7765

⁷ On August 27, 2012, a copy of this agreement was provided by IPL to the Commission and other parties in Docket No. E,G-001/AI-12-792.